

## ACTION PLAN HMIP REPORT ON BF MANAGED STHFs 2026

|   | Concern Addressed By | HMIP Concern                                                                                                                                                                                                                                        | Home Office Response to HMIP Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Expected completion |
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| 1 | Home Office          | <p><b>Priority concern</b></p> <p><b>Safeguarding processes were not sufficiently robust.</b> Some officers, including those trained as specialists in safeguarding and modern slavery, did not properly assess significant risks to detainees.</p> | <p><b>Partially Accepted</b></p> <p>Every Border Force officer has a duty to consider vulnerability and potential safeguarding needs when performing their role. Border Force acknowledges HMIP's concern and accepts that more can be done to support officers with the training and guidance to this. However, only those Short-Term Holding Facilities (STHFs) directly managed by Border Force were in scope for this inspection. As such, the data and cases reviewed do not fully reflect the entirety of the Border Force's detention estate/function (i.e. to include those managed by MITIE).</p> <p><b>Action Taken</b></p> <p>The Border Force National Safeguarding and Modern Slavery (SAMS) team delivers three "Protecting the Vulnerable" (PTV) training packages, structured around the safeguarding pathway: recognise, respond, refer, and record.</p> <ul style="list-style-type: none"> <li>PTV/S (Specialist): a three-day course for safeguarding specialists, focused on identifying risk, recognising indicators of vulnerability and trafficking, and providing appropriate advice and support.</li> <li>PTV/M (Managers): a mandatory one-day course for managers, covering safeguarding decision-making, oversight, and supporting frontline staff with complex or sensitive cases.</li> <li>PTV/O (Officers): a mandatory half-day course for frontline officers, providing core awareness of vulnerability and equipping staff to respond appropriately and refer cases.</li> </ul> <p>National SAMS share updated guidance through multiple channels, including a dedicated SharePoint site, regular communications, monthly network meetings, and a quarterly Operational Delivery Group. Guidance is also accessible to officers on mobile devices via the Ocelot Safeguarding and Modern Slavery pages.</p> <p>Within each Border Force region, safeguarding activity is coordinated, monitored, and developed locally. Regional SAMS leads work with specialist officers at all ports to support them in recognising, responding to, referring, and recording safeguarding and modern slavery concerns.</p> <p><b>Action proposed</b></p> <p>National SAMS have a nationally agreed target, endorsed by senior leadership, to achieve 90% completion of the PTV training packages across all officers by the end of 2027.</p> <p>Regional SAMS leads will continue to drive standards, maintain capability, and ensure skills remain current for trained SAMS officers. In particular, those officers whose opportunities to apply their learning are limited, i.e. at ports with the lowest passenger volumes.</p> | December 2027       |

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| 2 | Home Office          | <p><b>Priority concern</b></p> <p><b>The overall length of detention had increased, and many people were held in controlled waiting areas (see Glossary) without access to the facilities of a holding room, sometimes without relevant detention paperwork being served.</b></p> <p>Leaders had inadequate oversight of these issues, and there was no collation or analysis of relevant data.</p> | <p><b>Partially Accepted</b></p> <p>Border Force acknowledge the increased detention lengths and concerns regarding extended use of controlled waiting areas (CWAs), alongside gaps in data collation and analysis. However, the increased detention lengths were largely driven by specific high-volume events, particularly at Harwich and Felixstowe, and is not indicative of a systemic issue. Excluding these events, detention lengths remain broadly consistent with previous reporting.</p> <p>While isolated issues have been identified at some locations, including extended CWA use, these are being addressed. Border Force does not accept that oversight is inadequate; leadership focus and monitoring of detention activity have strengthened over the period.</p> <p><b>Action Taken</b></p> <p>Border Force always aims to keep length of detention to the shortest time possible, prioritising children and vulnerable individuals. In January a new process, focussing specifically on review of each detained person’s welfare and case progression, was added to the Immigration Detention Records (IDR) referenced in this report.</p> <p>Work is taking place across the Home Office to improve future data quality and usage. Border Force is working with Home Office’s Migration and Borders and Data Capability Team to identify more effective methods for collecting and analysing reliable data.</p> <p>Border Force accept that in the case of high-volume events detention times can increase. Work to assess the feasibility of reducing the paperwork and administrative burden in these cases, whilst ensuring no detrimental impact on safeguarding vulnerable individuals, is ongoing.</p> <p><b>Action proposed</b></p> <p>Border Force will introduce ‘Detention at the Border guidance’, which aims to update existing CWA and Short-Term Holding Facilities (STHF) guidance and combine into one document. This will deliver national consistency, clearer detention processes, and better management of detention risks.</p> <p>Border Force will increase the reliability, visibility and use of detention data, introducing an interim solution for accurate data collection, analysis and trend identification by the end of this year.</p> | December 2027       |

