



# Annual Report of the Independent Monitoring Board Charter Flight Monitoring Team

**For reporting year  
1 January 2025 to 31 December 2025**

**Published May 2026**



# Contents

<b>Introductory sections 1 – 3</b>		<b>Page</b>
1.	The role of the Independent Monitoring Board Charter Flight Monitoring Team	3
2.	Background to the report	4
3.	Key points	5
<b>Evidence sections 4 – 7</b>		
4.	Safety	8
5.	Fair and humane treatment	11
6.	Health and wellbeing	18
7.	Preparation for return and re-integration support	20
8.	The work of the CFMT	22
<b>Annex A</b>		
	Use of force case studies	23
<b>Annex B</b>		
	Minister's action plan in response to the previous report	25

All IMB annual reports are published on [www.imb.org.uk](http://www.imb.org.uk)

## **Introductory sections 1 – 3**

### **1. The role of the Charter Flight Monitoring Team**

The Charter Flight Monitoring Team (CFMT) was created on an administrative, non-statutory basis by agreement between Home Office Immigration Enforcement (HOIE) and the Independent Monitoring Board (IMB) Management Board. The role of the CFMT is to monitor and report on the conditions for, and treatment of, people detained under immigration powers who are removed from the UK on charter flights. Its remit begins when the individual is transferred to the custody of overseas escorts and ends at the point of handover to local officials at the receiving destination. It is best practice that the CFMT also attends the briefing to overseas escorts when they muster (the process of gathering, assembling or accounting for all passengers or crew before a flight) before an operation.

To enable the CFMT to carry out our role effectively, we should be afforded the same assistance as IMBs appointed on a statutory basis, with regard to monitoring rights.

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, detained individuals and to make recommendations for the prevention of ill-treatment. The IMB is part of the United Kingdom's National Preventive Mechanism.

## **2. Background to the report**

In the 2025, the CFMT monitored operations to Albania in February, April (twice) and July, with a joint Albania/France flight in October. An operation to Romania was monitored in November, to Vietnam in June, to India in September and to Pakistan in May, with a further joint Pakistan/Bangladesh operation in August. Two flights to France under the Home Office 'One in, one out' scheme were monitored in October and December.

Those subject to removal were either individuals transferred from a prison to the immigration detention estate prior to removal, or others who had failed in their application for asylum. We calculate that just under 60% of removals were enforced.

Home Office Immigration Enforcement (HOIE) monitors also achieved contemporaneous oversight of stages of the removal process on the day. An HOIE contract monitor attended a staff briefing, a collection from an immigration removal centre (IRC), sometimes from two, and flew on all the flights we observed. There was often a Home Office use of force (UoF) monitor, too.

The aircraft were chartered by HOIE. Mitie Care and Custody Limited (C&C) remained HOIE's escort contractor. Healthcare services were, again, provided by IPRS Aeromed (Aeromed), contracted by C&C. C&C also contracted the coach company, whose vehicles were used to take returned individuals from IRCs to the airports.

### **3. Key points**

#### **3.1 Main findings**

##### **Safety**

- For the last two years, the CFMT's reports have highlighted HOIE's removal of people with known vulnerabilities. This has continued, with little progress in the adoption of a trauma-informed approach to the management of their individual needs. This is of particular concern when use of force (UoF) is applied.
- The CFMT observed 28 instances of UoF and noted concerns around inadequate de-escalation, a lack of preparation prior to restraint being applied (potentially endangering both returnee and staff) and, at times, inconsistent and contradictory paperwork.

##### **Fair and humane treatment**

- Once again, as in previous years, we report that some returnees have spent excessive time on board coaches or 'chase' vehicles (vans designed to accommodate a single returnee with accompanying escorts), waiting for long periods at IRCs before departure or on arrival at the airport.
- From our observations, the standard of the coaches provided was sometimes poor and resulted on one occasion in returnees having to be transferred to another coach while on route to the departure airport. There were issues with the heating systems and the lavatories. Some of our reports also noted that coach drivers were sometimes observed to drive erratically and/or to be tired.
- Relationships between staff and returnees were generally observed to be very positive, with escorts remaining focused on trying to engage with the returnee in their charge, despite the long journey times. The empathetic way some coach commanders (CCs) approached the meet-and-greet process did much to reduce stress and is to be commended.
- Significant concerns were raised throughout the reporting year about inadequate interpretation, which meant many returnees did not understand what was being asked of them or what was happening.
- Late night/early morning collections of returnees from IRCs meant long hours awake for people being returned.
- As in previous years, the use of single-aisle aircraft at times impeded the CFMT's ability to properly monitor the welfare of returnees.

##### **Health and wellbeing**

- As a result of the IMB Staff - on behalf of the CFMT - seeking legal advice on the process of removing returnees from secure mental health facilities, a new instruction was issued by the Home Office in mid-2025. It ensures that all relevant removal documents must now be served by trained immigration enforcement officers from regional immigration compliance and enforcement (ICE) teams. See section 6.1.1
- The numerous documents for each charter flight and returnee do not always make the potential vulnerabilities of individuals clear, raising concerns that escorts may not be aware that those they are looking after may have specific medical or mental health needs. These documents have been found, on

occasion, to be out-of-date, with pages containing specific alerts routinely not completed and with dense and hard-to-access information.

### **Preparation for return**

- It is not within the remit of the CFMT to comment on the level of preparation provided to returnees prior to their arrival at the point of collection. On occasion, they are wearing inadequate clothing, although this is usually resolved through the IRC's provision of suitable garments.
- Returnees are offered access to the chief immigration officer (CIO) on the plane as part of the 'meet-and-greet' process. This does not always happen, especially on short-haul flights, due to the length of the journey, and the use of single-aisle aircraft, which impedes movement around the plane.

### **3.2 Main areas for development**

#### ***TO THE MINISTER***

- A significant proportion of individuals subjected to enforced removals are recognised as highly vulnerable, either through assessment as an adult at risk (AAR) or through identified risks of self-harm or suicide documented in an assessment, care in detention and teamwork (ACDT) plan. The CMFT has seen little evidence of trauma-informed practice in the treatment of these individuals. What further action will the Minister take to ensure that vulnerable people subjected to enforced return receive adequate, appropriate and trauma-informed support throughout the process? See 4.3.2 and 4.4.5.

