

To Anna Turley MP, Minister for Border Security and Asylum  
Sent via e-mail: [Correspondence.MigrationMinisters@homeoffice.gov.uk](mailto:Correspondence.MigrationMinisters@homeoffice.gov.uk)

12 August 2026

Dear Minister Turley,

### **Operation Hillmore: Independent Monitoring Board (IMB) concerns**

As you may know, the IMB has been monitoring the treatment of people detained under the UK – France Agreement on the Prevention of Dangerous Journeys, since its adoption in August 2025. Pursuant to our statutory duty to monitor and report on whether proper standards of care and decency are maintained in immigration detention, I am now writing to share with you the IMB's concerns about this operation. Some of these have already been described in our recently-published National Annual Report for 2025,<sup>1</sup> but they have continued to be sufficiently serious in the first half of 2026 that I feel it is necessary to alert you to them again.

The IMB is concerned that Operation Hillmore is placing highly vulnerable, newly-arrived individuals, including children and survivors of abuse, in detention, under processes that were not designed for this cohort's specific needs, and in such a way as to weaken safeguarding procedures, access to legal support and case resolution.

We have presented our observations on Operation Hillmore to Home Office officials locally – at the Kent Coast STHF, at Yarl's Wood, Heathrow and Gatwick IRCs, and via the Charter Flight Monitoring Team (CFMT) – as well as at national level to Frances Hardy, Deputy Director, Detention Services, and Mark Griffiths, Head of the International and Returns Services Command. I would like to acknowledge the constructive way in which they have engaged with us to address our concerns and to attempt to put mitigations in place. For my part, I was recently given a full day tour of the end-to-end processes at the Kent Coast by the local Board and Home Office staff, which I found extremely informative.

Nonetheless, and conscious that Operation Hillmore is a pilot operation, I consider that our concerns remain sufficiently serious to warrant alerting you directly, and making these concerns a matter of public record. They are as follows:

#### ***Detention of children***

The unduly high number of age disputes – and those subsequently assessed to be children – is particularly troubling. Your officials have informed the IMB that 304 age disputes have taken place between 15 August 2025 and 1 May 2026, of which 94 (31%) were assessed to be children. The IMB is therefore concerned that child safeguarding mechanisms are ineffective, and believes more should be done to ensure that those whose age is under dispute are not detained in the first place. As an individual may not have formally claimed to be a child until some time after arrival in

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<sup>1</sup> *National Annual Report 2025*, IMB, available at:  
<https://cdn.websitebuilder.service.justice.gov.uk/uploads/sites/13/2026/06/IMB-2025-National-Annual-Report.pdf>.

detention, the IMB feels there should be more proactive identification of children by detention centre staff. We also have concerns about expressions of scepticism by some officials about the statements made by people being detained under Operation Hillmore, especially when age disputes are only initiated later into a person's detention. I note the recent publication of similar concerns by other organisations who work with people in detention.<sup>2</sup>

Age assessment processes have been flagged as slow at Heathrow in particular, with delays observed of up to three weeks for an assessment to be conducted by social services following the initiation of an age dispute. In two cases observed by the Heathrow Board, it took 40 days or more from arrival at the IRC to age assessment. The Home Office has shared with us that, of the March age dispute cases recorded nationally (most of which were at Heathrow IRC), eight were open for 5 to 10 days, three were open for 10 to 15 days, and one was open for 21 days.

IMBs have observed, more positively, that once an age dispute is initiated, individuals are promptly provided with single accommodation away from the general detained population and, once assessed as children, they are released to the care of social services. Nonetheless, the management of an age dispute initiated ahead of the 2 April 2026 removal charter flight to Paris under Operation Hillmore raises questions, as despite the dispute having been raised, the young person's transport to the airport was still instigated. Their removal was stayed at the last moment.

### ***Vulnerability levels and safeguarding failures***

IMBs have observed heightened needs and vulnerabilities more broadly among those detained under Operation Hillmore, most of whom are asylum seekers and are therefore likely to have experienced trauma. Given the high level of specific needs among recent maritime arrivals, Boards have concerns about the reliance on systems that are primarily designed for intake into IRCs from the community and the custodial estate. Many of those who have recently arrived present as psychologically distressed, and Boards have observed records and heard testimonies showing that many are survivors of torture and abuse. A higher proportion of individuals collected for returns under Operation Hillmore are listed as adults at risk or flagged as at risk of suicide or self-harm, compared to other flights monitored by the CFMT.

