

Concern No	Concern Type	Concern Description	Border Force acceptance of concern	Progress against concern	Response Action Taken / Planned	Responsible Owner	Expected completion date
1	Priority	Leaders were not making sure good practice was consistent across all sites. This covered areas such as identifying and managing risks, induction, treatment of children, use of force and searching.	Accepted	Concern addressed; now in continuous improvement	<p>Action taken:</p> <ul style="list-style-type: none"> •Border Force has existing in-depth guidance and processes in place to ensure a continued and consistent approach across all sites. •An established stepped assurance process is in place (from Line manager up to Senior Leadership) to assure best practice adoption for the areas identified. •The process has been further enhanced via the development and implementation of additional risk assessed assurance measures which includes national oversight and engagement visits to all Border Force directly managed Short Term Holding Facilities (STHFs) throughout the year in response to identified risk, patterns and trends. <p>Planned:</p> <ul style="list-style-type: none"> •Border Force will review its approach to engagement visits to all Border Force-led STHF, focusing on good practice, leaders' roles, and assurance processes • Risks, issues and examples of good practise will be highlighted, discussed and escalated through appropriate forums, regional contacts and Senior Leadership. •Further developmental opportunities for leaders (including overview and visit to IRCs, litigation claims, detained casework training). 	Home Office – Border Force – National Operational HQ, Operations and Safeguarding & Modern Slavery Team	Mar-24
2	Priority	Data were not being collected reliably enough or used to identify trends so action could be taken.	Accepted	Concern addressed; now in continuous improvement	<p>Action taken:</p> <ul style="list-style-type: none"> •Border Force collect a range of data on detention including bio-data, time & length of detention, location, vulnerabilities / risks. •Monthly returns process is established and data is collated, and provided to stakeholders (including IMB). <p>Planned:</p> <ul style="list-style-type: none"> •Border Force is currently participating in the development of a number of digital solutions relating to detention information to improve and enhance accurate data collection and analysis. •Border Force will review requirements for strategic/practitioner working group to work in conjunction with its established casework forum to expand the continual dialogue in identifying trends, issues, risks and meaningful analysis improvements, with primary and continued focus on reducing length of BF detention. 	Home Office – Border Force – National Operational HQ	Mar-24
3	Priority	Not all detainees with potential vulnerabilities were being identified, and information about their vulnerabilities was not always clearly noted in case files.	Accepted	Concern addressed; now in continuous improvement	<p>Action taken:</p> <ul style="list-style-type: none"> •Border Force identifies and captures vulnerabilities as part of the induction process. Guidance clearly states that this is to be noted on case files. •Vulnerability is business as usual and specialist safeguarding expertise is available. •Specialist safeguarding officers are available to assist as required <p>Planned:</p> <ul style="list-style-type: none"> •Border Force is continuing the roll out of a national training programme which is aimed at upskilling officers and managers, whilst increasing the number of frontline specialist safeguarding officers. •Border Force and the Safeguarding & Modern Slavery Team will support the work moving to paperless case files and the electronic capture of vulnerabilities. 	Home Office – Border Force – National Operational HQ, Operations and Safeguarding & Modern Slavery Team	Nov-23

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4	Priority	The Port of Felixstowe remained a poor holding facility. No plan had been confirmed for the refurbishment of the site.	Accepted	In progress	Action taken: <ul style="list-style-type: none"> • Border Force has written to the port authority at Felixstowe to confirm their responsibility to provide (including fund) a suitable detention space (STHF). • The port authority have been provided with a copy of the national holding room standards to aid with the design and technical planning Planned: <ul style="list-style-type: none"> • Border Force will continue positively engaging with the port authority to progress plans and subsequent building of a new STHF facility • Due diligence for the project will be overseen by Ministry of Justice (MoJ) and contractors on behalf of Border Force, with local and national engagement throughout the process • Whilst the new facilities are being progressed, maintenance and improvements (where viably possible) will continue to be made on the existing facilities. 	Home Office – Border Force – Central Region	Oct-24
5	Key	Not all Border Force staff who came into contact with detainees, including minors, had undergone a Disclosure and Barring Service security check.	Not accepted	N/A	<p>Home Office policy states that all staff must hold a minimum of CTC security clearance before taking up a post. CTC checks include a criminal record check of the employee for both spent and unspent convictions as part of national security vetting, which is equivalent to a standard DBS check.</p> <p>All Border Force officers hold Security Clearance (SC level), which is more stringent than CTC.</p> <p>Specialist SAMS officers are required to have enhanced DBS checks. Other officers are not routinely enhanced DBS checked.</p>	N/A	N/A
6	Key	Not all use of force was recorded.	Partially accepted	Concern addressed; now in continuous improvement	Action taken: <ul style="list-style-type: none"> • Border Force officers record Use of Force (UoF) in personally issued notebooks and on a digital database. Planned: <ul style="list-style-type: none"> • Border Force will update the UoF guidance to inform Border Force officers of the Annual Data Requirement (ADR) • Initial work is underway to design an electronic notebook which will include the recording of any UoF. 	Home Office – Border Force – National Operational HQ and Health, Safety and Wellbeing Team	Jan-24

