



Annual Report of the Independent Monitoring Board at the South and East Short-Term Holding Facilities

**For reporting year
1 February 2024 to 31 January 2025**

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Introductory sections 1 – 3

1. Statutory role of the IMB

The South and East Independent Monitoring Board (the Board) is appointed by the Home Secretary to monitor and report on the welfare of people in various short-term holding facilities (STHFs) in the South and East of England through observation of their treatment and of the premises in which they are held. Board Members are publicly appointed volunteers.

The Board conducts its work in line with the Short-Term Holding Facility Rules (the 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 Board (referred to in the Rules as the Visiting Committee). The Board has unrestricted access to every detained individual and all immigration detention facilities and to most records for the STHFs that it monitors. Board members always have full access to all parts of the facility and can speak to detained individuals outside of the hearing of officers. Board members must consider any complaint or request which a detained individual wishes to make to them and make enquiries into the case of any detained individual whose mental or physical health is likely to be injuriously affected by any conditions of detention. The Board must inform the relevant STHF manager about any matter which it considers requires attention, and report to the Secretary of State about any matter about which it considers 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 STHFs it monitors, 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. OPCAT 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 Board is part of the United Kingdom's National Preventive Mechanism.

2. Description of the holding rooms

The STHFs at Gatwick, Luton and Stansted airports, and the immigration centre at Lunar House (now replaced by 2 Ruskin Square) in Croydon, are all managed by Mitie Care and Custody (C&C). Each of these STHFs has broadly similar facilities, including a main holding room, a family room, access to hot drinks, a TV, newspapers and religious texts in a selection of languages, children's toys and books and a pay phone, which can be used in some locations for outgoing calls and will accept incoming calls.

In each of the airport STHFs, there is limited space for people to sleep on the floor, with room only for a few mattresses to be laid out, assuming they are available. When there is no space on the floor, the only alternative is to sleep on the chairs. Unrelated men, women and vulnerable detainees may sleep in the same area unless the family holding room at the relevant location is free.

Aeromed healthcare professionals are available at Gatwick, Luton and Stansted Airports, but not at any other location monitored by the Board.

Gatwick South Terminal STHF is the only airport holding room with a disabled toilet facility, which is unisex. There are no other support systems for people with limited mobility, sight or hearing impairment available at the airport STHFs.

There are no shower facilities at the airport STHFs, apart from at Gatwick South Terminal and Southend.

Detained persons are monitored by staff through observation windows. CCTV monitoring is available at all airports, other than Southend.

None of the airport STHFs has access to natural light or an exercise area.

Gatwick North Terminal: In the main holding room, there are 15 seats and separate male and female toilets. In the family holding room, there are seven seats and a unisex toilet. Detained persons' luggage and personal effects are not stored securely. There is limited space for C&C to conduct induction interviews.

Gatwick South Terminal: In the main holding room, there are 28 seats, separate male and female toilets and a separate shower. In the family holding room, there are 12 seats and a unisex toilet with a shower. There is no private space for C&C to conduct inductions.

Luton Airport: Both the main and family holding rooms have 10 seats each. Toilets are available in each room, but there are no showers. No private space is available for C&C to conduct the inductions for detained people. Luggage is stored in a room, alongside food. Access for people with disabilities is very limited. There is no hot food apart from instant noodles.

Stansted Airport: In the main holding room, there are 14 seats and separate male and female toilets, with baby changing facilities in the female toilet, but no showers. Within the main holding room is a small family holding room. There is no private space for C&C to conduct the inductions for detained people. Detained persons'

luggage and personal effects are stored in lockable cupboards in a room, which does not have CCTV.

Southend Airport: This facility is managed by Border Force (BF). There are two separate holding rooms, with capacity for eight and four people respectively; neither room has CCTV monitoring. Each holding room has a unisex toilet.

Neither holding room contains a TV or DVD player. The facility includes two interview rooms, where inductions can be conducted in private.

There are no hot food or hot drinks available. There is a small supply of bottled water and cold and dried food is available.

Lunar House/2 Ruskin Square (Immigration Reporting Centre): Lunar House, which had two holding rooms, was replaced in November 2024 by a newly built facility at 2 Ruskin Square. In the main holding room at 2 Ruskin Square, there are 28 seats. In the separate family holding room, there are 22 seats. Both rooms have unisex toilets and disabled facilities, but neither has showering facilities. Inductions are conducted behind a curtained area.

There is natural light in both holding rooms.

Summary of the shipping ports: The STHFs at each of the shipping ports monitored by the Board are managed by Border Force (BF).

London Tilbury Port: There are two distinct port areas: Tilbury 1, which is the original facility, and Tilbury 2, a considerably newer area, which is only staffed when individuals are detained. Tilbury 1 is only used as overflow, but was not used during this reporting period.

