

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
TO THE MINISTER				
1.	As noted in our previous report, the Home Office has a duty of care for those with mental health problems and needs to ensure they are safe in the community they are released into. Robust support is required for detained people with mental health people who are released on bail.	Partially Accepted	The Home Office is not fully responsible for the care of individuals within the community. However, in cases where the detained individual requires support and/or accommodation from the Local Authority, it is the responsibility of the case owner and - where allocated - the non-detained casework team, to arrange a Local Authority needs assessment prior to release from detention. The Adults at Risk in Immigration Detention Services Order (DSO) 08-2016 'Management of adults at risk in immigration detention' covers the release of vulnerable individuals (paragraphs 64 to 70 refer). In line with the DSO, where there are concerns about the mental health of an individual being released on bail from an immigration removal centre (IRC) then Home Office Detention Engagement Teams (DETs) must be informed. Clear communication channels enable early identification and escalation of vulnerabilities and barriers to release. DETs can promptly raise concerns about vulnerable residents, supporting timely, coordinated action. As part of this process, the Detention Oversight Team maintains effective engagement with caseworkers, ensuring access to up-to-date information, close monitoring of release referrals, and appropriate safeguarding. Relevant training is also available to support consistent case management for individuals with mental health needs. At a local level Mitie Care & Custody (Mitie C&C) will work alongside all Home Office teams noted above with both the preparations for, and the actual release of, an individual.	Ongoing
2.	Commission an independent evaluation of the Rule 35 framework to assess whether current thresholds, timescales, and decision-making processes	Accepted	The IMB were involved at a national level as part of the recent review of Detention Centre Rule 35. The outcome of the review was communicated to the IMB by Minister Norris by letter sent electronically on 9 March 2026.	Complete

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	adequately protect vulnerable individuals from prolonged or inappropriate detention. Ensure that Rule 35 outcomes are transparently monitored at a national level, with regular publication of performance data to support accountability and continuous improvement.		The Home Office already publish quarterly data migration transparency data on the numbers and type of Rule 35/32 reports received. This includes the numbers of those received who are released as a result of the Rule 35 report.	
3.	We recommend commissioning a national review of the use of Rule 40 (temporary confinement) and Rule 42 (removal from association) to ensure that these measures are not used inappropriately for individuals whose behaviour is primarily driven by mental-health needs rather than disciplinary concerns. Also, there should be an improvement in communication with healthcare teams to ensure that vulnerabilities identified during Rule 35 processes or clinical assessments are reflected in decisions about segregation and association	Accepted	DSO 02/2017 ' Removal from Association and Temporary confinement ' was published in November 2025, following widespread consultation and directly addresses the issues raised in this recommendation. The updated DSO strengthens safeguards to ensure that removal from association and temporary confinement are not used inappropriately where behaviour is primarily linked to mental health needs rather than disciplinary concerns. It makes clear that use of the Rules must be a last resort, must be individually justified, and should be avoided for individuals with serious mental health conditions unless strictly necessary to manage an immediate safety risk, with any adverse impact explicitly considered and mitigated. The DSO also significantly enhances requirements for healthcare engagement and multidisciplinary oversight. It mandates early and ongoing involvement of healthcare teams, daily multidisciplinary reviews, and explicit consideration of vulnerabilities identified through Rule 35 reports, clinical assessments, Adults at Risk processes, and ACDT arrangements when authorising, reviewing, or extending use of the Rules.	Complete

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
			Decisions must reflect healthcare advice, with clear routes for healthcare to recommend a return to association on medical grounds and for those recommendations to be formally considered and recorded.	
4.	We recommend increased investment in bail accommodation pathways, for TSFNO to reduce excessive waits for suitable placements.	Rejected	FNORC have already taken action that responds to this recommendation, having developed an Accommodation Improvement Plan elements of which cover improvements to accommodation pathways for TSFNOs.	N/A
5.	Funding should be in place to increase security at the IRC to prevent the increasing levels of throwovers on the Colnbrook site and the reduction of contraband and illicit goods getting into the Heathrow estate. In addition, search technology should be improved to ensure that illicit substances are prevented from entering the Heathrow estate.	Accepted	Since concerns related to illicit drugs entering the IRC were identified during a HM Inspectorate of Prisons (HMIP) inspection of Harmondsworth IRC in 2024, significant work has been undertaken across Heathrow IRCs to combat the issue. This work has resulted in an increase in the number of staff, resident, area, and visitor searches. This approach has been supported by the reintroduction of staff drug testing on both a random and intelligence led basis. Mitie C&C have developed excellent working relationship and a collaborative approach with the Metropolitan Police Service, ensuring that Mitie C&C are able to respond to intelligence in a more joined up fashion. Two mobile phone detector devices were put into operation at the end of February 2025. Mitie C&C have established a dedicated search team and employed technological advances, including heat seeking cameras, mobile phone detection, covert cameras and worked closely with the Met Police and Operation Adder to employ covert tactics to prevent drugs ingress and including where this is linked to staff corruption. Mitie C&C will continue to adapt their approach as needed.	Complete

