



Annual Report of the Short-Term Holding Facilities in Scotland and Northern Ireland

**For reporting year
1 February 2022 – 31 January 2023**

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Introductory sections 1–3

Statutory role of the IMB

The Scotland and Northern Ireland Independent Monitoring Board is appointed by the Home Secretary to monitor and report on the welfare of people detained in a short-term holding facility (STHF) through observation of their treatment and of the premises in which they are held.

The Board undertakes its work in line with the Short-Term Holding Facility (STHF) Rules, which place the day to day operations of STHFs on a statutory footing. Part 7 of the Rules sets out the responsibilities of the Independent Monitoring Board (referred to in the Rules as the Visiting Committee). The Board has unrestricted access to every person who is detained, to all immigration detention facilities and to most records. IMB members have access, at all times, to all parts of the facilities and can speak to detained individuals outside of the hearing of officers. They must consider any complaint or request which a detained person wishes to make to them and make enquiries into the case of any detained person whose mental or physical health is likely to be injuriously affected by any conditions of detention. The IMB must inform the STHF manager about any matter which they consider requires their attention, and report to the Secretary of State about any matter about which they consider the Home Office needs to be aware.

The Board's duties also include the production of an annual report covering the treatment of detained individuals, the state and administration of the facilities, as well as providing any advice or suggestions it considers appropriate. This report has been produced to fulfil that obligation.

The Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that states designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detainees and to make recommendations for the prevention of ill-treatment. The IMB's are part of the United Kingdom's National Preventive Mechanism.

Description of the holding rooms and residential STHF (RSTHF)

2.1 Drumkeen House Reporting Centre and Holding Room

The Drumkeen House complex, in Belfast, is occupied by Home Office Immigration Enforcement and the Care and Custody (C&C) service delivery manager. People resident in Northern Ireland who have been temporarily admitted to the UK, including asylum seekers awaiting decisions about their status, are required to report periodically at this centre. People who are detained while reporting or detained during immigration enforcement operations are held in the holding room (HR).

IMB members from the Scotland and Northern Ireland STHF IMB have unrestricted entry authorised by the Home Office (HO) to the complex. The holding facility consists of an office area and two small HRs to accommodate detained men and women separately. There is an observation window between the office area and both HRs to ensure the safe detention of the persons detained. The holding facility is normally staffed by two Detention Custody Officers (DCOs) when the holding room is in use. Drumkeen House is a non-residential facility with detained people held for a short period and then usually transferred to Larne House if detention is necessary.

Hot and cold drinks can be provided for detained people, and light snacks and hot meals are also available.

The HR's seating comprises individual plastic seats and a table which are all fixed to the floor. There are toilets in each HR. There is no access to fresh air or natural light.

Magazines in various languages are available and a prayer mat can be provided on request.

As with the other non-residential HR's, there is no access to fresh air or natural light. An authorised smoking area is also not available at this location.

The Board's monitoring experience at Drumkeen House was re-initiated during the year as Covid restrictions were eased. The Board did not observe any issues that raised significant concern regarding the treatment and conditions of those detained at Drumkeen House during the reporting period.

It is a matter of concern that persons being detained have to pass through the DCOs' work area to enter the holding rooms, as the work area desks have computers etc. on the desk which could present opportunities for disruption. The number of detained people held in the HR during the full year period covered by this report is shown in the statistics (Annex).

2.2 Larne House STHF

This facility opened in July 2011 and is located within the Larne police station compound. It is a residential facility, the only one in Northern Ireland (NI), where people detained for immigration purposes may be held. People may be detained for up to seven days where Removal Directions (RDs) have been served. Where these have not been served, the maximum period of detention at the residential short-term holding facility (RSTHF) is five days.

The Scotland and Northern Ireland STHF IMB has been undertaking monitoring at Larne House since the end of 2012.

The RSTHF continues to be managed by Care and Custody. The normal staffing model is

four C&C staff managers and 22 DCOs who operate on a four-shift rotating model. Due to the length of detention at Larne House compared with the other facilities monitored by the Board, there is greater opportunity for interaction between the DCOs and people detained at Larne House.

There is no Home Office Immigration Enforcement (HOIE) or Border Force (BF) presence at Larne House. If there is a detained person who cannot be managed after being accepted at Larne House there are contingency arrangements in place to ensure individuals can be moved to a more suitable location. In the first instance, this would be to an IRC in England. Police stations can sometimes be used.

Families with young children are not detained at Larne House. They are given temporary admission (bail) to Northern Ireland with direction to report to Drumkeen House Reporting Centre as and when required.

Larne House can accommodate up to 19 detained people in 10 bedrooms, only some of which are for single use. Whilst bedrooms are separate, the current layout of the facility makes association between men and women unavoidable in the areas listed in the description of the complex below.

Therefore we remain concerned that planned alterations to the layout of the facility, to provide a separate designated area for women in detention who do not wish to associate with detained men, have not been implemented and continue to be long overdue, we consider the delay remains unacceptable. It is also still the case that the bedrooms are very basic, containing only a bed and wardrobe. There are no wall decorations, or reading lamps. Wooden edge beds are raised above the height of each mattress making it quite uncomfortable to sit on. The lack of suitable seating in bedrooms has been an issue raised by the Board in a number of previous reports. One bedroom was upgraded during the year, and we would wish to see all bedrooms brought up to this standard.

The Centre is compact, clean, and fairly well decorated. It is regularly cleaned by contractors. Although there is no natural light, the eco-lighting system is effective and efficient. There are no light switches and when areas are not in use the lighting reduces to a low intensity level.

The small recreation room offers a TV with Freesat providing in excess of 100 channels, a selection of DVDs, books, newspapers and magazines, all in various languages. English language newspapers are normally provided daily, and those in other languages tend to be changed infrequently. We understand that there will be ongoing improvements to the seating in this area.

Other areas at the complex include:

- Reception, offices and staff room
- Interview rooms
- A 'management' room/office
- A custody office for use by a C&C manager, containing a small 'shop' selling basic items such as soap, cigarettes, etc. to those detained
- Showers and toilets
- A multi-faith prayer room, with religious materials available for a variety of faiths
- A dining room/kitchen area with tables and fixed seating
- A hot and cold drinks machine
- All-day supply of cereals, milk and fruit with the provision of hot meals prepared by DCOs from frozen/chilled packs using microwave and other ovens
- Washing and drying equipment
- A medical room

There is also a small outside area where detained people may smoke and have access to fresh air and to undertake light exercise.