#### ***TO HOME OFFICE IMMIGRATION ENFORCEMENT (HOIE)***

- From the Board's observations, the application of UoF is frequently poorly planned and executed (see 4.4.3), resulting in additional distress for the returnee and the potential for injury to both them and the escorts. The issue does not lie with the techniques themselves, but with their inconsistent and, on occasion, inadequate application. What measures are in place to ensure that the escorting contractor consistently applies correct techniques?
- The CFMT has reported, over the course of the year, that some interpreters appear to have been inadequately briefed and are confused about their role and the level of support to be offered. They also seem to be unclear about flights times, return arrangements and the nationalities (and, therefore, native languages) of those to be collected. The interpreters' briefing document, which was produced towards the end of the reporting year, is welcomed. However, when will the HOIE provide essential documentation, similar to that routinely given to the CFMT on arrival at the muster, to ensure they have the information to carry out their responsibilities effectively? See 4.1.
- As noted in previous reports, we maintain that holding returnees in vehicles for such extended periods is neither fair nor humane. In our 2024 annual report, we raised the possibility of returnees and escorts waiting in the IRC once processed, but our suggestion was rejected. We ask that this decision is revisited on a case-by-case basis with each IRC.

## **TO HOIE AND TO THE ESCORTING CONTRACTOR**

- During collections, some CCs ask returnees if they are happy to return to the destination country (see 4.2). However, a negative response can be the sole trigger for the application of a waist restraint belt (WRB), even if the returnee shows no signs of non-compliance and/or on occasion may not have fully understood the question. Can a more nuanced evaluation of compliance be developed, to reduce the risk of unnecessary UoF intervention at this early stage?
- As in previous years, our reports regularly raise the issue of unacceptably long periods spent aboard a coach or chase vehicle between the collection point at an IRC and boarding the aircraft. No action appears to have been taken during 2025, which could include the activation of waiting areas at the IRC and/or staggered collection times when more than one coach is used at an IRC. What will be done to address as a matter of urgency? See 5.4.1-5.4.3.
- With the decreased availability of interpreters, the unreliability of The Big Word translation service and the range of nationalities (and, therefore, languages) on some flights, Mitie C&C staff are increasingly being used to translate. Consideration should be given to offering specialised training and support for escorts who are willing to undertake this role, so that it becomes a formalised part of their duties rather than an unregulated task operating 'under the radar'. See 5.8.7.

## **TO THE ESCORTING CONTRACTOR**

- The quality of the personal escort records (PERs) we sampled over the year was very variable, both in terms of content and legibility. When will more be done to ensure escorts are making PER entries of an acceptable standard and that regular training and support is offered? See 5.7.2.
- Will measures be taken to ensure that the CFMT receives the movement orders of returnees as part of the pre-flight information at muster - rather than solely on the coach - so that we can properly identify and monitor the most vulnerable returnees?

**3.3 Please see Annex B for the Minister's action plan in response to the previous report. *The Board has reiterated several issues raised in our previous report, as there has been little or no progress to date.***

## **Evidence sections 4 – 6**

### **4. Safety**

#### **4.1 Escorts' briefings**

4.1.1 Escorts are briefed at muster for each operation by the senior security officer (SSO) in charge, using a checklist to ensure that key matters relating to returnees are addressed. These principally include confirming the availability of individual risk assessments for each person and emphasising the requirement to complete PERs comprehensively. They also involve ensuring that dialogue and engagement with key personnel are properly documented, including when the security (IC Sec) addresses the UoF. Escorts should be reminded of their responsibility to ensure that any UoF is justified and recorded accurately, and that the release of any restraint may be authorised only by the escorts' security team leader. In addition, escorts are reminded of the information they are required to provide to returnees, including details about the use of body-worn video cameras (BWVCs) at various stages of the operation and the availability of the CIO to answer queries about immigration status and payments.

4.1.2 During the muster briefings we observed, these points were consistently covered, with tailored instructions provided for specific flights and emerging issues highlighted based on learning from recent operations.

#### **4.2 Induction by the escorts at the collection sites**

4.2.1 Inductions, or 'meet and greets', take place immediately on the transfer of returnees to escort custody at the IRC. Each induction is conducted individually by the CC, using a checklist to ensure that all key procedures are followed. A paramedic is present, and an interpreter (either in person or via The Big Word) is provided. However, it should be noted that The Big Word service is not always accessible, which can create difficulties when no in-person interpreter is available. From our observations, the induction process is generally brief and competently delivered. See Section 5.8.

4.2.2 During the induction, the CC introduces themselves, addresses the returnee by name and assesses their level of understanding, offering the use of an interpreter if required. Those being returned are informed of the day's arrangements. The CC sometimes asks them whether they are willing to return to the destination country. This question is used as a means of gauging likely compliance, and a negative response sometimes results in the pre-emptive application of a WRB. However, from the CFMT's perspective, a negative response is a statement of fact and not necessarily an indication of likely resistance or non-compliance and some CCs should understand the difference. Application of a WRB can unnecessarily escalate situations at an early stage. In our view, more appropriate and reliable methods for assessing the risk of non-compliance are therefore required.

4.2.3 Returnees' reactions vary. Those returning voluntarily nearly always demonstrate willingness to proceed, while those subject to enforced removal may appear visibly distressed, raise ongoing legal challenges or express concerns regarding money or missing personal property.

4.2.4 During inductions, people being returned are informed of the operational procedures they will encounter. This includes filming and the use of BWCVs, access to the CIO during the flight, and the availability of mobile phones and refreshments.

4.2.5 Returnees collected are required to undergo a pat-down search, which is conducted in private. People are also required to check and sign for their personal belongings and are provided with an information pack before boarding the coach to the airport.

4.2.6 Each returnee travels with a PER, which is used to document interactions and events throughout the journey, beginning with the induction. Our sampling of PERs (personal escort records) indicates that entries are not always made contemporaneously and that significant events and interactions are not consistently recorded.

4.2.7 While information conveyed at the 'meet and greet' is intended to be reinforced by the escorts during transport to the airport, this does not appear to occur consistently.

### **4.3 Returnees with specific vulnerabilities**

4.3.1 Of the 12 removal flights the CFMT monitored, 98 individuals removed during the period were categorised as adults at risk (AAR). A total of 20 returnees were identified as being at risk of suicide or self-harm and were subsequently removed under ACDT arrangements. Of these, seven were removed on the India flight on 23 September. In addition, five individuals were managed under a vulnerable adult care plan (VACP).