Tilbury 2's holding facility: This is in a well-appointed, large modern portacabin, with separate male and female toilets, showers and wash hand basins. Individuals in either of the two holding rooms can be easily monitored from windows in the BF office, which is situated between the rooms, and CCTV cameras cover both holding rooms.

Facilities for those with limited mobility are provided within the holding room at Tilbury, although no hearing loop is provided.

Cold food and hot drinks are available within the facility.

Port of Purfleet

The new facility was commissioned in the autumn of 2024 and, as a result, individuals who have arrived at Purfleet can now be cared for on site.

The BF office sits between the two holding rooms, one of which is larger and designated as a family room. Officers can monitor residents through one-way windows, as well as via a CCTV system.

Each holding room has ensuite shower and toilets, as well as tables and chairs. Cold food and drinks are available within the facility.

Port of Felixstowe: In the opinion of the Board, this STHF does not provide a humane place for holding people. The STHF is a small, dilapidated portacabin sited in a huge hangar. There is a freestanding chemical portable toilet outside the facility,

to which detained persons need to be escorted. There are two sleeping mattresses and pillows. There is no disabled access. The port authority has agreed to relocate the STHF to an existing building, which is adjacent, but some partitioning, plumbing and IT issues have still to be finalised. Once completed, the new facility should be ideal for purpose, in the Board's view.

Port of Harwich: The STHF has two holding rooms, each with a capacity of four people. Both have a toilet, shower, drinking fountain and washing facilities. One of the holding rooms is fully accessible and has baby-changing facilities. There is also a separate family holding room near the arrivals area, with a sofa, bean bag, chair, television, DVDs and games.

The facility is staffed by BF officers only when detained persons are being held there. BF interview rooms are available close to the arrivals area. Officers may monitor detained persons through windows into the holding rooms and with CCTV.

There are four sleeping mattresses and seven pillows.

3. Key points

3.1 Background to the report

The Board has monitored the activity across all of the above locations throughout the reporting period. At sites where there is less activity, Board members contact the site through phone interview.

When appropriate, BF staff make direct contact with IMB members at Southend, Tilbury, Purfleet, Harwich and Felixstowe (for example, where there is limited activity).

The data used in the report is provided monthly by the Home Office Escort Contract Monitoring Team. Data gathered during monitoring are clearly identified.

3.2 Main findings

Safety

The Board is very concerned about the size of the accommodation, especially at Luton Airport. On one day in January, the Board observed so many people sleeping on the floor that it was extremely difficult to walk through to the family room.

Fair and humane treatment

The Board has observed C&C officers, sometimes in situations that are stressful and emotional for those in their care, carrying out their duties with tact and sensitivity. Those members of staff with multi-language skills have been observed using these skills to support detained persons and other members of staff.

For the third year in succession, the Board draws the Home Office's attention to the capacity issues at many of the airports' STHFs and the fact that the needs of those with mobility, hearing or sight impairment issues are still not being adequately addressed.

In the opinion of the Board, the STHF at the Port of Felixstowe does not provide a humane place for holding people.

Under the STHF rules, passengers should not be detained for longer than 24 hours, other than where a longer period of detention is authorised by the Secretary of State (in practice, this is delegated to a Home Office official).

There are a limited number of sleeping mattresses in the STHFs and the Board considers that it is inhumane to require people to sleep on the floor or on chairs. People are regularly detained for long periods, sometimes over 24 hours, in STHFs, which are designed to hold people for short periods. The Board considers that it is unacceptable to hold people in detention without adequate provision for rest or sleep.

The STHFs the Board monitors are not residential establishments and do not have adequate facilities for sleeping or exercise and do not offer any privacy. Other than Gatwick South, no airport holding rooms provide showers.

The Board is very disappointed that the Disability Access Review, which was recommended by the IMB and was carried out between April and August 2023, was only published to the Board in December 2024.

The Board is very concerned about the lack of privacy afforded to detained persons during the initial induction at some of the STHFs or while being examined by an Aeromed health professional.

The Board continues to be concerned about the length of time it takes to resolve problems associated with the maintenance and repair of airport facilities.

Health and wellbeing

The Board is pleased to note the continued availability of Aeromed at Gatwick, Luton and Stansted airports providing 24/7 cover.

Removal, transport or transfer

The Board has noted an improvement in the process of transferring persons to asylum accommodation. The problems can be caused by a combination of delays by the Home Office, transportation and accommodation availability. Delays have been noted specifically overnight and at weekends in the time taken for Clearsprings to be contacted and/or respond.

N.B: Clearsprings Readiness Homes is a government approved sub-contractor of accommodation and transfer for those who are bailed, having sought asylum.