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7	Key	There was a lack of formal well-documented care planning for detainees identified as vulnerable, which could have contributed to their vulnerability. They included detainees with protected characteristics, for example women and those with disabilities or serious health conditions.	Partially accepted	Concern addressed; now in continuous improvement	<ul style="list-style-type: none"> • Border Force accept need for an individual plan rather than a formal care plan to capture initial needs whilst a detained person is in a BF-run STHF. <p>Action taken:</p> <ul style="list-style-type: none"> • Border Force captures vulnerabilities and protected characteristics within the induction process and included on forms. • Vulnerable adults and children are reviewed every two hours and observations recorded. • Vulnerability is business as usual and specialist safeguarding expertise is available. <p>Planned:</p> <ul style="list-style-type: none"> • BF will review processes to improve meaningful interaction and where appropriate (for those with protected characteristics and/or vulnerabilities) consider bespoke detention reviews. This will not be a formal care plan, but an tailored individual plan linked to detention reviews. 	Home Office – Border Force – National Operational HQ and Safeguarding & Modern Slavery Team	Dec-23
8	Key	Unaccompanied children were held for too long and for over two hours longer on average than adult detainees.	Partially accepted	Concern addressed; now in continuous improvement	<ul style="list-style-type: none"> • Published Home Office detention policy is clear that any detention involving children must be for as short a period as possible. • The best interests of the child is an overriding consideration. • The best interests of the child are frequently driven by the complexity of safeguarding checks. <p>Action taken:</p> <ul style="list-style-type: none"> • Border Force always prioritise children. • Independent Monitoring Boards and the Independent Family Returns Panel oversee the review of detention of child cases. <p>Planned:</p> <ul style="list-style-type: none"> • Using existing safeguarding governance and frameworks, BF will continue to refer and/or escalate any issues or concerns through engagement with local authority services. • Issues or concerns are escalated via safeguarding governance and frameworks to the SACC and IFRP 	Home Office – Border Force – Safeguarding & Modern Slavery Team	N/A
9	Key	Safeguarding processes were not sufficiently robust, which meant children who were vulnerable to modern slavery might not have been identified.	Not accepted	N/A	<ul style="list-style-type: none"> • Border Force is one of 18 designated first responders. • Border Force discharges its first responder duties in collaboration with other partners, including Children's Services to whom children arriving at the Border are handed off. 	Home Office – Border Force – National Operational HQ and Safeguarding & Modern Slavery Team	N/A

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10	Key	Legal advice was not readily available to detainees.	Partially Accepted	Concern addressed; now in continuous improvement	<ul style="list-style-type: none"> Individuals detained under Immigration powers are not subject to PACE. Under Rule 27 (as amended for holding rooms), individuals must be permitted to meet with their legal advisers in confidence. In-person visits are not permitted if the person is detained "in an area of a port which non-travelling members of the public are not permitted to enter" although in such cases the individual may consult with their legal adviser by telephone. <p>Action taken:</p> <ul style="list-style-type: none"> Border Force have signposted, via posters, information regarding access to legal advice. The posters are in English with the supporting referral leaflets available in various languages. The leaflet has a legal support section which has information about contacting the Citizens Advice Bureau. <p>Planned:</p> <ul style="list-style-type: none"> Border Force will formally review to ensure that information is correctly signposted in its directly managed STHF. Leaflets will be made available at each location for detained persons. 	Home Office – Border Force – National Operational HQ	Jul-23
11	Key	Not all facilities had showers.	Not accepted	N/A	<ul style="list-style-type: none"> Rule 18 (1a) for STHFs only requires the provision of toiletries for personal health and cleanliness, if required. Toiletries are provided in all BF-run STHF. Subsections 1(b) (provision of daily bath/shower) and 1(c) (daily shave) for STHFs only apply to detention in residential STHFs. Where infrastructure allows, any new or replacement facilities will consider installing showers. 	N/A	N/A
12	Key	Detainees did not have sufficient activities to keep themselves occupied. They could not exercise outside, and children's toys were limited.	Partially accepted	Concern addressed; now in continuous improvement	<ul style="list-style-type: none"> Security and safety concerns at air and sea ports limit the opportunities to provide exercise outside. <p>Action taken:</p> <ul style="list-style-type: none"> Activities are available for young children and there is access to televisions, DVDs and/or books in various languages. <p>Planned:</p> <ul style="list-style-type: none"> Border Force will in conjunction with Immigration Enforcement colleagues develop suitable activities for older children, alongside activities for all detained individuals. 	Home Office – Border Force – National Operational HQ	Mar-24

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13	Key	Not all detainees had access to the complaints process and complaint forms were only in English.	Accepted	Concern addressed; now in continuous improvement	Action taken: •Border Force complaints leaflets have been updated and are available in a variety of languages. Master copies are held in a central repository for printing locally. Planned: •Checks will be made during engagement visits to ensure updated complaints leaflets are available to detained persons	Home Office – Border Force – National Operational HQ	Aug-23