4.3.2 Despite the presence of highly vulnerable individuals, including those subject to ACDT arrangements, we saw little evidence that removal planning is meaningfully adapted to reflect their needs. While such individuals are formally recognised under the AAR framework and may be classified as complex removals, this recognition does not seem to be translated into practice. In particular, we found no evidence that a trauma-informed removal protocol is being applied.

4.3.3 Positive staff and returnee relationships are integral to effective risk reduction. The CFMT observed instances of careful and sensitive management of returnees subject to ACDT arrangements, which likely prevented the application of WRBs. However, these examples appear to reflect the professionalism and judgement of individual escorts and CCs rather than a consistent, system-wide trauma informed approach.

4.3.4 Although risk assessments are shared with escorting staff, their impact is limited where the information does not meaningfully inform how returnees should be managed in practice. There is little evidence that ACDT processes are being used consistently or effectively to guide safeguarding or support interventions. From our observations, completion of live ACDT documentation is variable and, in some cases, appears perfunctory, offering little assurance of meaningful observation, engagement or risk management.

### **4.4 Use of restraint and of force**

4.4.1 There were 28 use of force (UoF) incidents on the 12 charters monitored by the CFMT, five of which involved returnees who were subject to live ACDT

processes (meaning they were actively being monitored and supported due to identified risks of self-harm or suicide). We observed some violent and extreme attempts to resist deportation, during which significant force was required to restrain people to ensure their safety and that of others, and to carry out removal orders. While such incidents can be distressing for all involved, the CFMT did not observe any unnecessary or disproportionate UoF once a restraint was applied.

4.4.2 The CFMT observed effective de-escalation practices at various stages of the removal process. These were particularly effective when used during the 'meet and greet' phase, where clear communication and early recognition of agitation prevented escalation and, in some cases, avoided the need for a WRB. However, please see section 4.2.2 for our concerns regarding the way that some CCs employed use of force too rapidly.

4.4.3 In our view, UoF could be carried out in a more coordinated way. The application of WRBs and other restraint techniques at times appeared to be inexpertly handled, which increased the risk of injury to both the returnee and the escort. Observations included WRBs not being prepared properly before being applied, an escort attempting to secure one while wearing thick anti-bite gloves and escorts lacking experience in application, plus several incidents in which no one appeared to be in overall charge, leading to a lack of direction in the escort team.

4.4.4 Documentation also appeared to be inconsistent, with entries in the UoF reports varying in quality, accuracy and level of detail.

4.4.5 Individuals subject to ACDT processes frequently respond poorly to the UoF, often becoming highly distressed and disruptive during escort and flight stages. Current removal planning appears to rely predominantly on compliance and restraint-based approaches, rather than strategies designed to minimise distress, prevent escalation or reduce the risk of re-traumatisation. This reflects systemic planning gaps rather than individual conduct. There is no evidence that trauma-informed techniques are being applied during enforced removal operations, including in cases involving individuals with acute mental health vulnerabilities.

4.4.6 Notwithstanding these concerns, medics recorded no injuries following UoF during the period.

4.4.7 The usual escorts-to-returnees ratio is 1.5:1 but this was increased to 2:1 for flights conducted under Operation Hillmore, the UK-France agreement that underpins return flights to France.

## **5. Fair and humane treatment**

### **5.1 Night operations**

5.1.1 Of the 12 charter flights the CFMT monitored this year, eight departed from airports in the southeast and four from Midlands-based airports.

Most returnees on flights we monitored were collected from IRCs around Heathrow or Gatwick and in the Midlands. On five of the flights, returnees were additionally collected from an RSTHF in Lincolnshire. Decisions regarding the choice of airport and location of those being returned rests with HOIE.

The charter flights to Albania, France, Romania and Poland were scheduled to depart at 7.45am and, in one, case at 10am. These departure times necessitate the collection of returnees throughout the night. Collections typically commenced around 11pm and ended around 5am. The long-haul flights are generally scheduled to depart around 10pm, allowing for daytime collections.

### **5.2 Transfer of custody to the overseas escorts**

5.2.1 Usually, but not always, an advance party (AP) arrives at the IRC an hour or so before the arrival of coaches carrying most of the escorts, the interpreter and any observers/monitors. The AP comprises, at a minimum, the CC and the administration officer(s) (AOs). The AP works with IRC staff to ensure the property and paperwork for returnees is ready for their collections. The CCs are briefed by centre staff, and any potentially challenging individuals are identified. From our observations, the work of the AP is helpful in ensuring the collection process runs smoothly. Collections we have observed without an AP have tended to be more problematic and take longer.

5.2.2 The induction process conducted by the CC is recorded in section 4.2.

5.2.3 All returnees are searched before boarding the coach or chase vehicle (a van designed to accommodate a single returnee with accompanying escorts). This is usually conducted in a separate room, away from the collection area. People are searched using a hand-held detector and are then given a thorough rub-down search. Jackets and shoes are removed and checked separately. The search is usually done by the escort who will accompany the returnee to the airport, with two or three members of the C&C search team present. An interpreter is sometimes present. On one occasion we observed, the search being carried out in the collection area afforded little or no privacy to the woman being searched. The CC gives people the opportunity to use the toilet prior to boarding the coach. On the flights we have monitored, the offer is usually declined. However, on the occasions when it has been accepted, we have noted that no search is performed afterwards, which could present a security risk. Overall, the search process is performed efficiently, and we have not witnessed any issues.

5.2.4 Property belonging to returnees is bagged up and signed for before being loaded onto the coach. Any valuables, including coins, are checked by the returnee, signed for and placed in the property bag. Paper money is given to the returnee for safekeeping. Returnees are advised that passports and other ID (identification) may be held by the CIO and will be handed over prior to disembarkation from the plane. On occasion, those being returned complain that some of their property is missing and we have observed centre staff trying to locate this. One time, a person being collected complained that a mobile phone had been sent to the centre and its

delivery confirmed but that centre staff claimed no knowledge of a package being received. Centre staff did another check while the collection was taking place and found the package, which was put in the returnee's property bag.

If missing property is not found, the returnee is advised to submit a complaint form.