3.3 Recommendations

TO THE MINISTER

- The Board is very disappointed that the Disability Access Review requested by the Board was not shared with the Board until some 16 months after completion. It is concerning that the newly built facility at 2 Ruskin Square, which could reasonably be expected to comply with all recent legislation, does not meet some of the standards highlighted in this review as noted in 5.1 and 5.3.
- The response that we received from the Minister in **September 2024** contained two commitments, which have still not been delivered on:
 - The Minister committed 'plans have been agreed with GAL to utilise existing space to install a shower room and additional toilets with works expected to begin in **September 2024**' at Gatwick North.
 - The Minister stated that works at Felixstowe were due to commence by the end of **Q2 2024**.
- The Board recommends that the Minister review the accommodation capacity, especially as noted in 4.3 and 5.1 at Luton and Stansted. There are an increasing number of people held overnight at the STHFs, which are not designed for overnight accommodation and, in some places, do not provide a dignified and humane space and where the only hot food available at Luton is instant noodles, which is unacceptable for those held more than 12 or 24 hours.

TO THE DIRECTOR/CENTRE MANAGER & TO HOME OFFICE IMMIGRATION ENFORCEMENT

The Board recommends that the Home Office review the capacity of each of the holding rooms.

- As noted in 5.1, the Board recommends that the capacity at Luton Airport STHF is reviewed urgently, due to the potential impact on the safety of detained persons and staff in the event of a fire. It is not unusual to have more than 20 detained persons in a 24-hour period at Luton Airport, which is the stated capacity.
- The Board recommends where floor space is sufficient, such as at Gatwick North and South main holding rooms, that the adequate provision of sleeping mattresses should be reviewed, as noted in 5.1.
- The Board recommends that action should be taken to reduce the number of detained persons staying in airport STHFs overnight and to reduce the number of detained persons held for longer than 24 hours, as noted in 5 and 5.1.
- As noted in 7.3, the Board recommends that the Home Office review the use of handcuffs at Luton Airport, when residents are moved through public areas, as the Board considers this non-compliant with STHF Rule 11 - Short-term Holding Facility Rules 2018 amended by Short-term Holding Facility (Amendment) Rules 2022.
- The Board notes the response of the Minister, in September 2024, that a dynamic risk assessment is conducted before handcuffs are used. The Board is concerned that these assessments may not be conducted at Luton, as all persons that the Board has observed are in handcuff restraints when escorted to a return flight, which would indicate that everyone is of the same risk.
- The Board recommends that the Home Office considers strengthening the relationship between Border Force and Children's Services. The Board notes there is no service level agreement between BF and Children's Services, resulting in some unaccompanied children waiting for 16 or 17 hours for support, as noted in 7.4.

3.4 Progress since the last report (Ministerial response, September 2024)

3.4.1 Airport accommodation

Although the Minister stated in the response to the Board's 2023-2024 annual report that a formal review of accommodation had taken place, the Board continues to be extremely concerned about the facilities at Luton, especially with the number being held overnight and the family room at Stansted, which is only accessible through the main room and is, therefore, not ideal for either families or vulnerable people, as noted in 5.1.

3.4.2 Holding room capacities

The Board is pleased to see the opening of the new facility at Purfleet and some reconfiguration at Stansted. But the facilities at Luton and Stansted need to be reviewed urgently, due to the number of people being detained to accommodate peak throughput. (See section 5.1)

3.4.3 Gatwick North accommodation

The Board is concerned that the Ministerial response, in September 2024, stated that plans were agreed with Gatwick Airport Limited and were expected to begin in September 2024. The Board has seen no progress to deliver the agreed works.

3.4.4 Felixstowe

The Ministerial response, dated September 2024, stated that works at Felixstowe were due to commence by the end of Q2 2024. This was clearly not correct when the Ministerial response was written, and the Board has still not seen a schedule of works to have this dilapidated facility replaced.

3.4.5 Disability access and support

The Board is disappointed that it took almost 16 months for the Home Office to publish the Disability Access Review, which was completed in August 2023 for the holding rooms that we monitor. There has been no indication when a rectification plan to address the issues highlighted will be published.

3.4.6 Stansted accommodation

The Board acknowledges that improvements have been made to the food preparation area. We continue to be very concerned about the accommodation and the impact on those detained (see 4.4 and 5.1).

Evidence sections 4 – 7

4. Safety

4.1 Arrival and induction

The Board has regularly monitored C&C officers carrying out inductions efficiently, following a common standard, including the use of translation services, such as, for example, The Big Word and translation tablets. The inductions are carried out sensitively, assessing risks and medical needs of the detained person. C&C officers encourage the detained person to share information regarding those risks or needs.

The Board has reviewed a sample of relevant documents at each location. Generally, they are completed properly.