When a detained person is admitted to Larne House, he or she is assessed for detention suitability. The resident duty nurse undertakes a review of any medications brought in with the individual and makes a general assessment of their health situation. A fully qualified nurse is on duty 24-hours a day, seven days a week throughout the year.

Detained people have freedom of movement and association across all areas except for the custody office. Those who have been admitted without adequate clothing are given a pack containing basic underwear and tracksuit type outer-garment.

Detained people may use their own mobile phones providing no camera is fitted and internet access is not available. If required, they can be issued with a basic mobile phone to be returned when they leave.

The issues that have concerned the Board most this past year relate to the unsuitability of the bedroom furnishings and the delay in commencing the works to separate male and female residents.

A disability audit was undertaken by the Board during the latter part of the previous reporting year and the outcomes are shown in section 5.

2.3 Aberdeen airport holding rooms

UK Border Force (UKBF) are responsible for the holding rooms, and all detained people.

We are advised that most of the detained people may be seafarers or oil or gas workers flying into work. Sometimes seafarers could be bailed to their ships, if the ships were sailing directly to a non-UK port, and so a removal would have been affected.

Should a detained person be required to be further detained, C&C will collect the person and take them to Dungavel Immigration Removal Centre (IRC).

At the time of writing the airport is open from 7.00 am to 11.30 pm daily.

When a flight arrives, if a person needs to be questioned, they will be asked to sit on seats beside the arrivals area. At this point an IS81 (Authority to Detain form) is opened. If translation is required, UKBF officers use Google translate on their official phones for simple questions. There is a small room nearby where baggage can be searched.

If a person requires to be detained, and an IS91 (Authority for detention by Care & Custody form) opened, the Holding Room (HR) area is just a minute or two away from the arrivals area. This new facility opened in 2018 and is part of the UKBF offices. UKBF were involved in the design of the area.

The HR area comprises a staff office with windows to observe both the HRs. There is also a small office where PPE supplies, bedding, disposable towels, and wash packs are stored. Snacks are stored in a cupboard in the staff area. If a detained person requires more than a snack, the company Dalcross Handling would arrange for a hot meal and bill the airline who had flown in the detained person.

In the staff area there is also a small space which can be screened off for searching detained people. In a search, phones/belts/sharp objects/cigarettes and lighters would be removed. If a detained person wishes to make a call, they can do so under supervision in the staff area, or the corridor.

There are two rooms for detained people. One is set up as a family room with magazines

and toys for children. There is a small table and chairs, a sofa and a TV. There is a shower room, and a toilet with guard rails, an emergency pull, and a baby changing flap. However, neither shower is suitable for wheelchair users. There is a water fountain and a complaints box, with complaint forms and a pencil. The second room also has a toilet and a shower room. There is a small table, three chairs and a sofa, a TV, water fountain, and complaints box. There is also another small room which can be used as a prayer room. A prayer mat is held in the staff area, and staff are able to advise on the direction of Mecca. Qurans and Bibles are provided in the rooms. Both rooms are kept very clean and tidy, and because of their relative newness they look very fresh.

The rooms are cleaned after each detained person leaves, and an additional weekly check is made.

When there are people detained, normally a UKBF member of staff remains in the staff area, but if resource/operational requirements do not allow that, the detained people can be monitored on CCTV from the UKBF office.

There is also an interview room with a Perspex screen between the desks. and a spider phone. This phone can be used for Big Word translation, if translation is needed, and the translation service can also be called.

A disability audit was undertaken during the latter part of the previous reporting year and the outcomes are shown in section 5.

2.4 Glasgow Prestwick Airport Custody Holding Facilities

Immigration and detention matters, including custody of persons in detention, are handled exclusively by the UKBF team at Prestwick Airport (PIK). Officers do not transfer custody to C&C DCOs, as is the practice at Edinburgh and Glasgow Airports. Also, while there is a custody Holding Room (HR) at the airport, it has not been used over this reporting period, and individuals are instead detained within the Controlled Waiting Area (CWA), in full view of other disembarking passengers.

Our monthly monitoring schedule consists of one in person visit, and one phone call enquiry. We enjoy the full cooperation of the UKBF staff for both types of visits.

The airport is open 24 hours a day and Prestwick's UKBF are on duty 24 hours per day, seven days per week. Prestwick's UKBF Officer resources are very limited and arranged essentially to cover flight arrivals. There is normally a minimum of three UKBF Officers on duty each shift, including night shifts. Back support is available from the GLA and EDI based Officer Teams; however response time for additional officers from Glasgow Airport to attend PIK is approximately one hour and much longer for Edinburgh based Officers. There was an occasion, during this reporting period, when substantial numbers of additional officers were required to assist with the detention and processing of a large number of persons detained from a flight arriving at Prestwick.

Although the traffic at Prestwick Airport (PIK) is normally moderate, there are occasions when flights to other airports are diverted to PIK for disembarkation, often at short notice.

The HR at PIK, with an adjacent observation room, is two floors up from the immigration area. Those with mobility issues would have considerable difficulties negotiating the stairs. There isn't a lift, although a disability escalator currently services the floor below the HR. The final section of this escalator requires to be reinstalled. The HR currently does not have CCTV so individuals are instead detained at the immigration CWA. Persons detained there are monitored remotely on the CCTV system, from the UKBF office which is two floors away.

When a flight arrives, if a passenger needs to be questioned, they will be asked to sit on seats beside the arrivals area. At this point an IS81 would be opened. If translation was required, UKBF Officers use Google translate on their official phones for simple questions. There is a small room nearby where baggage can be searched.

If a person requires to be detained, an IS91 is opened and the individual is then transferred, by C&C transport, to either Glasgow Airport's HR or Dungavel IRC.

Food is provided, where required or requested, either from the upstairs HR storage cupboard, or from the food retail premises within the terminal. There is always a good stock of foodstuffs including those required for different religious denominations, in the HR storage cupboard.

Persons in detention are permitted to make a phone call, under supervision, in the UKBF staff area.

There are no showering facilities but public toilets, including one adapted for use for those with disabilities, are available, adjacent to the CWA.