5.2.5 We have noted in our reports that, on occasion, an excessive number of personnel are present during some collections in the IRCs, which can appear intimidating for returnees. When observing daytime collections for long-haul flights, there can be numerous IRC staff present who often seem to be performing no function other than watching the proceedings. For nighttime collections where two coaches are used, it is best practice for the C&C personnel involved with the second coach to stay out of the collection area until required.

### **5.3 The length of in-vehicle confinement to which some returnees were subjected**

5.3.1 As recorded in previous annual reports and in detail in our operational monitoring reports produced after each operation, returnees continue to be held in coaches or chase vehicles for excessive periods of time. Below are some worst-case examples, noting the time between boarding the vehicle and boarding the plane and showing the time on the road:

- A returnee held at Colnbrook (CB) for the Pakistan/Bangladesh charter spent 8 hours, 15 minutes on the coach for a journey time of 3 hours, 35 minutes.
- A returnee held at Yarl's Wood (YW), also for the Pakistan/Bangladesh charter, spent 7 hours, 20 minutes on the coach for a journey time of 1 hour, 25 minutes.
- Another returnee, held at YW for a Romanian charter, spent 6 hours, 8 minutes on the coach for a journey time of 2 hours, 24 minutes.

5.3.2 As noted in previous reports, we maintain that holding returnees in vehicles for such extended periods is neither fair nor humane. In our 2024 annual report, we raised the possibility of returnees and escorts waiting in the IRC once processed, but our suggestion was rejected. We ask that this decision is revisited on a case-by-case basis with each IRC. We note that the collection area at Harmondsworth (HW) IRC has undergone refurbishment and appears to have the space to facilitate this.

5.3.3 There is limited space for coaches and chase vehicles at some IRCs so, if several vehicles are used, this may result in a coach with returnees and their escorts sitting outside the confines of the IRC whilst another vehicle is loaded. There would appear to be scope for staggering the collection times where two or more vehicles are involved to reduce the time spent waiting in vehicles.

5.3.4 The longest road journey the CFMT recorded this year was four hours, from an IRC in the southeast to an airport in the Midlands, with most taking between one-and-a-half hours and three hours, compared with up to five hours in previous years. The more predictable, and shorter, time on the road would suggest that there may be scope to push back collection times but, from our experience during the reporting year, this has not happened. The CFMT did not monitor any flights this year that left from airports in the northwest or southwest of England, but we assume that there would be longer journey times to those airports.

5.3.5 As highlighted in 5.4.4, despite the shorter journeys to the departure airport, some coaches still arrive very early for the flight and are held landside for considerable periods before boarding commences. This, again, suggests there is scope to delay collection times at the IRCs to reduce the amount of time returnees spend in vehicles.

## **5.4 Forms of transport and amenities**

5.4.1 Coaches are used to transport most returnees from IRCs to departure airports. Throughout the year in review, we have reported a variety of concerns, including erratic driving and drivers appearing to be tired, as well as several instances of coaches being too hot and the air-conditioning not working. On one occasion, the escape hatch in the ceiling of the coach had to be opened to allow some air in. On another, returnees were cross-decked to another vehicle on the journey to the departure airport due to lack of air-conditioning. Over the 12 operations monitored, there were various issues with the on-board toilets, including no running water and bad smells emanating from them. We also witnessed a disagreement between the driver and the CC regarding inside lighting. The CFMT hopes the phased introduction of new coaches, started in late 2025, will resolve some of these issues.

5.4.2 Chase vehicles (usually vans) are used to transport returnees who have indicated they do not wish to be deported or where restraint has been necessary. These vehicles have no toilet, which can be an issue particularly where the returnee has been held in the vehicle for an extended period of time. There have been instances of the occupant being cross-decked to a coach to use the toilet or male returnees being offered a Travel John, a disposable portable urine bag.

5.4.3 In a change to usual practice, returnees on the France charter in October were transported individually to the airport in chase vehicles. Coaches were not used. In the December operation we monitored to France, the use of coaches represented a welcome development.

5.4.4 Coaches carry boxes of games, colouring books and cards, which are routinely offered to returnees on the journey. These are not available in the chase vehicles. Earlier in the year, the boxes were very depleted, but were refreshed later in the year.

5.4.5 Returnees were offered nicotine replacements throughout the transfer, although very few accepted.

5.4.6 As reported for several years and raised again in our reports of operations this year, the use of single-aisle planes and lack of space continues to cause considerable problems. Holding the CIO surgeries is very difficult or impossible. Returnees have long waits before being allowed access to the toilet. Monitors and observers are unable to carry out their duties effectively. The seat belt on sign is lit for extended periods to facilitate the food service. The eight short-haul charters we monitored this year were all single-aisle planes. The four long-haul charters were dual aisle.

In December, we noted that, on the flight to France, food grab bags, rather than trolley service, were offered, which alleviates the problem a little.

## **5.5 Clothing and food**

5.5.1 Returnees mostly arrived in the collection area wearing appropriate clothing and shoes for the journey and destination. We observed some instances of returnees asking to change into clothes that were in their stored property. From our observations, this was always facilitated and a private area was located for the person to change. In a couple of cases, returnees arrived inappropriately dressed (such as wearing shorts and sliders, for instance) and the IRC staff provided basic clothing and shoes as required.

5.5.2 On some occasions, the centre provided returnees with a bag of food to carry onto the coach. Snacks were offered on the coaches and in the chase vehicles. Sandwiches were clearly marked as halal. In-flight meals, also halal, were served once airborne. Bottled water was readily available, with one notable exception, when the supply ran out during the coach trip. This coincided with the air conditioning not working on an exceptionally hot day.

## **5.6 Relationships between staff and returnees**

5.6.1 From our observations, escorts were generally found to be respectful, courteous and doing their best to engage with returnees, despite language barriers and, in some cases, finding the returnees unwilling to engage. Escorts are generally seen to be good at reading the demeanour of their returnee and acting accordingly. For example:

- On a charter to Vietnam, we observed particularly positive engagement between the escort and the female returnees and an attentiveness and sensitivity to the physical and emotional needs of this cohort.
- On a Romania charter, the CC at HW was noted to be consistently friendly and courteous throughout the 'meet and greet' process.
- At Brook House (BH) on a charter to India, the empathy shown by the CC did much to reassure returnees and de-escalate potential issues. The same was observed at YW with returnees enroute to Pakistan, where the CC's calm and reassuring manner prevented a WRB being used.