There is a concern that health needs or other risks may not be identified if adequate translation services are not available. (see section 5.3)

The Board continues to be very concerned about the lack of privacy for inductions or medical interventions. During the induction process, personal searches and conversations are carried out in common areas or behind drawn curtains, with little or no privacy. These conversations can often lead to the disclosure of sensitive information (see section 5.1), which can be heard by other members of staff or, indeed, other detained persons, and this problem is worse when a speaker phone is used for The Big Word translation services.

The Board is very concerned about the lack of privacy across all the STHFs at the airports that the Board monitors while detained persons are being cared for by Aeromed. There are no discreet facilities for an Aeromed health professional to assess the medical needs of a detained person.

There have been relatively low numbers of people being detained over the reporting year at the shipping ports, and Border Force has exceptionally agreed, outside of the MoU, to inform the Board member on duty when someone is detained. This arrangement has worked well during the reporting period.

The Board has reviewed Version 19 of the Resident Induction and Property Form and is satisfied that the inductions appear to follow a process that enables C&C officers to highlight risks.

We have observed generally good working relationships between C&C and BF officers.

4.2 Vulnerable adults, safeguarding

BF and C&C officers have a responsibility to identify and assess the risks relating to vulnerable adults and young people, and particularly unaccompanied children who are detained.

It has been noted, specifically at Stansted and Luton, that the IS91 (the authority to detain) form does not always identify those with vulnerabilities or medical needs.

The Vulnerable Adult Warning Forms that members have reviewed are well documented, with clear observation notes, in many instances every 15 minutes. The

Board notes that the daily online logging now carried out clearly identifies vulnerable people and their vulnerability.

We are unaware of any vulnerable people being detained at Lunar House, 2 Ruskin Square, Southend, Tilbury, Purfleet, Harwich or Felixstowe over the reporting period.

4.3 Children and families

The current size and capacity of the holding rooms at Gatwick North, Luton and Stansted do not allow for multiple families, or a family and other vulnerable adults detained at the same time, to be cared for safely and decently, when these facilities are nearing capacity.

The only access to the family room at Stansted and the toilet facilities for those detained families is through the main holding room, which the Board considers inappropriate. Families have the same access to the toilet facilities as those held in the main holding room. It is not known if this layout presents a risk to children.

The Board has reviewed a sample of the Child Care Plans and noted that these are well documented and, where appropriate, the local authority Children's Services were notified. Monitoring at Stansted noted that where unaccompanied children were returning to their country of origin, further checks identified that the receiving social services were informed of the children's impending arrival.

Although the numbers are small, the percentage of unaccompanied children arriving through the seaports is significantly higher than through the airports. Board members have reviewed the documentation for these children and the timely involvement of Social Services and our monitoring indicated that the system was operating satisfactorily.

4.4 General safety

As is noted in section 5, the Board is very concerned about the lack of commitment to resolving outstanding issues relating to the fabric at each of the STHFs. It is unclear to the Board the extent to which C&C, BF and the Home Office can influence the port operator to resolve issues in a timely manner.

The Board has specifically observed a regular testing regime at Lunar House and 2 Ruskin Square for fire and panic alarms, which are well documented. The Board has reviewed the logs that show these tests have been completed at other facilities. The Board has been informed by the Home Office that there will not be a report published for the fire evacuation, which occurred on the 25 November 2024.

The Board notes that the improvements to the food preparation and luggage storage area at Stansted were completed satisfactorily this year. Hot and cold running water are now available in a kitchen area and lockers in a lockable room are made available.

5. Fair and humane treatment

The Home Office Short-Term Holding Facility Rules state that a '*Holding room*' is defined as being an STHF where a detained person may be detained for a period of not more than 24 hours, unless a longer period of detention is authorised by the Secretary of State (in practice, a Home Office official)'. The data shows clearly that people are often detained for more than 24 hours and, in some cases, for significantly longer.

At the airport STHFs that the Board monitors, only Gatwick South has showers. There are inadequate facilities to enable detained people to rest or sleep when detained for lengthy periods. There is no access to fresh air or any exercise area, making these facilities particularly unsuitable for children or vulnerable people.

The Board does not consider it is humane to detain people for long periods (over 24 hours or overnight) in these conditions. There has been a slight increase in those held for over 24 hours compared with the previous year. Almost 6% of those held at Gatwick South in February and May 2024 were held for more than 24 hours. Two people were held for more than two nights at Gatwick in September

Over 30% of those detained are held overnight every month, peaking at 47% at Gatwick South, 45% at Stansted and 36% at Luton.

During the period 2024-2025, 4865 people were detained at the major airports compared with 5488 in the period 2023-2024 and 5306 in the period 2022-2023.