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| 3 | Home Office          | <p><b>Priority concern</b></p> <p><b>The Port of Felixstowe remained a poor facility and there was still no timeline for its replacement.</b></p>                                                                                   | <p><b>Partially Accepted</b></p> <p>Whilst Border Force accepts improvements to Felixstowe STHF are necessary, it cannot commit to providing a timeline for the completion of any proposed improvements. The provision of certain immigration facilities at designated ports is a statutory requirement required of port authorities, commonly referred to as TPF (Trader Provided Free) facilities. Whilst Border Force is committed to working with port authorities to meet required standards for border infrastructure and facilities, port infrastructures are complex, and Border Force is dependent on port operators taking forward improvement works. As such, this recommendation has been partially accepted.</p> <p><b>Action Taken</b></p> <p>Border Force has been proactive and persistent in addressing the shortcomings at the Port of Felixstowe. The team worked closely with the port operator to identify and design a new purpose-built facility; this was progressed towards a December 2024 start date.</p> <p>Following a port ownership change, the new port operator reviewed the current designs and decided not to proceed with the existing plan. At a senior level, Border Force are proactively escalating concerns and secured a meeting with the new owners. As a result, the operator has now offered an alternative option and location within the port site. They are currently reviewing costs and drawing up detailed plans. Although significant port infrastructure work will be required to bring this up to required standards, the change in approach reflects continued positive engagement, ensuring progress is maintained despite the ownership changes.</p> <p>In the interim, Border Force has mitigated risk operationally. Procedures are in place to only use the existing facility at Felixstowe for triage purposes, with detained persons promptly moved to Harwich for continued detention, safe processing and continued case working activity, where appropriate.</p> <p><b>Action proposed</b></p> <p>Border Force seniors will continue to prioritise advancing improvements with Felixstowe's port operator, however an implementation date cannot be provided at this time.</p> | See Response        |
| 4 | Home Office          | <p><b>Priority concern</b></p> <p><b>Detainees were still not allowed access to their prescribed medication, which created significant health risks. There was no formal health provision at any of the holding facilities.</b></p> | <p><b>Partial Accepted</b></p> <p>A review of access to medication is currently ongoing. As part of that work, consideration will be given to what, if any, medication detained persons can access. As such Border Force cannot agree in full to allowing access to any medication they might hold.</p> <p>This activity is being explored in conjunction with wider Home Office law enforcement partners to ensure consistency and alignment across detention settings. Engagement with policy, legal and operational stakeholders is continuing, alongside initial commercial preparatory activity to inform possible future engagement with the market. Any progression beyond this exploratory stage remains subject to governance, approvals and wider departmental decisions.</p> <p><b>Action Taken</b></p> <p>Staff continue to follow current instructions. For ports without access to Aeromed, these include following local procedures to contact a medical practitioner/paramedic. At a minimum this includes the option to call for assistance on 111 (and 999 for emergencies).</p> <p><b>Action proposed</b></p> <p>BF continues to explore jointly with Immigration Enforcement, options for detained persons to safely access medication for the short period of time individuals are detained in STHFs at ports with an expected lead in time of up to 24 months.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | October 2028        |