5.6.2 The standard of entries in the PERs we sampled varied considerably. Some provide detailed accounts of engagement, while others were, at best, minimal and, in some cases, significantly lacked detail. In several instances, the handwriting was also difficult to decipher. In our view, more needs to be done by the escort contractor to ensure consistency.

## **5.7 Returnees' access to interpreting support**

5.7.1 The role of interpreters in ensuring smooth transit and humane care for returnees cannot be underestimated. A significant number of returnees on each flight, regardless of nationality, require assistance, even if they have basic English, as complex instructions are given to them, often in a crowded area and at speed. The CFMT raised concerns about the interpreting services in nine out of the 12 reports submitted during the reporting year.

5.7.2 The CFMT acknowledges that it is difficult to recruit interpreters and we have been told that there is a national shortage. Many do not want to work the arduous hours, which generally include working through the night. Additional pay is offered, but this does not seem to necessarily prove sufficient incentive. Flights for those of a

range of nationalities and, thus, languages (such as removals to France) will always be a challenge.

5.7.3 An online live interpreting system, The Big Word, is used, but staff are often unable to access it, particularly in the middle of the night. Translation apps are also used and provide limited support. We noted, and shared, the frustration of some CCs in trying to access interpretation support.

5.7.4 There is considerable pressure on staff to complete collections within strict timeframes so that the overall removal process is not delayed; ensuring understanding is time-consuming and therefore rarely checked. On numerous occasions, the CFMT noted comprehension was not tested and that, sometimes, returnees did not understand what was happening to them. In one instance, despite a statement that simple language was to be used, a man was told 'body worn video cameras will be used for filming for the security and safety of those present'. It seems unlikely that this was accessible to someone with limited English. On another, a returnee was placed in a WRB after negatively answering the question of 'Are you happy to go to France'? The interpreter in attendance, who did not speak the returnee's language, believed the person being collected had not fully understood the conversation.

5.7.5 The CFMT has noted some excellent examples of sensitive, calm and professional interpreting, which have helped reassure returnees, even when the interpreter was having to work with highly distressed individuals.

5.7.6 Unfortunately, we have also witnessed too many occasions when this was not the case, ranging from interpreters falling asleep at inappropriate points to refusing to sit near returnees on the flight, and declining to support a returnee they considered had been rude. On several occasions, interpreters, though present, had to be encouraged to take an active role by escorting staff.

Some of the challenging issues surrounding interpretation is, the CFMT considers, down to inadequate briefing. Some interpreters seem unaware of the process, who they are supposed to be supporting and when, and on two occasions did not know that they were required to work through the night and that the flight would return from its destination immediately. They are not provided with information regarding the returnee being collected and, consequently, particularly in the case of multi-national collections, are unable to anticipate the language support required. In October, a briefing document was produced for interpreters that covers expectations and conduct. It is hoped that this will lead to an improved service; however, the document does not set out a clear guide to the format of a removal operation or the processes involved, which, in our view, would certainly benefit from improvement.

5.7.7 As a result of the lack of interpreters and the considerable need for language support, the CFMT has seen coach commanders, IRC staff and, especially, escorts (who come from many different nationalities) being used in this role. C&C has explained - and the CFMT accept - that interpreting is not part of the escorting role; that training is not provided; and that interpreting may put escorts at risk. However, the reality is that such a service is routinely provided by escorts, CCs and IRC staff. The CFMT is concerned that this process should be reconsidered to ensure that helpful staff with valuable skills are appropriately supported and deployed to best effect.

## **5.8 The treatment of women being returned**

5.8.1 Of the 12 flights monitored by the CFMT during 2025, seven involved the return of women.

5.8.2 In the main, these women appeared to be treated appropriately. They were allocated a female escorts, given privacy while being searched (with the exception of one collection, which was raised in the CFMT's post-flight report) and provided with separate in-flight toilets and sanitary products, if required.

5.8.3 Several of the women returnees displayed significant distress, with five on open ACDTs at collection and also with UoF having to be employed.

5.8.4 However, the CFMT particularly noted that escorts appeared to go out of their way to reassure this cohort. They demonstrated compassion and empathy to the extent that, on arrival at one long-haul destination airport, the returnees specifically expressed their gratitude, with one warmly hugging her escorts as she disembarked.

## **5.9 Faith and pastoral support**

5.9.1 While no specific instances of such support were noted, the needs of different faiths and cultures appeared to be respected. All food provided to returnees is halal. On two occasions, when items of jewellery had been removed for safety reasons before the flight, escorts checked that the items did not carry religious significance. On another occasion, a r returnee was allowed to keep a small battery-operated device once it was understood that it functioned as prayer beads.

## **5.10 Property**

5.10.1 Returnees' property was transported in the aircraft hold, with each person issued with an individual bag supplied by the escorting contractor. Escorts were responsible for securing property in an AP bag prior to the commencement of induction.

5.10.2 In all cases, returnees were given the opportunity to check their property and were shown how to identify their bag on arrival at the destination airport. Valuables were put in a clear plastic bag.

5.10.3 On three occasions, returnees reported missing cash (in one case £100) that had not been returned - once after being seized on arrival at Dover, and once following a transfer from prison to an IRC. Both returnees were advised to submit a complaint. Other complaints were also made about missing items of clothing. (See also 5.3.4 regarding a missing package.)

5.10.4 One returnee was returned from India to the UK after his paperwork was found not to be in order on arrival in Delhi. His bag could not be collected from the carousel in Delhi, and the Indian authorities were not able to courier it to the UK, as this was outside their remit. The bag, therefore, was to be taken to the lost and found office in Delhi. It was not clear at the time what further action was, or could be, taken.

## **5.11 Complaints**

5.11.1 Returnees are provided with complaint forms as a matter of course, as part of the information pack given to them during collection at the IRC. The CFMT observed that these were generally provided in the returnees' language. Such forms can be completed and handed to the CIO during the flight.

5.11.2 From our observations, the CIO received relatively few complaints. They ranged from issues relating to property and facilitated return scheme (FRS) claims to concerns about poor heating during the coach journey.

5.11.3 On several occasions, when someone made a verbal complaint and was advised to put it in writing, the CFMT saw no evidence that this process was completed.