A total of 264 people were detained for more than 24 hours in the reporting year, 176 of whom were in facilities with no showers. A total of 256 people were detained in facilities that are not residential facilities, which have no natural lighting, no privacy and no exercise space. Over 4000 people were detained overnight.

The Board regularly notes many people being detained overnight: for example, in January 2025, at least 53 people at Luton, 97 people at Gatwick South and 69 people at Stansted were detained overnight.

The operating capacity at Luton is 20 and the Board consistently observes more than 20 people per day being held at Luton, peaking at 30 people being held at some time during the day on 22 May 2024. This affects the care being given, as staff are constantly either performing inductions, preparing people to be transferred or escorting to return flights. The same level of activity is observed at Stansted.

5.1 Accommodation, clothing, food

There is limited privacy, particularly for induction, where newly detained persons are asked very personal questions, such as, for example, their gender orientation or whether they have suffered abuse. There is limited private space for Aeromed to provide medical support. Some improvements have taken place at Stansted, where more privacy is offered, but in the other locations these interviews occur behind a curtain, with no soundproofing. The Board considers the above to be a lack of respect to those detained.

The Board continues to be concerned about the sleeping arrangements at all locations, as there is very limited provision for people of different genders to have separate spaces in which to sleep.

The Board has remained concerned about the inadequate sizes of most of the holding rooms.

At Gatwick North, the Ministerial response in June 2023, and a more detailed response in September 2024, stated that *'plans have been agreed with GAL to utilise existing space to install a shower room and additional toilets with works expected to begin in September 2024, which will expand the existing footprint of the STHF'*. The Board remains concerned, as it has seen no plans to implement these agreed changes and families continue to be held in an inhumane space.

At Luton, the overall space provided for the holding room is far too small. When the main holding room is at capacity (10), there is only space for five people to lie on the floor to sleep. The Board has observed so many people trying to sleep on the floor that it has been very difficult to walk through the area. The Board questions whether this space meets health and safety requirements. Concerns about the cleanliness of the floors raises further concerns. Increased cleaning and maintenance have improved conditions following closure, due to health and safety concerns during the year. The STHF was closed for two days in October 2024, due to poor hygiene conditions and an insect infestation. There has been no hot food since the facility was reopened after the insect infestation.

Despite some refurbishment and extension in August 2024 at Stansted, the size and layout of the holding room is inadequate when the facility is at capacity, sometimes with additional detained persons having to be held elsewhere by BF. The very small family room within the main holding room has no separate access, provides little or no privacy and is barely adequate to hold a family of four. The Board does not consider it humane for families or vulnerable detained persons to have to gain access to the main holding room before they can use the toilet.

On several occasions the Board has reported water on the floors of the toilets at Stansted, likely caused by residents trying to wash in the small washbasins as there are no showering facilities.

C&C staff at Stansted have commented that single women can find it very intimidating if the family space is full, as the main holding room is very small and some detainees can be very loud, which can be perceived as threatening.

It is disappointing to note that the newly built facility at 2 Ruskin Square does not meet the standards identified in the Disability Access Review, which was carried out between April and August 2023 and which was recently been released to the IMB.

At 2 Ruskin Square, the two holding rooms are adjacent, with only a clear glass wall separating them. Within weeks of the facility being opened, the Board has been told of women feeling intimidated, as men have been gesticulating at them through this clear glass wall.

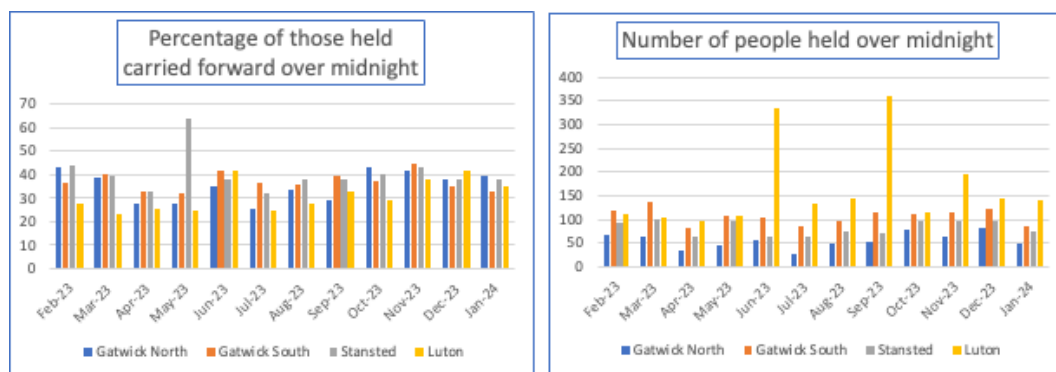
The Board remains concerned about the poor portacabin facility at Felixstowe, which is not fit for purpose. It is in a very poor state of repair externally and is intimidating as a place to be taken to for interview. The structure is in a dirty and dilapidated condition, with no disability access. There is a chemical toilet located outside the portacabin, but there are no shower facilities or running hot water. Internally, the portacabin is clean but is very small and cramped and the Board feels strongly that the holding facility should be replaced as soon as possible. BF have made the Board

aware that detention at Felixstowe is minimised, with detainees being transferred to Harwich. The Board feel that it is degrading for detained persons to have to ask to go to the toilet, which is a portable chemical toilet adjacent to the secure facility.