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
6.	There should be a review of the high number of unsubstantiated complaints both from the contractor and the Home Office, to assess whether investigative processes meet required standards of transparency. Improve communication with detained individuals regarding complaint outcomes, making sure that responses are clear, timely and accessible, including translated versions where required. Detained individuals should be made aware as to how their complaints are handled and how to escalate their complaint, especially complaints relating to property	Accepted	Handling of Complaints DSO 03/2015 'Handling complaints' was published in February 2025. It is currently undergoing further review, with publication of an updated version expected by summer 2026. This DSO sets out the guidance and steps to be followed as part of the complaints process. At present, assurance reviews are conducted by Mitie C&C with further assurance provided through the local Home Office Compliance Team and additional quality assurance reviews undertaken by the Detention Services Complaints Team. This approach ensures that residents are appropriately informed and supported throughout the complaints and escalation process. A multilingual animated complaints video, available on arrival and as part of induction, explains the complaints process and escalation routes in an accessible format, improving awareness of the complaints process A high rate of unsubstantiated complaints does not necessarily indicate poor investigations. Complaints may lack evidence, fall outside acceptance criteria, or be received anonymously or late. Current guidance already requires clear outcomes with reasons, meeting transparency standards. Clear communication on outcomes and escalation routes is already mandated under existing DSO requirements, including accessibility and translation where needed, and is supported through standard response templates, annexes, updated forms, and guidance; particularly for high-volume areas, such as property complaints.	Complete
TO THE HOME OFFICE IMMIGRATION ENFORCEMENT				
7.	The Board continues to be very concerned about the deterioration in the mental	Partially accepted	Additional funding to NHS was agreed as part of an operational uplift in 2024 and Detention Services remain committed to working in partnership with NHS teams to ensure adequate resourcing for healthcare teams.	Ongoing

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	health of many detained people, with too many detained people are resorting to self-harm. It is imperative that appropriate support, care and mental health services are promptly provided to individuals grappling with mental health issues. In addition to improvements in healthcare provision, we believe many of these issues could be reduced through better engagement between the Home Office DET team and detained people, provided they receive stronger support from remotely based caseworkers. In our view, the DET team often acts simply as the messenger in the process, which can understandably lead to frustration for all involved		As part of the above funding an increase in the number of Mental Health nurses on site has been in place since August 24, and a MSc Psychology placement (12 months) took place from July 2024 to July 2025. Mental Health Multi-disciplinary meetings regularly take place, as do group working sessions. The Healthcare provider also now has a robust triage system following referrals to the Psychology team, to better inform the level of risk and mental health needs of residents. A workshop on Managing Trauma was delivered to residents in August 24. The Psychology team is currently developing another two workshops - 'Managing Voice Hearing in Detention which has been rolled out for one-to-one sessions. Managing Strong Emotions in Detention has started with one-to-one sessions and workshops on-going. Mental health provision has been strengthened, enabling the service to operate seven days a week. This increase has contributed to a reduction in the waiting list, with urgent referrals now prioritised and seen within 48 hours. Weekly Mental Health Multi-Disciplinary Team (MDT) meetings continue to take place, with minutes formally recorded. Resident workshops delivered by the psychology team have been introduced and are now embedded, including sessions on Hearing Voices and Managing Strong and Overwhelming Emotions in Detention.	
8.	There are many people detained at Heathrow IRC who have been identified as adults at risk (AAR) Level 3 and who have been in the detention centre for more	Rejected	Every decision to detain or maintain detention, where the detained person is someone who has been identified as an adult at risk, is a balancing exercise that must take account of the person's level of vulnerability and balance this against all known immigration factors. Although the presumption of liberty is strengthened, this does not mean that the person	N/A