2.5 Glasgow airport holding rooms

Glasgow airport is the second largest airport, by volume of passenger numbers, in Scotland. The holding rooms consist of a waiting area, interview rooms and a fingerprint room as well as two HR areas, a search area, storage space, a toilet and a DCO office. The office is very small and can only accommodate two DCOs at a time.

The DO office is situated between the two HRs and officers can therefore observe detained people through the one-way glass panels. There is also continuously monitored CCTV covering both holding rooms. There are two interview rooms used by UKBF, not monitored by CCTV during this reporting period. They have also been used as HRs as required. The facility has been reconfigured so that the second, separate HR has been created. The second HR added is to separate vulnerable passengers and families if required. The HRs are staffed by two DCOs who operate between 8am and 1am each day.

There are no showering facilities available for detained people and this continues to be a significant issue, particularly when people are held overnight. Also, in common with other airport HRs, an initial cursory health check is recorded when the IS91 is prepared.

Refreshments and light foods are available for detained people. A landline telephone can be used by them and they may also use their own mobile phones, provided no camera is linked to the device. DCOs can issue a 'house' mobile where the detained person uses his or her own SIM card. There are a number of newspapers and magazines available, which DCOs pick up each day from the free selection in the airport. A number of notices and relevant information is available in different languages including information on how a detained person may lodge a complaint on a paper form. A variety of reading material, including religious books, in different languages, is available. Basic information and advice on immigration/asylum matters are provided in leaflet and poster form, again in a variety of languages. There is no natural light in the holding area and no access to fresh air. The ventilation system urgently requires to be upgraded, particularly with the continued presence of the Covid-19 virus.

A new heating system has been installed during this reporting period which can also be used as an air conditioner in the summer. Smoking is not permitted within the airport,

which causes problems at times for some detained people, particularly those smokers who have arrived on a long, intercontinental flight. Nicotine replacement lozenges are available, but often do not meet the needs of the smokers.

Vasco translators have been removed from this facility and Samsung tablet translators are now in use. Big word continues to be used for inductions, and the Samsung translator for general communication.

There are lounge type portable bed pads, with pillows and blankets available when required. There is an upholstered seating bench which can also be used for sleeping on. Seating consists of fixed plastic chairs and the above-mentioned narrow bench.

A large bean bag, which has proved quite popular with some detained people, is also available. DCOs indicated that these items are cleaned daily after there have been people detained in the HR. With regard to Covid-19 precautions, DCOs have informed us that they have adequate PPE, and sufficient masks and hand sanitiser to meet the needs of the staff and detained people. A mask is offered to everyone entering this facility and offered at 4 hourly periods thereafter. There are handheld, non-contact thermometers in the staff area, but staff are not permitted to use them.

As a result of our recommendations, a disabled accessible toilet has now been installed within this reporting period. The toilet door gives sufficient room for wheelchair access. There are sufficient grab bars at the toilet to allow transfer from a wheelchair. Grab bars are also fitted at the hand wash basin with the soap dispenser and dryer within reach. The toilet has sufficient space to provide a full turning circle and there is ease of exit. A working alarm system has been fitted. The baby changing unit is unusable by a wheelchair bound person, being too high. There is, as yet, no clear colostomy shelf, and there remains no shower within this facility.

Available space is very limited and there are currently restrictions on the number of people who can be accommodated safely within the overall HR. DCOs are often required to escort detained people to a departure flight. As a result of our recommendations, a monitor of live arrivals and departures is now in the staff area of the HRs. The number of people held in the holding facility in the period covered by this report is shown in the statistics (see Annex). This was reduced from last year due to the reduction of flights due to the Covid-19 pandemic.

2.6 Festival Court reporting centre (RC)

The HR is located in a complex of buildings occupied by the HO/UKBF at Festival Court, Glasgow. Persons who have been temporarily admitted to the UK and are resident in Scotland are required to report periodically at this centre. Some are asylum seekers awaiting decisions about their status. The HR is used for people detained on reporting, during an operational enforcement visit or who are required for interview from an IRC. It is also used, when family removal operations are being carried out, as an assembly point before detained people are transported to an embarkation port. The average length of detention is just over three hours.

The holding facility consists of an office area and the HR. There is also the use of an additional interview room when separate detention accommodation is required. There is an observation window between the control room and the HR; however, there is no such provision for the use of the interview room, so a DCO is deployed to ensure the safe

detention of the person while they are in the interview room. The holding facility is currently staffed by two DCOs, from 9am until 5pm Monday to Friday and full CCTV operates within the HR.

Cold water, hot drinks, snacks and light meals can be provided for detained people. A notebook with photos of available food has been provided to allow people to request meals if they are not able to read the description. Meals are inventoried and checked regularly for 'use-by' dates.

The HR contains individual fixed plastic seats and a table. The room has two toilets which are cubicles in each corner of the back of the room, one male and one female. There are no toilet seats, as they were deemed to be a security hazard. A portable lounge type folding bed with bedding is available, making it possible for one person to lie down in the unlikely event of them being accommodated for a long period. However, detained people are usually promptly moved to other suitable accommodation within a short time.

The toilets have not been equipped for use by those with disabilities, including people using a wheelchair. Unless the disabled person in a wheelchair was able to stand, this toilet would be completely inaccessible. The person would require to be escorted to the closest adapted toilet by a DCO.

There are no induction loops on phones, and there is no magnification equipment available in the HR to assist communication with people with audible or sight challenges. We had welcomed the introduction of Vasco translation devices, but these have now been removed due to a fault. Samsung translator tablets were rolled out in December '22 / January '23. Staff can now use Google translate for any general communication, and Big Word for more important issues.

Magazines in various languages have been removed due to Covid safety measures. A prayer mat can be provided on request.

As with the two other non-residential HRs (airports), there is no access to fresh air or natural light. An authorised smoking area is also not available at these locations.

The number of people held in the HR in the period covered by this report is shown in the statistics (see Annex).

2.7 Edinburgh airport holding rooms

The holding facility is situated at the south-eastern side of the airport.

Inside the holding facilities is a waiting area with the UKBF facilities, comprising two interview rooms and a fingerprint/photography room.

There is also an area with two large cubicles with curtains: these are, effectively, small offices where the induction process takes place. Detained people are searched, and their personal possessions logged and placed in storage within the adjacent lock fast store. Food stocks are also held in this store. The HR itself comprises of three spaces arranged around the corridor. Firstly, there is the staff area which incorporates an accessible toilet and a kitchen/dining space adjacent to the main workspace. A large, half-glazed (i.e. above desk height) window and door separate the main HR, which is equipped with seating for eight people, and a large, low table with various magazines newspapers and information folders. There is a TV on the wall and various notices.