Although the Board recognises there is a safety concern, with having too many sleeping people on the floor, there is equal concern about the decency for those detained overnight who are unable to sleep due to the overcrowded accommodation. The Board does not consider it humane to ask people to sleep in a fixed chair with their head on a table or to lie on the floor with a mat and blanket.

The data shared with us show that individuals are being held for periods more than 24 hours on a regular basis each month, in conditions where it is almost impossible to sleep. At Luton this year, over 256 people have been held overnight and 19 people held on the 17 July 2024. In November 2024, seven detainees were held for more than 24 hours in Gatwick North and 10 in Gatwick South.

The STHFs are not residential facilities, but each month people are detained for more than 12 hours (for example, 957 people at Luton; 354 at Gatwick North; and 776 at Gatwick South in 2024).



The Board continues to see problems in resolving problems with the maintenance and/or repair of the STHFs, which reside with the airport or port owner. The Board has regularly highlighted this in monitoring reports, which are shared with the Home Office and C&C.

The table below gives examples of issues we have highlighted and that have an impact on detained people.

Location	Problem	Date	Status
2 Ruskin Square	<p>Snagging issues.</p> <p>E.g. TV not working in either holding room.</p> <p>Air conditioning system, rendering the holding rooms very cold.</p>	November 2024	Ongoing

Stansted	Lack of CCTV in the luggage storeroom. State of repair of the chairs. Ongoing maintenance issues: lighting, smoke alarms and toilets.	Early October 2024 February 2024	Ongoing
Gatwick North	BT pay phone unable to make outgoing calls. In November 2024, it was decided that this would not be resolved.	October 2023	Unresolved
Luton	Phone in female holding room often not working.	January 2025	Unresolved
Luton	The STHF was closed for two days due to poor hygiene conditions and insect infestation.	31 October 2024	Deep clean on 2 November 2024
Stansted	Ongoing maintenance issues: lighting, smoke alarms, toilets.	2024	Unresolved

In June 2023, it was decided that Border Force Officers were not able to serve hot food or drinks to detained individuals, as the STHFs they managed did not comply with UK food safety requirements. This remains unresolved at the end of the Board's reporting year, in January 2025, and detained people were still only being offered cold food in some locations and, in one location, cold drinks. The availability of food, particularly hot and fresh food, is often limited. Staff report low levels of food supply, which is particularly troubling at Gatwick.

There has been no hot food, except instant noodles, available at Luton since May 2024, which the Board is concerned about, especially for those people detained for long periods.

5.2 Relationships between staff and detained people

The Board continues to be impressed by the care and sensitivity shown by C&C officers to those in their care in what can be both emotionally and physically challenging circumstances. When questioned, detained people generally indicate their satisfaction with their treatment by C&C officers. Staff are from a mixture of cultural backgrounds and previous employment experiences. Some speak different languages, which makes communication with detained people easier and often more productive.

C&C officers have been observed working with those in their care with tact and sensitivity.

The Board is pleased to note that recent C&C recruitment has resulted in staffing numbers at C&C-managed STHFs increasing. There are still occasions where only one member of staff has been overseeing the STHF, whilst others are performing

other duties. The Board continues to believe there is a risk that this could impact on the care that C&C Officers provide.

Aeromed offer a prompt and professional 24/7 service and work well with colleagues from BF and C&C at the airports. During our visits, we have found that C&C officers are generally open to our questions, are candid in their responses and will volunteer information should they have concerns relating to those in their care.

The Board is aware of six formal written complaints that have been received by C&C during the reporting period, which is an increase on the previous year, when there was one formal complaint. All were investigated and none was fully upheld, although some were partially upheld. Complaint forms are available in each of the holding rooms and during the induction process we have observed that officers usually explain the complaints procedure.

Occasionally, low staffing levels are reported, usually at night. This restricts the time staff have to make sure detained people are treated fairly and humanely.

At Stansted, we observed staff to have positive relations with detained persons and observed one detained person leaving the holding room for a flight (escorted by UKBF). During his departure, he was heard to thank the holding room staff profusely for their help and to comment on the positive treatment that he had received. In response, a member of holding room staff said that they were called 'Care and Custody', and that 'Care always came first'.