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	than 80 days. These individuals should be released from HW IRC as soon possible		should automatically be released, as the immigration factors in each case may mean that detention remains appropriate and proportionate.	
9.	We still believe that people with severe mental health problems should not be detained in the CSU for extended periods of time. Detained individuals with severe mental health issues should be treated in a mental health setting external to the Heathrow detention centre	Partially Accepted	In addition to the comments made at Recommendation 3, there will always be some cases where DC Rule 40/42 is needed for those with Mental Health problems where they have compromised the safety and security of the centre or who are a risk to themselves, other detained individuals and staff. Detained individuals will only be placed in the care and separation unit under Rules 40 and 42 of the Detention Centre Rules 2001 as a last resort and in line with the DSO 02/2017 'Removal from association Detention Centre Rule 40 and temporary confinement Detention Centre Rule 42' which was revised and republished in November 2025. Particular care will be taken for those with mental health concerns and known vulnerabilities. They will be treated in accordance DSO 02/2017 and DSO 04/2020 'Mental vulnerability and immigration detention-non clinical guidance' where appropriate. Residents that require a secure mental health bed in the community may need to wait until a suitable bed becomes available. Both the Supported living facility (SLF) and healthcare extended care unit will be considered and may be used to house residents with mental health problems, where appropriate.	Complete
10.	The increased number of TSFNOs detained at Heathrow IRCs has led to a change in the demographic's population, as noted in our previous report.	Accepted	A review of the VR (Violence Reduction)/safety strategy was undertaken in January 2026 following initial publication in late 2025. Shifting the focus beyond statistics, a violence reduction survey was distributed to residents in January 2026. This initiative aims to gather resident feedback, address concerns, and identify key issues. The insights from the survey are being used to develop	Complete

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	This continues to lead to increasing levels of assaults, verbal abuse and racial abuse from detained people. In the Board's view, it is important that a violence reduction strategy is put in place to help protect everyone in the detention centre		actionable plans with clear ownership and completion timelines, ensuring that all identified issues are effectively addressed and resolved. In December 2025, the Safer Communities Team led a proactive five-week initiative targeting individuals identified as most at risk of antisocial or violent behaviour. Drawing on real-time intelligence, the programme focused on key nominals, including those generating frequent command centre responses.	
11.	In the Board's view, the Home Office should improve the timescales for those who wish to return to their home country voluntarily. Delays to voluntary returns can acerbate anxiety and worsen the mental health of detained people. It is important to mandate faster processing of voluntary return cases, where there are no barriers to removal exist	Partially Accepted	Immigration Enforcement work to identify those residents who wish to voluntarily return. Caseworkers are escalating their cases and ensuring progress is maintained. Voluntary departure surgeries support residents who wish to return and help to ensure that all necessary paperwork is completed efficiently. A pilot offering some people in detention the chance to leave the UK voluntarily (from detention) and receive financial assistance is currently being evaluated. Casework maintains clear oversight of all individuals in the detained estate who have expressed a wish to depart voluntarily, with cases tracked via a centralised system. Weekly case surgeries are held to ensure progression in line with expected timescales. FNOs are referred to the Home Office for deportation immediately following sentencing. The timeliness of criminal court proceedings and extensive periods on remand means many prisoners will reach their ERS window immediately or very soon after they are sentenced. It is therefore not always possible for the Home Office to carry out all the case working and administrative processes as soon as an FNO becomes eligible for removal under ERS, even when they wish to return voluntarily.	Ongoing

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
			The introduction by the Ministry of Justice (MoJ) of the Early release scheme 0 (ERS0) measures is expected to come into force in September 2026 which will remove the requirement for an eligible FNO to serve any minimal custodial period before they can be removed.	
12.	A monitoring system should be introduced to flag cases approaching prolonged detention periods, ensuring a timely escalation and review of the case. There should be increased investment in bail accommodation pathways for TSFNO to help reduce excessive waits for suitable placements. In addition, collaborative work with the probation and accommodation teams should be improved to reduce a 3–4-month delay in securing bail and accommodation for TSFNOs.	Rejected	A new monitoring system is not deemed necessary. Case progression panels (CPPs) were introduced in February 2017 by Immigration Enforcement in response to recommendations made in Stephen Shaw’s 2016 review into the welfare in detention of vulnerable persons. They are designed to safeguard against excessive lengths of detention, provide an independent assessment of case progression, and reduce the potential for unlawful detention litigation. CPPs provide a second line assurance function by reviewing the appropriateness of ongoing detention for all individuals detained at 3-month intervals (or when additional scrutiny is required given vulnerability). They drive case progression and casework diligence to: • effect departure from the UK whether by administrative removal, voluntary return or deportation • provide additional oversight for the identification and management of the detention of potentially vulnerable people Where there are concerns about an individual’s length of stay, Detention Services flag these to case owners.	N/A
13.	In the Board’s view, the Home Office should strive to strengthen communication between all teams operating within the immigration estate, including the Probation Team,	Rejected	Once a person is in detention, regular reviews are undertaken to ensure that their detention remains lawful, appropriate and proportionate. Case Progression Panels with independent panel members provide additional assurance and challenge on the progress of cases of individuals in detention, reinforcing the	N/A