## **6. Health and wellbeing**

### **6.1 Fitness to fly**

6.1.1 In our 2024 annual report, we queried the process for the removal of returnees from a secure mental health facility and, in particular, who is authorised to release a detained person for removal. The guidance stated that ‘If a detained individual is to be removed from the UK directly from hospital, the Home Office case owner will need to obtain written confirmation from the “treating clinician”’.

After the IMB Secretariat, on behalf of the CFMT, sought legal advice on the lawfulness of the process, the Home Office revised it in mid-2025. A new instruction was issued requiring that individuals subject to immigration proceedings while in hospital have all relevant documents served by trained immigration enforcement officers from regional ICE teams.

6.1.2 Where individuals are in IRCs, returned individuals are deemed fit to fly unless assessed to the contrary by a healthcare professional. On occasion, some may feign illness so they can avoid returning. In one such instance, a paramedic was called to a chase vehicle where a returned person in a WRB had seemingly collapsed. After examination, the paramedic determined that they had no health issues and the individual was fit to fly.

### **6.2 Physical or mental health care risk indicators**

6.2.1 At the staff muster, escorts were routinely informed that risk assessments were available for them to read on the coach. However, on a flight to Albania in February, there were no risk assessments available to escorts travelling to HW.

6.2.2 Those who are most at risk of suicide and self-harm have an ACDT plan in place. Those on a ‘live’ ACDT should have the documents readily to hand, with notes filled in at appropriate times. If not at imminent risk to themselves, a returned individual may be identified as an AAR on a scale of 1-3 following an assessment by a qualified professional. It has not always been clear which returned people are the most vulnerable and whether those on an ACDT have the documents with the escort and filled in appropriately. The main manifest includes a precis that the CFMT reviews at muster, but this information is sometimes outdated, such as, for example where the ACDT has already been closed.

6.2.3 We have asked for risk assessments to be made available to us as part of our preflight information at muster, rather than only seeing them on the coach journey to a collection at an IRC. This has not been facilitated.

6.2.4 On a flight to Vietnam, the main manifest was missing important information, including a live ACDT and a VACP. CCs and their second in command should draw the escort’s attention to those returned individuals who might be particularly vulnerable. However, our observations conclude that this does not always happen.

6.2.5 There have been instances of PERs in which there is no mention or acknowledgement of returnees on an ACDT, a VACP, or those categorised as an AAR, nor any indication of how the escort considered their vulnerability. There has been little evidence that an ACDT is effectively used to inform staff about the care of returnees, particularly in relation to safeguarding or support they may require. On

occasion, completion of live ACDTs appear to be cursory rather than a genuine attempt to document interactions.

### **6.3 The role of the Aeromed paramedics**

Paramedics assume responsibility for the physical and mental healthcare of every person subject to removal. They take on responsibility for confidential medical documents and prescribed medication for the whole of the journey. One paramedic generally travels to the airport in the coach with those being removed. Two paramedics travelled on each of the flights we observed.

### **6.4 Medical interventions**

The paramedics attend to people to address minor ailments during the removal process and dispense over-the-counter and prescribed medication as necessary. Over the course of the reporting year, we observed paramedics administering medication to returnees who had upset stomachs, headaches, panic attacks and travel sickness.

### **6.5 The approach of the paramedics**

From our observations, the paramedics have been thorough, thoughtful and professional. They have sometimes had to determine genuine cases of medical need from those returnees who feign serious illness.

### **6.6 Examination after use of restraint or force**

A paramedic should always examine someone where UoF has been applied for signs of injury, if the individual consents. This did not always happen straight away if the paramedics were not informed about the UoF. We observed one returnee who complained loudly that he had not received his medication whilst in a WRB. This happened several times before an interpreter was called for and explained to the returnee that he had had his full allocation of medicine for the day.

### **6.7 Respect for medical confidentiality**

The CFMT observed paramedics liaising with IRC health staff, noting anything of concern prior to collection. This was done in private, so confidentiality was maintained. Medical notes in sealed envelopes were given to the escorts, along with any medication. These were given back to the returnees towards the end of each flight. Not all wanted to take their medical notes with them and they were under no obligation to do so.

## **7. Preparation for return and re-integration support**

### **7.1 Timely preparation for removal**

7.1.1 Again, as we referenced in our previous report, because we only first see returnees at the point of collection, it is still not possible for the CFMT to make a judgement on whether returnees are properly prepared prior to their removal from an IRC.

7.1.2 On occasion, returnees have been presented wearing inadequate clothing for a long flight, but additional items have been generally provided from stocks held by the IRC at the point of collection.

7.1.3 On one flight to Romania, a particularly challenging returnee stated that his behaviour, which involved a use of force, was due to being given insufficient time to prepare and collect his personal possessions. The CFMT was unable to verify this claim.

### **7.2 Financial support**

Financial support is available under the facilitated return scheme (FRS) to eligible foreign national offenders who have agreed to leave the UK voluntarily. The payment is loaded onto a card, which the successful applicant receives on the plane, with an explanatory letter in English.

There were FRS returnees on all the flights that the CFMT monitored, except for those going to France.

### **7.3 Reintegration programmes**

Reintegration support is offered to those returning to their country of origin, on a voluntary basis, helping them with onward travel from the airport. Those returning voluntarily receive funding, which may also be available to those identified as destitute. New service providers were introduced in 2025 to deliver in-country support for individuals returning after removal from the UK.

### **7.4 Continuing access to independent legal advice**

7.4.1 On all the flights we monitored this year, returnees were offered use of a phone during their journey to the airport to ensure they had the opportunity to make calls to their legal adviser if needed. On most flights, some opted to do so.

7.4.2 On occasion, returnees did not know the phone numbers of their legal representatives, which were stored on the SIM cards no longer on their persons. This highlights the importance of returnees being given the opportunity to take a note of numbers and write them down prior to handing over their IRC centre phones.

### **7.5 Continuing access to HOIE immigration advice**

7.5.1 Each flight is led by a chief immigration officer. Access to the CIO during the flight is potentially available to all returnees, who are told this at the 'meet and greet'. This is an opportunity to raise immigration issues with the only person who has the authority to address them during this last stage of the removal journey. In monitoring (with the agreement of the returnees) these 'surgeries', the CFMT observed questions that covered issues relating to:

- FRS payments (see 7.2)
- asylum applications
- missing documents (especially passports),
- missing money
- the period of time for which returnees are barred from re-entering the UK,
- fitness to travel
- other questions around the technicalities in their removal notices.