Given the extremely vulnerable profiles found in this group, the IMB has concerns about other safeguarding mechanisms in addition to the age assessment process, namely the effective functioning of the Detention Gatekeeper, medical screenings (Rules 34 and 35), and ACDT procedures.

Our confidence in the quality of initial screenings conducted at Manston remains low. For instance, Gatwick IRC recently received one individual from Manston with tuberculosis, whilst a second was refused admission to Brook House because of the critical state of their health, and referred directly to hospital by the screening nurse. Boards are also yet to see improvements in the transfer of medical records from Manston to IRCs.

Boards are still observing a backlog of Rule 35 health assessments yet to be conducted (over 100 at Heathrow and 125 at Gatwick in April – May 2026), despite the extra resources allocated, and remain concerned about the lack of preparation that was made to manage such predictably high levels of vulnerability in detention. The IMB is also concerned that only 63 of the 617 Rule 35 reports among the Operation Hillmore cohort resulted in release between August 2025 and mid-April 2026.

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<sup>2</sup> *Age-disputed children detained under the 'one-in-one-out' scheme: Briefing note*, Jesuit Refugee Service and Humans for Rights Network, May 2026, available at: <https://static1.squarespace.com/static/5a69d94949fc2bad10754433/t/6a16c8dc05cb23342faa809b/1779878108950/Briefing+on+age+disputed+minors.pdf>.

## ***Access to information***

Recent arrivals typically have lower levels of English compared to other detained people who have spent at least some time in the UK. Similarly, they are less likely to be familiar with navigating the British legal system and are often disoriented. Boards have spoken to many individuals who were confused about their situation, and have struggled to understand the complex legal language contained in the documents they receive, and what is happening to them or why. Difficulties in understanding the rationale for detention and the processes involved are heightened by the opaque selection criteria for the pilot, especially given that individuals may be separated from family members with whom they have travelled, which has a particularly damaging impact. Ultimately, the lack of accessible information drives anxiety.

IMBs have observed weak use of interpretation in IRCs for everyday activities, and few documents being provided in translation. Whilst some multilingual leaflets are issued upon arrival, there is no pre-removal equivalent, which compounds people's distress and confusion. The insufficient use of interpreters during collections, and difficulties accessing Big Word when needed in the small hours, also hamper communication.

The CFMT has also highlighted the difficulties individuals face in speaking with the Chief Immigration Officer on return flights to Paris, which are short in duration. The Home Office has labelled this an 'imponderable problem', indicating the difficulties in finding a meaningful solution.

## ***Legal advice***

Legal support is generally patchy within detention, with few detained people able to get through to a solicitor. Those that are successful receive advice of variable quality, and these challenges are exacerbated by language barriers. The Hillmore cohort's particular unfamiliarity with the UK legal system heightens the requirement for quality legal support and guidance.

Hillmore processing times are rapid, with a seven-day time period given for response to the initial letter issued informing people of their removal to France. In this short time, substantive conversations with lawyers are often not possible. As a result, individuals are routinely detained and deported without legal representation or assistance. For example, on 1 April 2026 the wait time at Yarl's Wood for a legal appointment under the Detained Duty Advice Scheme stood at 10 days. Whilst this has since decreased with the provision of additional surgeries, the IMB continues to have concerns about the quality of the advice on offer. Boards have described it as perfunctory, and note that people rarely receive written or translated information from lawyers.

At Heathrow, detained people were described by the Board as 'too scared to fill in the form' because of the lack of guidance received, subsequently missing opportunities to submit a bail application. On one Board visit at the end of March, none of those subject to age disputes had a solicitor. Despite assurances that extensions are possible if people have not been able to speak with a lawyer prior to the seven-day deadline, the IMB has concerns as to whether this is known and understood, and requests that the Home Office take concrete measures to address this issue.