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	DET and the courts. Improved coordination will support accurate and timely decision-making, helping to ensure that detained people are not subject to unnecessary delays in receiving release directions, removal decisions or appropriate accommodation.		consideration of removability, vulnerability and risk factors in decisions to maintain detention. Where it is appropriate and in line with case working policy/guidance or DSOs, multi-disciplinary team meetings are convened, bringing together all involved parties to ensure that cases are progressed appropriately in a timely manner. Senior managers (G6/G7) within IE leading teams involved in detained case working meet on a weekly basis to discuss performance and highlight emerging trends.	
14.	In the Board's view, the infrastructure at the Heathrow IRC still needs crucial investment, including heating, ventilation, electrical infrastructure and IT infrastructure in Harmondsworth and Colnbrook. It is very important to improve the living conditions of detained people. We urge the Minister to fund improvement to the Heathrow IRC estate. An independent structural and systems audit of both sites should be commissioned, focusing on recurring failures in power, water, gas and communications, and a	Accepted	A significant infrastructure investment and capital work programme is underway at Heathrow. To date this has seen the renovation of Sahara, Dove, Gorse and Cedar units and the creation of a new reception area. These improvements entail: full re-decoration programme, a renovation of existing sanitation areas, installation of additional showers, toilets and washbasins, and installation of new bedroom furniture, desks, lighting, and improvements to air flow. The core lift in Harmondsworth was also fully repaired in January 2024. In the units recently renovated, a significant improvement was achieved regarding ventilation which will be replicated during all residential renovation projects. A further investment project is underway to replace infrastructure which will provide a more balanced ventilation system. A full refurbishment of Fir House was completed in November 2025 and in the Colnbrook reception area in early 2026.	Complete

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	timetable for remedial works needs to be published. We recommend ensuring that future refurbishment plans include trauma-informed design principles, improved accessibility and environments that support wellbeing, privacy and dignity. In addition, there should be an allocation of ring-fenced funding for urgent infrastructure resilience needs, including back-up systems to prevent repeated service outages that compromise safety and humane treatment. It is important to ensure internal tracking of detained people approaching long detention periods to make sure that any escalation is timely to the Home Office.			
TO THE DIRECTOR/CENTRE MANAGER				
15.	As noted in our previous report, the IMB continues to support the broader use of the Colnbrook care suite for short-term respite,	Rejected	At present there are no plans for a supported living facility at Harmondsworth. The facility at Colnbrook can be used by residents at both sites	N/A

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	particularly for detained people with deteriorating mental health conditions. We also urge the contractor to replicate the Colnbrook care suite facility in Harmondsworth			
16.	It is our view that improvements need to be made to the security of the Heathrow estate. We believe the contractor should work to reduce the number of throwovers and reduce the number of illicit drugs that enter Heathrow IRC. Addressing this issue should involve implementing stricter security protocol or enhancing surveillance and inspection procedures. The contractor should record the number of illicit drugs that enter the centre correctly, i.e. weighed, counted and documented. It should be made clear what happens to these illicit items when confiscated	Partially Accepted	As already noted at recommendation 5. A revised drug strategy is now in place, and Heathrow staffing has significantly increased since this report was made. The staffing levels of the Security team reflect a steady increase, particularly in Security DCOs and DCOMs, to support operational demand and respond to an increase of throwover/illicit substance activity. All drug finds that are seized by security are past over to the police. Actions are taken by the CSP and the police, depending on the amount seized. The police will always be informed of drug finds and they destroy all substances.	Complete
17.	Ventilation systems within the Heathrow IRC still need a thorough overhaul , as some	Accepted	A significant infrastructure investment and capital work programme is underway at Heathrow. To date this has seen the renovation of Sahara, Dove, Gorse and Cedar units and the creation of a new reception area.	Complete