There are two accessible toilets, both of which have blanking plates where the normal grab rails etc. should be fitted and this work was scheduled for May 2023. There is a drinking

fountain which was deactivated during the pandemic and remains out of use with bottled water being available instead.

To the left of this main space is the family area which is separated by a half-glazed partition and door. This also has seating for eight people and a higher table, again with various magazines and newspapers. There are toys for younger children, a baby changing facility and a further TV.

While there are no showering facilities in the HR, Mitie C&C provide passengers on arrival at the HR with hygiene packs that contain toothpaste, toothbrush, soap/gel, wash cloth & comb. A full change of clothing also is provided from underwear to outerwear. This can impact on the welfare and dignity, particularly of those detained overnight.

Also, as with other airport HRs, an initial basic health check is made when the IS91 is prepared. However, there is no healthcare provision available so if the C&C DCO's are concerned about the immediate health of a detained person they are required to contact the airport duty officer who would then dispatch an airport first aider to provide first response medical assistance.

During the reporting year, the Vasco translation devices were still in use. However, there is now a Samsung tablet translation device which appears to work better and should be authorised for full use.

All facilities are adequately heated but there was an issue over the Christmas 2022 period which rendered the heating inoperative and took an excessive amount of time to be rectified. The ventilation remains worthy of upgrading.

3. Executive summary

3.1 Background to the report

This report presents the findings of the Scotland and Northern Ireland STHF IMB for the period 01/02/2022 – 31/01/2023. The content of this annual report is informed by the Board's onsite visits, which resumed following Covid-19 restrictions on access. The Board considers evidence from observations during regular visits to each establishment, scrutiny of records and of data and informal contacts with detained people and staff. However, the Board is still operating a mixture of site visits and telephone interviews with DCOs at Aberdeen pending recruitment of local representation on the Board.

This report highlights a number of salient cross-cutting issues including:

- Medication being removed from detained people.
- Long taxi journeys late at night as detained persons are moved to other locations within the detention estate.
- The lack of provision within the immigration detention estate, within our remit, for people in detention who have disability issues. Including, but not limited to, lack of showering facilities.
- The increase in the number of people detained for more than eight hours in holding rooms which are not equipped or suitable for this.
- That holding rooms are in a number of cases not suitable for their intended purpose, with one at Prestwick airport, totally unsuitable [see section 2].
- That generally, there are very few windows with openings to allow for the free flow of air within all HRs and the residential STHF, so the ventilation systems are not adequate.

3.2 Main judgements

How safe is the STHF?

Generally, we have found the facilities to be safe for those without disabilities. However, we are concerned that the majority of HRs and the RSTHF do not meet the current national disability access standards and we are aware that a disability audit across the detention estate has been carried out. At the time of writing the outcomes are awaited.

We are also concerned that the planned building alterations, to ensure the safety and dignity of female detained people held at Larne House RSTHF, have still not yet been implemented.

How fairly and humanely are detained people treated?

We have observed that detained people are treated in a respectful and caring manner by the C&C DCOs and by UKBF staff, who work empathetically to maintain a caring culture within the HRs and the STHF. We would note, however, that we have not been able to comment on their overall treatment, particularly as they are moved across the detention estate.

How well are detained persons' health and wellbeing needs met?

We remain seriously concerned that the Home Office has still not satisfactorily resolved the major issue regarding detained people's medication. Personal medicines are removed,

we are told for safety reasons, when people enter the detention estate. We have not seen evidence that there is a satisfactory regime for making sure that each person then receives their medicine at the prescribed time. This has the potential to present serious health risks to those who need to take their prescribed medicines regularly.

How well are detained people treated on transfer or removal?

We have noted that there has been an unacceptable increase, compared to previous years, in the time that some detained people are held in some airport HRs and IRCs (see the Annex). We are also concerned about the methodology of late night transfers to establishments south of the border.

3.3 Recommendations

TO THE MINISTER

Prescription medication

We highlighted in our previous reports our concern at the removal of prescription medication from detained people. This remains a serious concern and discussions with the Home Office have not, thus far, produced a solution.

We would urge the Minister to request that the Home Office carry out an urgent assessment of the risks to detained people as a result of the removal of their prescription medications. These risks should then be taken into account when designing a practical strategy for ensuring that detained people receive their appropriate medication. The desired outcome would be that the health and wellbeing needs of all detained people are met.

Disability access

We welcome the Disability Access audit that is being implemented across the estate and look forward to any upgrading that the audit recommends being implemented.

Length of stay in airport HRs

The maximum length of time that a person can normally be held within the airport HR was previously increased from five to eight hours.

The average maximum length of time that individuals were detained within the airport HR has increased from five hours to eight hours. We consider this extended timescale is not appropriate considering our view that the current HRs are unsuitable for this length of stay, because of their cramped size and lack of fresh air circulation. There continues to be an increase in the number of people being detained at Glasgow and Edinburgh for more than eight hours, and in some cases overnight. Both HRs are unsuitable for this given that there are no basic hygiene facilities, such as showers.

Firstly, the Minister is urged to review the decision to increase the maximum length of stay to eight hours. Secondly, we would ask that the Home Office identify and address the reasons for the considerable increase, compared to previous years, in numbers of people being detained in the Glasgow and Edinburgh airports HRs for more than eight hours. The desired outcome, for both recommendations, would be that detained people experience a more humane experience during their stay in a STHF.

Holding rooms at Edinburgh airport

The Board continue to be concerned that people are still being held for unacceptable lengths of time at the landing gates at Terminal 2 despite assurances from UKBF that there are now enough airside drivers to escort those detained to the HRs in Terminal 1. The facilities at the gates are not appropriate for detention and the Board consider the dignity and humane treatment of detained people to be adversely affected by this. Our recommendation, in last year's annual report, that a new HR facility be set up in Terminal 2 was partially accepted by the HO.

We suggest, in the light of the delays and the requirement to provide facilities compliant with disability access requirements, that the Minister reconsiders the decision to partially accept our recommendation for a HR in Terminal 2, and to now fully commit to the recommendation. The desired outcome would be that the delays in people being transferred from the control desk to the HR would be reduced and the facility would comply with disability access requirements. Hygiene facilities such as showers could be incorporated in the new HR, thus providing for the fair and humane treatment of all detained people.