5.3 Equality and diversity

For those detained individuals with limited mobility or who have sight or hearing loss or other physical limitations, other than at Gatwick's South Terminal, no specific provision has been made at any of the airport holding rooms. Our monitoring suggests that unless such limitations are declared by the individual or are obvious, they may not always be recognised. We are also concerned that the mental health of detained individuals, in what can be a challenging environment, may not always be adequately assessed.

In 2023, disability access reviews of short-term holding facilities were carried out following the IMB recommendation *'that a full disability access review to ensure that there is proper access and facilities for all detainees with disabilities be undertaken at all establishments'*. The delayed Disability Access Review raises numerous concerns about the STHFs ability to accommodate people with disabilities. The findings, published in late 2024, showed the STHFs to be largely non-compliant with legislation and included common issues around wheelchair access and provision for sensory impairments e.g. hearing loops and equipment for the visually impaired. Not all facilities had accessible toilet facilities. It is noted with some disappointment that the facilities at 2 Ruskin Square, a new building, do not meet some of the requirements highlighted in the Disability Access Review.

As a priority, BF need to publish a plan to address the concerns raised in the Disability Access Review.

The Board has observed that, at each of these facilities, C&C provide a culturally diverse range of food and drinks and make reasonable efforts to provide appropriate information in a wide range of languages.

Using the phone translation service, The Big Word, or technology such as a tablet loaded with a translation app, most language needs are catered for.

5.4 Children, families

The family holding rooms at Gatwick North, Luton and Stansted are particularly small and cramped. There is effectively no room to sleep at the Gatwick North family room and the family room at Stansted is often used by non-family members.

Although the family room at Stansted has been refurbished and now has soft seating and colourful murals on the walls, the Board considers it still to be unsuitable, as it has very limited capacity, does not have separate access, offers little privacy and does not have its own toilets.

The space available for families, single women and vulnerable people continues to be inadequate when there is more than one in resident at the same time.

The Board's view is that a separate, secure family room, which should generally be reserved for the use of families, single females, and vulnerable individuals, should be provided as soon as possible at all locations.

There has been a limited need for family space or support at the sea port STHFs that the Board monitor, although the Board notes the provision of space at Harwich.

Our examination of BF records has indicated that 724 children were detained during the period covered by this report, 85 of whom were unaccompanied minors.

5.5 Faith and religious affairs

A variety of religious texts, including the Bible, the Quran and the Torah, are available at each STHF. The Board notes that religious books are neatly displayed and, where necessary, separated from those of other religions.

A small selection of halal and kosher ready meals is generally available at the airports, and we have seen evidence of C&C officers visiting the local supermarket to provide other food when required. C&C officers are aware of the dates and requirements of various religious festivals and appropriate catering needs.

5.6 Property

The property of detained persons is held by C&C for the duration of their stay in the STHF and is checked and security tagged, although the level of security at each of the holding rooms varies. Mobile phones and prescribed medication are removed from the detained person as part of the induction process and kept in their checked property.

Property should be always kept in a secure area and be kept locked. During the year, Board members observed times when these areas have not always been properly secured.

6. Health and wellbeing

6.1 Healthcare

The Board is pleased to note that a 24/7 service, provided by Aeromed, has continued to be made available during the reporting year at Gatwick, Luton and Stansted.

Board members' interaction with Aeromed staff has always been positive and the Board has observed Aeromed health professionals dealing with medical needs in a caring and compassionate manner.

The Board is concerned that records of a person requiring regular medication (e.g. for diabetes) may not be sufficiently highlighted to alert all staff to follow a timetable for those needs.

There was no Aeromed cover at Lunar House. In our view, the C&C officers at 2 Ruskin Square should have access to the advice of healthcare professionals.

At Southend Airport and the shipping ports, various arrangements are in place to provide medical support, including the use of first aid trained fire fighters at Southend Airport, to the use of the 111 and 999 service in the event of an emergency at other holding facilities.

6.2 Physical and mental healthcare

The Board is concerned about the lack of privacy where medical consultations can be overheard when talking with detained persons. This concern is heightened when the consultations take place behind a drawn curtain, where conversations can be overheard by other staff members or detainees.

Concerns have been raised about the cleanliness and lack of sanitary conditions in the areas used for medical care in the STHF at Luton.

Detained persons at the Airport STHF's and most of the Port STHFs have no access to fresh air or an exercise area and this is of particular concern when people are held for a long time. Data shared with the Board shows that people are increasingly being held for longer periods and we recommend that the Home Office should address this issue.

Where people are identified as vulnerable because of physical or mental health conditions, C&C officers are required to prepare a written care plan and our observations suggest that these are appropriately detailed.