7.5.2 Typically, these surgeries will be held at a specified point in the aircraft, with returnees being brought by security staff. Occasionally, the CIO visits people in their seats and, on one occasion, the CFMT observed the CIO speaking to Albanian returnees when the aircraft was waiting on the tarmac in France to travel on to Albania.

7.5.3 The short duration of flights to France creates particular difficulties in accessing the CIO. On other routes, the single aisles of the aircraft used on short-haul flights are often blocked for periods during meal services, preventing the CIO from moving to meet returnees. Turbulence can also require all passengers to remain seated, further restricting movement around the aircraft.

7.5.4 On several occasions, the CFMT noted that the number of escorts and security personnel surrounding the returnee at a surgery felt intimidating to the person. Questions of confidentiality were also raised, as it would be possible for others to listen to potentially sensitive conversations.

7.5.5 While last year the CFMT reported that a professional interpreter was present at the CIO surgeries on every flight, in 2025 this was not always the case. While last year the CFMT reported that a professional interpreter was present at every CIO surgery on every flight, in 2025 this was not always the case. At times, no interpreter was on board; on other occasions, they were not called to assist, at least initially. Where interpreters were available, returnees benefited significantly. On one flight, however, the CFMT observed an escort translating for several of the CIO's surgeries, which is not good practice.

## **7.6 Contact with family or friends during the removal process**

7.6.1 As in section 7.4, the CFMT observed that on all flights monitored, returnees were offered access to a phone to call family and friends. Many took the opportunity to do so.

7.6.2 With interpreting support absent on some operations, the CFMT raised concerns that certain returnees did not understand that they had access to a phone during the journey to the departure airport, and/or that they needed to ensure they had important numbers written down before their mobile phone was handed back to centre staff when leaving the IRC.

## **8. The work of the CFMT**

**8.1** The CFMT is composed of IMB members from Boards across the prison estate. The CFMT had seven members at the beginning of the year and five at the end of the year.

**8.2** The CFMT is authorised to accompany 12 flights per year and members can monitor additional collections from IRCs as required. We select the flights to be monitored from a schedule provided by HOIE and will inform them of this intention approximately one week before the flight.

**8.3** The monitoring process includes:

- Attendance at the escorts' muster at Mitie C&C headquarters at Gatwick.
- Travel with the escorts to an IRC (generally selected according to the number of returnees to be collected/the presence of women returnees/vulnerability of returnees to be collected).
- Monitoring of individual collections and travel onward to the airport with escorts and returnees.
- Observing returnees boarding the aircraft.

During the flight, we maintain a presence throughout by talking to returnees and their escorts, observing the CIO's surgeries, reading entries in ACDTs and speaking to senior staff and medics, etc.

**8.4** We presented formal reports to HOIE on each monitored operation and received formal responses, to which Mitie C&C also contributed.

**8.5** Our team leader's quarterly meetings with HOIE and C&C continued.

## **Annex A**

### **Use of force case studies**

#### **Case study 1**

The individual was placed in a WRB after being asked twice whether they were willing to travel to the destination country and twice replying that they did not want to go. They communicated at a basic level through an interpreter who did not speak their native language. In the CFMT's view, they were making a statement of fact rather than demonstrating resistance. There was nothing in their demeanour to suggest potential disruptive behaviour; the individual remained calm and compliant, standing with their arms outstretched while the belt was applied.

The interpreter later told the CFMT member observing that they did not believe the individual had fully understood the earlier conversation, a view supported by the fact that a translation app was used on the aircraft to explain to them why they had been placed in a WRB.

The PER and all four UoF reports indicate that the individual was compliant throughout the journey: they ate and drank, were described as 'well behaved' and 'got on with staff'. On boarding the aircraft and noticing that others were not in WRBs, the individual became 'upset' and a 'bit angry', further indicating they had not understood the earlier process.

#### **Case study 2**

The individual was located in the IRC's care and separation unit (CSU) at the time of collection. They were on a live ACDT and had been subject to one-hour observations prior to handover. It was also noted that they had declined to participate in an ACDT review.

The individual was presented by four fully equipped IRC staff in rear-stacked handcuffs (where their hands are cuffed behind their back) to a small side room adjacent to the segregation unit, where the 'meet and greet' was conducted.

On transfer, the individual expressed dissatisfaction with IRC staff, stating that some personal items were missing and that they wished to change clothing. They also made inappropriate comments regarding who should be subject to removal. As a result of this behaviour, they were placed in a WRB. Difficulties were encountered when applying the belt.

The individual travelled to the airport in a van and was verbally abusive towards escorting staff. A translator was present and was used frequently, despite the individual demonstrating the ability to communicate effectively in English. A medic was also present.

During the journey, the individual remained compliant while in a restricted position, but they refused to engage with escorts. However, on arrival at the airport, they spat at an escort after being informed that they could not smoke in the vehicle while waiting to board. They were subsequently escorted compliantly onto the aircraft, with escorts maintaining control of the WRB.

Shortly after boarding, the individual removed their seatbelt, attempted to stand, kicked out and became angry and aggressive, making personal threats towards escorting staff.

UoF documentation notes that the individual was placed in an approved hold because the belt did not fully restrict movement. Head support was applied as part of the intervention. Despite de-escalation efforts, the individual made a further attempt to strike out at staff.

Pain-compliance techniques were used as part of the intervention. Head support was applied and later removed before take-off. A medic was present throughout and witnessed the holds and head support.

Later in the flight, the individual was able to remove the WRB without authorisation. As they were compliant at this point, the decision was made not to reapply the WRB. On arrival at the destination, the individual disembarked the aircraft.