TO THE UK BORDER FORCE / HOME OFFICE IMMIGRATION ENFORCEMENT

Communication with detained people

We welcome the introduction of the Samsung translation device now partially in use at Edinburgh airport.

Recommendation

We would recommend a review with consideration being given to standardisation of the translation devices across all of the facilities.

Ventilation

Covid-19 has highlighted the impact on health of inadequate ventilation and that all premises where people can congregate should be well ventilated. We are aware that people are held in the HRs and the RSTHF sometimes for long periods and that there is an absence of natural light and air circulation within these premises.

We still recommend that, as a first step, UKBF, Immigration Enforcement (HOIE) and C&C undertake a technical risk assessment of their premises.

Should the assessment advise that appropriate forced air ventilation be installed, we then urge that the work is given priority status. The desired outcome would be that the health and wellbeing of detained people and the staff working in those establishments are maintained.

Recommendation

That the appraisal of the ventilation arrangements at all facilities is undertaken as a matter of urgency.

Glasgow Prestwick Airport Holding Room

The Board are concerned that individuals are held unattended in the CWA, whilst awaiting a bail decision or to be transferred to another immigration detention establishment, such as Dungavel IRC. This can be for over an hour, and we are concerned that UKBF officers monitor the safety and security of those detained, remotely from their office. This practice

relies on officers continually viewing a TV monitor and we are not satisfied that this is practical. The time taken for officers to respond to an emergency and get to the CWA must impair the safety and security of those in detention.

Recommendation

We recommend that the CCTV monitoring of the HR be brought to an end and that the adjacent office section be manned when persons are detained within the HR. Also, we requested, in our previous annual report that the missing section of elevator, which had been removed and stored elsewhere in the terminal, be also brought back into service. The desired outcomes of these recommendations would be that detained persons, including those with disabilities, would be detained within a safe and secure facility, appropriate to their needs.

Prestwick airport HR

The Board is of the opinion that the HR is not fit for purpose because detained people who are wheelchair users have to negotiate two flights of stairs (there are no lifts or elevators). There is also the absence of Wi-Fi and CCTV throughout the facility. There is no toilet, and certainly no disabled accessible toilet, within the HR so detained people are therefore required to be escorted to toilet facilities elsewhere in the terminal building. The UKBF officers are using the controlled waiting area for detention and there is CCTV there. The maximum time that a detained person can be held there is one hour, after which they must be transferred to Dungavel IRC or the Glasgow airport holding room. However, both solutions would result in the person being detained at the control desk for a length of time exceeding the one hour maximum.

Recommendation

We recommend that the HR be brought up to basic requirements by UKBF installing portable secure Wi-Fi and connecting a CCTV system to it. We understand that a section of elevator had been removed and stored elsewhere in the terminal. It could be brought back into service. The desired outcome would be that any individual detained is held within a safe and secure facility, appropriate to their needs.

TO THE FACILITY MANAGER / DETENTION CONTRACTOR

Larne House RSTHF

We stated earlier our concern that the work to provide safe and private facilities for women within this establishment is still outstanding. The Home Office committed, in their action plans in response to the Board's previous recommendations, to undertake this work. We consider the lack of progress to be unacceptable and are awaiting a detailed action plan with target milestones towards completion. The desired outcome should be that the safety and dignity of women in detention can be assured.

The bedrooms within Larne House RSTHF urgently require upgrading. The beds are not fit for purpose and there are no seats available for detained people to use in their rooms for private use. A trial bedroom has been re-equipped and we would recommend that all bedrooms be brought up to this standard.

Recommendation

The Board wishes to see target dates for the implementation and completion of work to provide safe and private facilities for women in Larne House RSTHF, as well as the

upgrading of all bedrooms Larne House in line with the trail, re-equipped room.

Drumkeen House

The board has observed potential difficulties within the physical arrangements are such that detained persons can only enter/exit the two holding rooms by going through the office area.

Recommendation

That an assessment is carried out to establish if the facilities are fit for purpose at Drumkeen House.

Holding rooms at Edinburgh airport

The decor and general furnishing at Edinburgh airport HRs are in real need of redecoration. We understand that this work is being looked at for implementation.

We are also waiting the installation of a flight monitor and the replacement of the old TV sets in the two holding rooms.

The Board remains of the opinion that a new holding room is required at terminal 2 at Edinburgh airport.

3.4 Progress since the last report

The Board acknowledges that a number of the issues brought to the attention of the relevant agencies have been successfully resolved during the reporting year.

We are, however, seriously concerned that a substantial number of our concerns have still not been resolved.

We were, however, grateful to the Home Office for updating us, at our Board meeting on 3 February 2023, on the progress made against their action plan issued in response to our 2021–2022 annual report. The outstanding issues are listed in the following table:

Issue	Concern	Status
Prescription Medications	Removal of prescription medications from persons in detention	Ongoing
Disability Access	Disability Audit	Ongoing
Length of stay in Airport Holding Rooms	Length of time that individuals are kept in Holding Rooms	Not accepted
Edinburgh Airport	Requirement for additional Holding Room to be provided in Terminal 2	Ongoing

Communications with detained people	Improvement in communication devices	Ongoing
Ventilation of Holding rooms	Upgrading of ventilation systems to improve air quality in Holding Rooms	Ongoing
Larne House Segregated facilities	Building works to separate male and female persons in detention	Ongoing
Larne House Bedroom Furnishings	Furniture to be upgraded	Ongoing
Edinburgh Airport Holding rooms	Redecoration and new furnishings required	Ongoing
Prestwick Airport	Reinstallation of chair lift	Ongoing

Evidence sections 4–7

4. Safety

Last year we indicated that the Board would be looking at how safety considerations are addressed and how the safety of people held within the facilities is assured or impacted upon by the physical characteristics of the holding facilities. We were especially concerned about the suitability of the facilities in terms of equalities legislation (particularly those areas previously covered by Equalities Act legislation).

The Board has subsequently carried out a review of the accommodation at the establishments that we monitor, and the results of the review are given in section 5.