We are concerned that with the increasing numbers of people being detained, it is not always possible for C&C officers to be aware of those with mental health conditions who have not self-identified, and we believe this may be a potential safety issue.

7. Preparation for removal, transfer or release

7.1 Case management

The Board continues to be concerned about the number of people detained for longer than 24 hours in the care of C&C. The following charts show the number of people detained for greater than 12 and 24 hours.



The total time a person is in detention can increase significantly when the time a person is held by BF is added to the time the person spends with C&C.

We do not consider it to be dignified or humane to detain people for more than 24 hours in a short-term holding facility. The STHFs that the Board monitor do not provide access to time in the open air or exercise space. These facilities do not have provision for adequate sleeping areas. Only Gatwick South and Southend provide showering facilities.

The Board is particularly concerned where children and vulnerable adults are held in detention for lengthy periods. The Board notes the concerns that have been raised regarding the response of Children's Services in this regard (see section 7.4).

7.2 Family contact

C&C officers will allow detained persons to make calls to families and friends by phone as part of the induction. Once they have moved to the holding room, this is more difficult to accommodate.

Although coin-operated payphones are available in some holding rooms, they are not always operating correctly. These are generally only available for incoming calls, with officers encouraging detained persons to share the phone number for the payphone during their 'induction call'. There is generally only one payphone to share among all detained persons and the logistics of using this can be puzzling, especially for those who do not speak English.

The Board continues to note issues reported by staff and detained persons concerning access to personal mobile phones. This has included detained persons becoming agitated when they are unable to contact loved ones to update them on their situation. Whilst the Board understands the security implications surrounding

this, we believe that the situation is unsustainable and that alternative solutions must be found, especially as the majority of calls today are made via some form of internet service.

The Board was pleased that a rollout of wi-fi technology was being proposed in holding facilities on a trial basis, but regrets that this now appears to have been suspended indefinitely. The Board considers that this issue is being given insufficient attention, given that detained persons are being detained for lengthy periods without being able to make suitable contact with their families. The Board also considers that this has an impact on detained persons being able to make onward arrangements, whether this be on their release or on their return to another country.

7.3 Removal

The Board has regularly observed the escort of detained persons to aircraft. These escort duties are normally carried out by C&C. However UKBF also conduct escorts where this is required. We have noted that officers have carried out these escort duties with discretion and that, often in quite difficult circumstances, they treat those in their care with sympathy and kindness.

The Board continues to observe good working relationships between UKBF and C&C staff at ports. C&C staff have been observed to assist in explaining removal decisions to detained persons.

The Board continues to be concerned with the length of journeys that detained persons experience when they are being removed from the UK. The Board often sees detained persons within its ports who have been held for several days, being moved by road from facility to facility.

The Board remains concerned regarding the routine use of handcuffing at Luton Airport. The Board notes that detained persons are routinely handcuffed when being escorted to flights at Luton. This is unique and not the case at other ports monitored by the Board and it is not compliant with the STHF Rule 11 – Short-term Holding Facility Rules 2018 amended by the Short-term Holding Facility (Amendment) Rules 2022. The Board has been informed that this is because the airport authorities have expressed a preference for detained persons to be transported in handcuffs. However, the Board does not consider that should have any bearing on the decision to use force on detainees or whether the appropriate dynamic risk assessment for each individual has been carried out. The Board believes that it is neither humane nor appropriate to handcuff persons where this is not required.

7.4 Transfer or release

The Board has observed, from reviewing the daily logs, some lengthy waiting times, in some instances between 16 and 17 Hours for Children's Services to respond to requests to attend STHFs at ports and airports to provide support for unaccompanied minors. At Luton, delays can occur while Children's Services staff are granted airside access.

The Board notes that detained persons (particularly females) are regularly transferred from Lunar House or 2 Ruskin Square to the Manchester area, leaving in the evening and not arriving until after midnight.

8. The work of the IMB

Board statistics

The chart shows the total contacts (the figure in brackets shows where the contact was by phone).

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	13
Number of Board members at the end of the reporting period	11
Total number of Board meetings	12
Total number of visits to Gatwick Airport North. STHF	40 (2)
Total number of visits to Gatwick Airport South STHF	44 (2)
Total number of visits to Luton Airport STHF	57 (2)
Total number of visits to Southend Airport	10 (8)
Total number of visits to Stansted Airport STHF	52 (0)
Total number of visits to Port of Felixstowe	18 (12)
Total number of visits to Harwich Port	12
Total number of visits to Tilbury Port	8 (6)
Total number of visits to Purfleet Port	1
Total number of visits to Lunar House Immigration Reporting Centre STHF	36 (18)
Total number of visits to 2 Ruskin Square Immigration Reporting Centre STHF	9 (2)



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