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	wings continue to be extremely hot or cold. There appears to be little that can be done to regulate the temperature. This has a negative impact on detained people, as these conditions can disrupt their sleep patterns		In the units recently renovated, a significant improvement was achieved regarding ventilation which will be replicated during all residential renovation projects. A further investment project is underway to replace infrastructure which will provide a more balanced ventilation system.	
18.	From the Board's observations, the food menu needs to improve, as there is limited choice and very little variety, especially of healthy, fresh options. The centres should work with the catering team to ensure detained people receive clear information about portion standards and menu planning to help reduce food anxiety and unnecessary complaints.	Accepted	Although we acknowledge this recommendation, the current situation is much improved with a dedicated catering provider, Aramark taking on responsibility since March 2026.	Ongoing
19.	Food-related complaints should be monitored to identify trends and address operational issues promptly.	Accepted	The current situation is much improved from that commented on in 2024. Issues were identified and resolved with catering staff, and as noted at recommendation 18, a specialised catering company was brought in in March 2026.	Ongoing
20.	We recommend strengthening efforts to actively promote educational opportunities,	Accepted	The Centre continues to offer a wide range of activities and educational opportunities for residents.	Ongoing

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	including targeting outreach to detained people who may benefit with certified courses.		There are formal accredited educational courses available in a number of subjects as well as opportunities for residents to learn other skills	
21.	There should be a continued expansion of stress-reducing and wellbeing activities, especially for those with mental health or behavioural vulnerability.	Accepted	In addition to the response outlined for Recommendation 20, the centre continues to expand the provision of stress-reducing and wellbeing activities. Mental health teams lead a range of structured workshops and interventions, including sessions on managing trauma, coping with hearing voices in detention, understanding trauma and hardship, managing strong or overwhelming emotions, and strategies to support individuals in detention settings. Further interventions include “Tree of Life” and narrative resilience work, which are designed to build coping strategies and emotional resilience, particularly for those with identified mental health or behavioural vulnerabilities. These activities are delivered through dedicated steering groups and form part of a broader, ongoing programme to enhance wellbeing support across the centre.	Ongoing
<i>To Healthcare provider</i>				
22.	The Board continued to find that feedback from the healthcare team to the weekly questions and concerns set out in the IMB monitoring report was often not provided in a timely manner, and we would, again, encourage this to be improved	Accepted	Healthcare responses to weekly IMB questions and concerns have at times been delayed due to technical limitations affecting access to NHS email inboxes. To mitigate this, an interim arrangement has been agreed with the IMB to raise queries directly with healthcare teams in person, enabling more timely resolution. Work is ongoing to identify a longer-term solution to improve communication and ensure consistent, timely responses going forward	Ongoing
23.	Wait times for Rule 35 assessments vary and, in some cases, the wait time for an	Rejected	DSO 09/2016 ‘ Detention Centre rule 35 and short-term Holding Facility rule 32 ’ does not stipulate a timeframe in which a R35 assessment should be completed by a GP within. The GPs are restricted on the number of R35s they can complete at any one time.	N/A

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	assessment is more than 21 days. Again, we believe this should be improved, given the increasing number of people in detention who are considered adults at risk. In addition, it is important to provide targeted mental health support for individuals detained for long periods, especially those who have been held for more than 200 days.			
24.	The number of people experiencing mental health issues is increasing at Heathrow IRC. We believe it is important that external mental health beds in the community are made available to detained people who present with a severe mental condition and cannot be safely managed within Heathrow IRC. There needs to be improved coordination to ensure timely escorts for hospital appointments and reduce	Partially Accepted	Mitie C&C continues to work with the Home Office and PPG to maintain sufficient escort provision and support attendance at healthcare appointments. Performance has improved since the period reflected in the report, with fewer missed appointments. Pre-planned escorts have been increased to eight per day across the Heathrow IRC estate, and the Memorandum of Understanding between Mitie and PPG is under review (June 2026) to assess whether further increases are required, subject to contractual agreement. Additional capacity is supported by two ringfenced beds at Colne Ward, Hillingdon Hospital, alongside mental health provision delivered in part by North London NHS Foundation Trust.	Ongoing

HEATHROW IMB 2024 - ANNUAL REPORT – ACTION PLAN

Ref	Recommendation	Accepted / Partially Accepted / Not Accepted	Comments	Progress Ongoing or completed
	cancellations that heighten the distress of those who have been detained. Communication with detained individuals should be improved so they are kept informed about the status of their medical referrals and the expected waiting times for appointments. Internal coordination should be improved to ensure escorts are available for urgent and non-urgent hospital appointments. There is also a need to improve escort planning in order to minimise missed hospital appointments			