4.1 Reception

The Board finds that the reception and induction process of people in detention is properly and competently undertaken. The relevant paperwork is duly completed and IS91s are inspected during each of our visits. In previous annual reports, we expressed our concerns that diligence in completing the risk sections (parts 3 and 4 of the IS91s) have not been consistently completed. We are, however, now pleased to report that there has been an improvement and that the risks associated with detained people are now in the main duly recorded and when required, action plans are prepared for young and/or vulnerable people.

Generally, the Board have observed detained people to be treated, on arrival in detention, in a humane and caring manner by DCO's. Induction has in the main been conducted efficiently and effectively and DCOs have been adequately trained to identify when individuals are deemed to be vulnerable. The Board are satisfied from what we have been able to monitor that DCOs complete the paperwork to ensure that detained people with vulnerabilities are cared for appropriately.

The introduction of electronic Vasco translators last year has now been discontinued due to a data security issue. There are signs in all HRs indicating the availability of a translation hotline provided by Big Word and staff use Google translate when needed. We are monitoring the continued need for translation devices.

4.2 Suicide, self-harm, deaths in custody

We can report that, over the reporting period, there were no deaths in detention in the facilities monitored by the Scotland & Northern Ireland STHF board. It is understood that holding room staff are trained to identify any risks of self-harm.

5. Fair and humane treatment.

The Board is generally satisfied from our observations that those who are detained within the HRs and STHFs are treated, in an equal, caring and fair manner. We acknowledge that there has been significant progress in the refurbishment of the toilet at Glasgow Airport Holding Room to accommodate any detained individuals with disabilities.

We continue to have concerns regarding the current suitability of other HRs, in particular to accommodate detained individuals with disabilities. While there are 'accessible' toilets in the bother holding rooms that do not achieve full compliance.

With regard to faith and religious requirements, we are satisfied that a comprehensive and diverse variety of religious literature, including Bibles and the Quran, are available to detainees from a wide number of faiths. Prayer mats, and at least one Qibla, are available at all locations. While not all DCOs were aware of the significance of special days/festivals for detainees arriving in the HR, a calendar of notable religious festivals has been made available at each facility. Whilst some HRs had a jug for water in the toilets for use by detainees who are Muslim, this was not the general case.

There is adequate provision of foods (Halal, Kosher etc.) in all HRs to meet the dietary and religious needs of those detained. Halal certificates are displayed to indicate suitability. There are now notebooks in some facilities with photos of food, which helps detained individuals who do not use English as a first language to select their food. In the event of the detention of those with children, the Board have been told that arrangements were made with local establishments to provide supplies if they were not available within the Holding Rooms.

There are no signs in Braille, in any of the HRs or STHFs, for those with sight or hearing difficulties and there are no text relay services or translation devices (such as Babel) to translate information into different languages for the hard of hearing. We are, however pleased to be advised that disability awareness training continues to be undertaken by UKBF Officers, and C&C DCOs.

Observations

Aberdeen airport (ABZ)

The HR is generally accessible. Access doors are sufficiently wide enough and there is maneuvering space for those using wheelchairs. The toilet facility is easily accessible for independent use by a disabled person. Appropriate grab rails are fitted, and there is a colostomy shelf and sanitary products are within reach of a wheelchair user. There is an alarm pull cord and the wash hand basin, wall drier and sanitiser are all within easy reach of the wheelchair user. There is a wheelchair accessible shower available but there are no grab bars at the side of the shower, and no stool/chair.

The UKBF staff have completed initial disability awareness training and they have access to regular online refresher/update awareness training.

With regard to audio, visual and hidden disabilities, there are no induction loops on phones, and there is no magnification equipment available in the HR. Unlike other HRs, there isn't a Vasco translator available for UKBF officers to communicate with those who don't speak English.

CCTV is in operation at all times. Finally, UKBF officers have received training in identifying persons with disabilities that are not visible or immediately obvious.

Drumkeen Reporting Centre

Drumkeen has two dedicated HRs which can be used to detain men and women separately. Both are relatively small, and the entrance doors would not accommodate the maneuvering of a standard size wheelchair. Provisions would therefore have to be made elsewhere in the reporting centre, for wheelchair users.

There are no induction loops on phones and there is no magnification equipment available in the HR, to assist communication with people who have audible or sight challenges.

The Care & Custody (C&C) staff have received and continue to receive appropriate disability training, including identifying those with hidden disabilities.

CCTV is in operation at all times.

Edinburgh Airport (EDI)

Entry to the HR is appropriate for wheelchair users and the doors are wide enough to allow wheelchair entry.

The DCOs have received and continue to receive appropriate disability training, including identifying those with a disability that is not visible or immediately obvious.

With regard to audio, visual and hidden disabilities, there are no induction loops on phones and there is no magnification equipment available in the HR.

There is a fully charged translation device available for C&C officers to communicate with those who do not speak English.

CCTV is in operation at all times.

Festival Court Reporting Centre (RC)

There is one HR at this RC and two small toilets within it. The toilets have not been equipped for use by those with disabilities including persons using a wheelchair. While the entrance to the HR is wide enough to accommodate a wheelchair, a detained person must enter/exit the HR by passing through the DCO office where space is very limited. It would be very difficult to maneuver a wheelchair within the tight office and HR spaces. Therefore, a wheelchair user would require to be held elsewhere within the RC building. There is a disability accessible toilet situated at the reporting reception area and an inspection of this revealed that it does not have a shelf for a colostomy bag nor are there sanitary products available, the height of the toilet is below the recommended 480mm (from floor to top of toilet seat), there is no alarm pull cord, and the wall mounted hand drier is far too high for access by a wheelchair user. Any detained person in a wheelchair is dependent on the help of DCO staff to access this toilet.

There are no induction loops on phones, and there is no magnification equipment available in the HR, to assist communication with persons with audible or sight challenges. There is however a working Vasco electronic translator available in the HR.

The DCOs have received and continue to receive appropriate disability training, including identifying those with a hidden disability.

Full CCTV is operating within the HR.

Glasgow airport (GLA)

The detention suite consists of two separate HRs, one large and one smaller one. The DCO office is situated between the HRs, and DCO's can see detained people in each HR through a one-way glass panel. The access doors to both HRs are less than the recommended (900mm) so wheelchair access is very difficult.

There are no induction loops on phones, and there is no magnification equipment available in the HRs, to assist communications with persons with audible or sight challenges. The DCOs have received and continue to receive appropriate disability training, including identifying those with a hidden disability.

CCTV is in operation at all times.