## ***Length of detention***

Stays in detention under this pilot scheme have been unduly lengthy, despite numerous individuals ultimately being bailed or given unconditional release. Whilst the average was 54 days, which is already higher than national averages for those not detained under Operation Hillmore, by late February, 79 men at Gatwick under Operation Hillmore had been detained for over 60 days, and one man had spent over 27 weeks in detention. This is despite the stated aims of the Agreement

for case turnaround times, which foresees 14 days for submission of readmission requests to France, and corresponding 14-day response times from France, extendable 'up to a maximum of 28 days in exceptional cases.'<sup>3</sup> Boards are concerned that more individuals are coming into detention under the Operation than are going out.

Moreover, individuals are detained before it is known whether their case will be accepted for readmission by France. As such, the legitimacy of their detention (a realistic possibility of removal within a reasonable time period) is questionable. Explanations provided by the Home Office suggest that a sizeable number of people are being kept in detention for operational convenience, in order for there to be enough individuals readily available for return to France: on a weekly basis they 'need to have 150 coming into detention to manage attrition and legal challenge' by making sure there are 'sufficient people in detention' for the UK – France Agreement.

### **Use of force**

Inconsistencies have been noted by the CFMT in the application of Waist Restraint Belts (WRBs) on multiple Operation Hillmore flights. Some escorts apply WRBs as soon as someone states that they do not wish to be returned to France, even when no physical resistance has been displayed, whereas others use open lines of communication and de-escalation techniques where needed.

The IMB's concerns about the use of force on charter flights generally (primarily the over-use of handcuffing and WRBs, as laid out in our 2025 report *By force of habit: How the use of force in immigration detention has lost sight of necessity and dignity*) are equally applicable to Operation Hillmore.<sup>4</sup>

Finally, I wish to note that we have been here before: the situation calls to mind the Home Office's accelerated charter removals under the Dublin Convention towards the end of 2020, in anticipation of the UK's departure from the European Union and hence the Dublin Convention. We consider this to be comparable. The impact on people detained under that programme was serious and substantial: at the time, the IMB at Brook House IRC found that this programme resulted in inhumane conditions for the entire population detained there.<sup>5</sup> The Board also flagged a sharp increase in serious incidents of self-harm and suicidal ideation, which was directly linked to the intensive programme of Dublin Convention charter flights. The IMB is therefore deeply concerned as to the potential impact of accelerating Operation Hillmore flights.

We hope that officials will continue to work to resolve our concerns, as we are pleased to acknowledge has been the case at Yarl's Wood with the increase in the number of legal surgeries, for instance. We hope that the IMB's broader concerns will be taken into account in any assessment of Operation Hillmore that is carried out. We would be glad to provide more detail if necessary, and contribute to such an assessment. We would also be grateful to receive updates regarding the implementation of Operation Hillmore, including data on legal challenges (decisions to detain and return to France that have been overturned), numbers returned compared to those

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<sup>3</sup> *Agreement between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the French Republic on the Prevention of Dangerous Journeys*, Treaty Series No. 39 (2025), Article 8 (Time Limits for Readmission), July 2025, available at: [https://assets.publishing.service.gov.uk/media/68935e1d303b0dad411d4e83/TS\\_39.2025\\_France\\_Dangerous\\_Journeys\\_Agreement.pdf](https://assets.publishing.service.gov.uk/media/68935e1d303b0dad411d4e83/TS_39.2025_France_Dangerous_Journeys_Agreement.pdf).

<sup>4</sup> *By force of habit: How the use of force in immigration detention has lost sight of necessity and dignity*, IMB, 2025, available at: <https://cdn.websitebuilder.service.justice.gov.uk/uploads/sites/13/2025/11/By-force-of-habit-How-the-use-of-force-in-immigration-detention-has-lost-sight-of-necessity-and-dignity.pdf>.

<sup>5</sup> *Annual Report of the Independent Monitoring Board at Brook House IRC*, 2020, available at: <https://cdn.websitebuilder.service.justice.gov.uk/uploads/sites/13/2022/10/Brook-House-AR-2020-for-circulation.pdf>.

released, the outcome of safeguarding processes (age and health assessments) and delays to these procedures, and vulnerability statistics.

Having alerted you to the seriousness of the IMB's concerns, I look forward to learning of measures undertaken to address these, and I remain available for any clarifications needed.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jane Leech', with a horizontal line underneath.

**Jane Leech MBE**

Interim National Chair, Independent Monitoring Boards