## ANNEX B: Action plan issued by the Home Office in response to the Charter Flights IMB 2024 annual report

Ref	Recommendation / Issue / Concern	Accepted / Partially Accepted / Not Accepted	Comments
1.	<p>It is neither fair nor humane to subject people being removed from the country:</p> <ul style="list-style-type: none"> <li>• to a process for their delivery to the airport, which always takes place through the night, to meet an arrival timetable HOIE has agreed with the overseas authorities and</li> <li>• (as part of this process) to hours of confinement in vehicles to reach departure airports selected by HOIE.</li> </ul> <p>A fairer and more humane approach should be adopted.</p>	Not accepted	<p>The scheduling of charter flight departures must account for various considerations, including the preferred arrival times stipulated by receiving countries. These preferences are shaped by factors such as the need to avoid peak arrival periods and to ensure the availability of adequate official and support staff for efficient processing upon landing.</p> <p>Morning arrivals offer particular advantages, as they facilitate onward travel during daylight hours for those being returned.</p> <p>To enhance delivery reliability, we operate from multiple airports to reduce risk and avoid dependence on a single location. We regularly review our airport portfolio and engage with new airport operators whenever better options emerge for charter operations, considering factors like proximity to IRCs and optimal operating conditions.</p> <p>Immigration Enforcement strives to take a fair and humane approach, coupled with balancing the wellbeing, welfare and safety to return those who have no lawful right to remain in the United Kingdom and Foreign National Offenders who have committed criminal offences.</p>

2.	The processes used to identify interpretation needs are unreliable and should be improved. Consideration should be given to having translators on all operations, including ones where it might be considered most of the returnees might speak English.	Not accepted	<p>The requirement for interpreting assistance is communicated to Returns Logistic (RL) Charters by the case owner when an individual case is referred for charter removal. This need is determined using information from Home Office systems and prior interactions with the individuals being returned. After an individual has been inducted at an IRC, staff are expected to notify RL Charters if an interpreting need is identified during induction that was not previously flagged, or to withdraw the request if the induction determines that the individual's English proficiency is sufficient for the removal process.</p> <p>Following the CFMT IMB 2024 annual report, the Home Office agreed to take steps to improve interpreter services on charter flights. Since September 2025 more interpreters are be requested for charter flight operations, with the objective of having an interpreter at each IRC and STHF where individuals being returned are collected for a flight.</p> <p>Interpreters are not civil servants directly employed by the Home Office and therefore have the autonomy to select assignments according to their preference. Charter work is generally less favoured among interpreters due to its extended and often irregular hours, as well as required travel. To encourage participation in charter flight assignments, interpreters receive an additional fixed payment on top of standard fees.</p>
----	--	--------------	---

Ref	Recommendation / Issue / Concern	Accepted/Partially Accepted/Not Accepted	Comments
-----	----------------------------------	--	----------

3.	<p>In the Board's view, the risk assessments should be written in such a way to ensure clarity, avoiding, for example, too many acronyms. This would mean that the document could be easily understood by escorting staff and observers.</p>	Not accepted	<p>The board was asked to clarify which risk assessments the recommendation applied to and confirmed that it pertains to assessments given to escorts involved in the operation. Escorting staff are trained to understand risk assessments and our contracted service provider have confirmed that there have been no issues identified with understanding acronyms. Observers seeking additional information regarding risk assessments during operations are advised to consult the coach commander for further clarification.</p>
4.	<p>The use of single aisle aircraft presents a challenge to both the Chief Immigration Officer (CIO, a Immigration Enforcement representative who travels on flights) and the returnees wishing to speak with the CIO. On occasion, the CIO is unable to talk to everyone because aisles are blocked for (flight) operational reasons. Consideration should be given as to how the CIO's 'surgery' could best be carried out so that all returnees are given an opportunity to meet with the CIO.</p>	Not accepted	<p>The type of aircraft selected for Home Office short haul charter flights is regularly reviewed to ensure it meets the current level/rate of returns required by the department. Currently this need is met using single aisle aircraft for these flights. There is a significant price increase between single and twin aisle aircraft, therefore making best use of public funds when procuring these aircraft is another factor taken into consideration. Furthermore, due to ongoing construction work on the infrastructure at Tirana airport, twin aisle aircraft are unable to operate into the airport which currently prevents the use of these aircraft for this destination.</p>
5.	<p>The length of time returnees are held in coaches, before the road journey to the selected airport even begins, is another long-standing concern of the CFMT. These long periods of confinement have continued and should be reduced.</p>	Not Accepted	<p>Reducing coach waiting times remains operationally challenging due to the geographic locations of our centres and departure airports. We acknowledge the impact extended waiting times can have on individual wellbeing and take steps to mitigate this by providing recreational packs to all people being returned.</p> <p>To further reduce delays and in response to this recommendation in previous reports, we implemented the deployment of advance parties to prepare documentation and property ahead of time, helping to streamline the collection process. Additionally, we have developed a tracking process to monitor coach waiting times, identify trends, and investigate any outliers, whether particularly long or unusually short to continuously improve our procedures.</p>

Ref	Recommendation / Issue / Concern	Accepted / Partially Accepted / Not Accepted	Comments
6.	<p>The plan given in response to our previous annual reports, detailing the various steps escorts would take to achieve interpreting support for returnees when a professional interpreter was not present, has been achieved to only a limited extent. The plan was impressive, but it needs to be fully delivered.</p>	Accepted	<p>In response to feedback from Immigration Removal Centres (IRCs), the Home Office identifies the requirement to provide interpreters for charter operations. Where an interpreter is not available, Escorting Officers must follow the steps outlined below to ensure effective communication:</p> <ol style="list-style-type: none"> <li>1. <b>Contact Big Word</b> – Attempt to secure an interpreter via the Big Word service.</li> <li>2. <b>Phone Interpretation via Another Coach Commander</b> – If Big Word is unavailable, contact another Coach Commander who has access to an interpreter and request telephone translation assistance.</li> <li>3. <b>Use a Translation App</b> – If no interpreter is available via phone, use our trusted translation app to facilitate communication.</li> <li>4. <b>Utilise Bilingual Escorting Officers</b> – Only as a last resort, an Escorting Officer who speaks the required language may provide interpretation support.</li> </ol> <p>We acknowledge the importance of clear communication and continue to work on improving this process to ensure dignity, understanding, and compliance throughout the operation.</p>
7.	<p>We recommend that further discussions take place with IRCs about locating suitable areas where – once they have gone through the induction process – returnees can be held before boarding a coach.</p>	Not accepted	<p>We previously reviewed this option following site visits and discussions with staff at Colnbrook, Harmondsworth, Brook House, and Tinsley House IRCs. At the time, due to a range of identified risk factors, the option was not pursued further.</p>



This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications>

Any enquiries regarding this publication should be sent to us at [imb@justice.gov.uk](mailto:imb@justice.gov.uk).