Larne House RSTHF

This facility is much larger than the HRs in the other establishments audited and benefits from having a qualified medical practitioner (nurse) present in the RSTHF at all times. Each detained person is medically assessed on arrival at the RSTHF, so staff are aware, at an early stage, about disabilities and general health issues. As with other C&C managed centres, staff regularly undertake appropriate training to be aware of the requirements of those with disabilities and the identification of those with less visible disabilities and vulnerabilities.

Generally, people can move around the RSTHF with a wheelchair. However, the width of the entrance door to the bedroom designated for use by a disabled person is less than 900mm wide and does not open outwards. This will considerably reduce the capability of most wheelchair users to gain independent entry, and to maneuver within the room. The bed is also fitted with a fixed 'cot type' side which potentially presents a considerable obstacle for independent use by people with a variety of disabilities. A disabled person would therefore have to be lifted by C&C staff into bed. Equally they would require assistance to get out of bed. The dignity of the individual is greatly impacted adversely by these points.

There is an easily assessable dedicated toilet for those with disabilities. Sanitary products are available but out of reach of a person in a wheelchair, because the shelf is too high. Also, a shelf for a colostomy bag is not available.

Induction loops for those with auditory disabilities are fitted within the RSTHF and Wi-Fi is readily available. However, there is no magnification equipment available to assist communications with persons with sight challenges. As stated above, the DCOs have received and continue to receive appropriate disability training, including identifying those with a disability that may not be visible or immediately obvious.

There is full CCTV coverage throughout the RSTHF.

Prestwick Airport (PIK)

The HR is situated on the second floor, and the UKBF control desk is on the ground floor. There is a wheelchair elevator linking the ground and first floors, but the section linking floors 1 and 2 has been removed. A wheelchair user could not therefore, be transferred easily to the HR. However, the corridors and entry doors are wide enough to allow a wheelchair to be maneuvered into the HR. PIK supports a very limited number of flight arrivals so detained people are normally held at the control desk and then either bailed or

transferred to an IRC. There is full CCTV coverage at the control desk, unlike the HR, so this is a further reason for using the control desk area for detentions. Also, there are no toilet facilities, disability accessible or otherwise, within the HR area, however there is a disability accessible toilet within reach of the control desk. It is important to note, however, that a detained person would not be able to use this facility independently and would have to rely on a UKBF officer to assist them. PIK has normally only two officers on duty, so it is debatable whether this arrangement is sufficient to ensure the welfare of a disabled person. The disability accessible toilet does not have a shelf for a colostomy bag nor are there sanitary products available. Wall mounted driers and sanitisers are within easy reach of a wheelchair user. There are no showering facilities available for use by detained people.

The UKBF staff have completed initial disability awareness training and they have access to regular online refresher/update awareness training. Officers have also received training in identifying people with non-visible or immediately presenting disabilities.

There are no induction loops on phones, and there is no magnification equipment available to support communications with persons who may have audio, visual and hidden disabilities.

Unlike other HRs there isn't a Vasco translator available for UKBF officers to communicate with those who don't speak English.

The PIK HR does not have CCTV.

Faith and religious affairs

With regard to faith and religious requirements, we are satisfied that a comprehensive and diverse variety of religious literature, including Bibles and the Quran, is available to detained people from a wide number of faiths. Prayer mats, and at least one Qibla, are available at all locations. Some HRs had a jug for water in the toilets for use by detained people who are Muslim; however, this was not the case everywhere and should be provided across the estate. Staff should maintain a dignified and proactive approach in providing for the spiritual needs of detained people of all faiths.

6. Health and wellbeing

6.1 Healthcare: general

All detained people are assessed as part of the induction to the Larne House RSTHF. There is a dedicated medical room which is fully equipped to give immediate assistance to anyone detained should they require it. When a detained person is admitted to Larne House, he or she is assessed for detention suitability. The resident duty nurse undertakes a review of any medications brought in with the individual and makes a general assessment of their health situation. A fully qualified nurse is on duty 24 hours a day, seven days a week throughout the year.

At Aberdeen, Edinburgh and Glasgow airport holding rooms, a basic health check is made when the IS91 is prepared. However, there is no healthcare provision available, so if the UKBF officer is concerned about the immediate health of a detained person they can contact the airport duty officer who then dispatches an airport first aider to provide “first response” medical assistance, or call an ambulance if deemed necessary. However, the Board note that individuals detained at Glasgow Prestwick Airport (PIK) are held in the controlled waiting area and monitored via CCTV by the UK Border Force staff in an office two floors away. The Board do not feel that this arrangement is appropriate. Due to the time taken for an Officer to respond in an emergency could have life threatening consequences, should a detained individual become unwell.

At Drumkeen House and Festival Court reporting centres, there are also no healthcare services available, only the availability of a first aider for an emergency.

There is inadequate space in HRs at the airports to hold more than about four people in each room and this will be exacerbated when airline flights return to their earlier frequency with increased passenger volume. This may also become a health and wellbeing issue at Larne House if detention numbers increase.

The potential problems of the current process that requires detained people to surrender their prescription medications to a DCO upon entry to the HRs; for various health reasons remains a matter of concern for the Board. Personal medicines are removed, we are told for safety reasons, when people enter the detention estate. We have not seen evidence that there is a satisfactory regime for making sure that each person then receives their medicine at the prescribed time. This has the potential to present serious health risks to those who need to take their prescribed medicines regularly.

7. Removal, transfer or release

Post Covid-19 pandemic, we are resuming the monitoring of removal flights. The DCOs have also been observed in escorting duties from the Holding rooms, through the airport and on to the aircraft.

At Larne House RSTHF, people may be detained for up to seven days where Removal Directions (RDs) have been served. Where these have not been served, the maximum period of detention at the RSTHF is five days. Thereafter, any detained people must be released (unconditionally or temporarily on immigration bail), removed from Northern Ireland, or transferred to an Immigration Removal Centre (IRC) in GB as there is no appropriate resource available in Northern Ireland. It is noted that this did not happen in 125% of cases.

At Glasgow Airport holding rooms, the average length of stay in detention during the reporting year was 5 hours. However, there have been occasions when people have been held overnight in the HR due to difficulties in other facilities or staffing issues. A basic temporary type of lounge bed is available for this. We have noticed that, increasingly during this reporting period (see Annex), people have been held for periods of up to eight hours in the HRs. They are then normally transferred to Dungavel IRC, removed on a return flight the same day or bailed to the community.

At Edinburgh Airport holding rooms the average length of stay is just over four and a half hours, but some people are held overnight, when they are due to join an early flight the next morning. Basic 'temporary' type lounge beds are provided for this. Detained people have been held for periods of up to eight hours or more in the HRs. They are then usually transferred to Dungavel IRC or removed on a return flight the same day.

As there are no IRC family facilities within Scotland, families with young children may be held for prolonged periods in the holding rooms awaiting transfer to England. These transfers can take place late at night, after hours of being detained, giving families a long stressful journey south. This is not ideal, especially for young children. The Board will be focusing on this deficiency in the year ahead.

Data on the length of detentions in these facilities is provided in the annex.

The work of the IMB

Role

The Board normally undertakes its role of monitoring the welfare of detained people, held in immigration HRs and the RSTHF at Larne, by carrying out regular unannounced monitoring visits to each of the establishments.

The majority of our monthly Board meetings have also had to be conducted partly in person, partly virtually, by video calls.

Larne House STHF:

Board members normally visit once fortnightly. A recommendation in the Shaw Review was that more frequent visits should be made by the Board and that a number of these visits should be carried out during the evening and night. The frequency of visits is largely governed by the budget provided by the HO and distributed through the IMB Secretariat. We have now replaced a member resident in NI. We hope, however, to add to this through our current recruitment campaign. Successful recruitment will give us additional flexibility in covering monitoring responsibilities at both Larne House and Drumkeen House.

Aberdeen airport holding rooms:

Three members are now visiting the holding Room at Aberdeen airport.

This was an introductory visit as the Board, having taken on this role had not received full passes. Once the passes had been issued the board commenced it's full duties. We were welcomed by the UKBF team. The team have continued to be helpful and supportive to us.

Our monitoring schedule is, currently, one in-person visit, and one phone call each month.

Prestwick airport holding rooms:

Since the first visit to Prestwick airport HR in May 2021, regular rota visits have taken place.

Our monitoring schedule is one in person visit, and one phone call, each month.

Board development

Members continue to avail themselves of online training. Members recruited in 2020 have taken on significant roles within the team including Information Officer, Chair, Vice Chair and Board Development officer. The Chair, Vice Chair and Board Development officer have all attended courses pertinent to their roles and the Chair has trained as an IMB Mediator.

Working with other agencies

We continue to benefit from the commitment of other agencies: UKBF, Home Office Immigration Enforcement and C&C to keep us fully informed as we monitor the safe and humane treatment of detained people within the HRs and the STHF. Senior officers from each agency regularly attend our monthly Board meetings and are always prepared to answer our questions. Their participation and willingness to respond to our scrutiny, at an early stage, has led to us developing deeper understanding of, sometimes complex, issues and has helped us to effect faster resolution of our concerns.

The Board statistics are given below.

Annex

<u>Board Statistics</u>	Current Reporting Year	2021-22	2020-21	2019-20
Board Membership (Recommended)	12	12	12	12
Actual Membership at start of the Reporting Period	7	9	12	9
Actual Membership at end of that Reporting Period	11	7	10	7
Members Attendance at Board Meetings (%)	70.5*	92	74	49
Number of Monitoring Visits (% of which were On-Site)				
Glasgow Airport (GLA) Holding Rooms	43 (88)	37 (65)	43	35
Edinburgh Airport (EDI) Holding Room	43 (81)	40 (47.5)	36	33
Aberdeen Airport (ABZ) Holding Room	18 (39)	9 (44)	N/A	N/A
Glasgow Prestwick Airport (PIK) Controlled Waiting Area (CWA)	20 (40)	9 (55.5)	N/A	N/A
Festival Court Reporting Centre (RC) Holding Room	40 (70)	39 (74)	25	32
Drumkeen Reporting Centre (RC) Holding Rooms	17 (12)	18 (5.5)	12	3
Larne House Residential Short Term Holding Facility (RSTHF)	18 (22)	17 (6)	13	16

*there were two members on long term sabbatical leave and their absence is included in this figure.

Number of Persons Detained	Current Reporting Year	2021-22	2020-21	2019-20
Glasgow Airport (GLA) Holding Rooms HR (% held for 8 hours or more)	467 (12%)	149 (29)	150 (7)	531 (8)
Edinburgh Airport (EDI) HR (% held for 8 hours or more)	1031 (17%)	430 (38)	222 (6)	582 (7)
Aberdeen Airport (ABZ) HR (% held for 8 hours or more)	56 (0)	51 (6)	N/A	N/A
Glasgow Prestwick Airport (PIK) Controlled Waiting Area (CWA) (% held for 8 hours or more)	0	2 (0)	N/A	N/A
Festival Court Reporting Centre (RC) HR (% held for 8 hours or more)	46 (15%)	55 (7)	39 (3)	161 (0)
Drumkeen Reporting Centre (RC) Holding Rooms	101 (0)	36 (0)	12 (0)	28 (0)
Larne House Residential Short Term Holding Facility (RSTHF) (% Held in the RSTHF for more than 5 days)	349 (15.5)	116 (6)	315 (2)	1724 (2)
Number of Detained Persons who were identified as Vulnerable				
Glasgow Airport (GLA) Holding Rooms	27	9		
Edinburgh Airport (EDI) Holding Room	37	15		
Aberdeen Airport (ABZ) Holding Room	0			
Glasgow Prestwick Airport (PIK) Controlled Waiting Area (CWA)	3			
Festival Court Reporting Centre (RC) Holding Room	2	1		

Number of Detained Persons who were identified as Vulnerable (continued)	Current Reporting Year	2021-22	2020-21	2019-20
Drumkeen Reporting Centre (RC) Holding Rooms	16	15		
Larne House Residential Short Term Holding Facility (RSTHF)	54			
Detained Families Group (number of accompanied children)				
Glasgow Airport (GLA) Holding Rooms	41 (65)	11 (25)		
Edinburgh Airport (EDI) Holding Room	70 (69)	11 (19)		
Aberdeen Airport (ABZ) Holding Room	3 (0)			
Glasgow Prestwick Airport (PIK) Controlled Waiting Area (CWA)	0			
Larne House Residential Short Term Holding Facility (RSTHF)	0			

Notes:

All figures provided are from locally held management information and not officially produced statistics.



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