## ACTION PLAN HMIP REPORT ON BF MANAGED STHFs 2026

|   | Concern Addressed By | HMIP Concern                                                                                                                                                                                                                     | Home Office Response to HMIP Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Expected completion |
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| 5 | Home Office          | <p><b>Key Concern</b></p> <p><b>Border Force staff under-recorded the use of force.</b> Paperwork to justify the use of handcuffs was often not completed, and some compliant detainees were held in handcuffs for too long.</p> | <p><b>Partially Accepted</b></p> <p>Only those Short-Term Holding Facilities (STHFs) directly managed by Border Force were in scope for this inspection. As such, the data and cases reviewed do not fully reflect the entirety of the Border Force's detention estate/function (i.e. to include those managed by MITIE) and are not indicative of a systemic issue.</p> <p>National Guidance clearly sets out that any use of force must be necessary, proportionate, lawful and accountable. It must also be fully recorded so that managers can assure themselves that force has been used appropriately, that any learning is identified, and that staff and detained people are protected.</p> <p><b>Action Taken</b></p> <p>Border Force monitor compliance through local, regional, first line and second line assurance activity. This assurance is used to identify gaps in recording, confirm that the rationale for handcuffing is documented, and take corrective action where standards are not met.</p> <p>While existing arrangements currently provide supervisory oversight, Border Force's regional assurance teams recognise the need for enhanced assurance in light of HMIP's concern and further action is being taken to address the risk of non-recording.</p> <p><b>Action proposed</b></p> <p>Regional assurance teams will strengthen dip-sampling and cross-check detention records, Home Office data, officers' notebooks and assurance returns to identify cases where force may have been used but not recorded.</p> <p>First line assurance teams will reinforce the HMIPs findings with regions and require them to test whether compliant handcuffing is being missed through activity such as observation, staff engagement and process walkthroughs.</p> <p>Second line assurance will continue to examine use of force records during port spot checks, including digital records and officers' notebooks, to assess whether force was proportionate, legal, accountable and necessary. Where shortfalls are identified, assurance leads will work with ports to make sure lessons are learned and any training gaps are addressed.</p> | November 2026       |
| 6 | Home Office          | <p><b>Key Concern</b></p> <p><b>Care plans were often not completed when needed for both adults and children.</b></p>                                                                                                            | <p><b>Accepted</b></p> <p>The Home Office accept this concern which is being addressed through a series of improvements to Border Force processes.</p> <p><b>Action Taken</b></p> <p>A new suite of Immigration Detention Records (IDR) has been introduced to capture risks, vulnerabilities and all interactions with detained individuals, supporting more consistent care planning.</p> <p>Following a pilot from August 2025 and feedback from Internal Monitoring Board (IMB) Board Chairs, the IDR system was fully embedded as business as usual across all BF managed Short-Term Holding Facilities (STHFs) in January 2026.</p> <p>The current Adults at Risk policy is under review with a view to further strengthen the safeguards and care planning requirements in place for vulnerable individuals.</p> <p><b>Action proposed</b></p> <p>Further roll-out of the IDR system to contractor-operated STHFs is scheduled September 2026 to ensure consistency across the estate.</p> <p>'Assessing Detention for Vulnerable People', which will replace the Adults at Risk policy, is complete and with Ministers for final consideration. Border Force will introduce this in all locations once it is agreed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | November 2026       |

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| 7 | Home Office          | <p><b>Key Concern</b></p> <p><b>Detainees did not have easy access to the complaints process.</b> They were not routinely given complaint forms, and some staff were unaware that forms were available in different languages. Complaint boxes were frequently located outside the holding room.</p>                | <p><b>Accepted</b></p> <p>All passengers, including those held in Short-Term Holding Facilities (STHFs), have access to the complaints/compliments process. Every person inducted into a Border Force managed STHF is expected to receive the information laid out in the detainee information sheet. This includes details of how they can raise a complaint with a member of staff or in writing. However, Border Force accepts HMIP's concerns regarding the consistency of these expectations being met in some instances.</p> <p><b>Action Taken</b></p> <p>All STHFs have complaints/compliments boxes with writing materials, translated into 34 languages. Additional forms are readily accessible from Border Force Immigration Detention and Customs Custody (IDCC) team's SharePoint for colleagues to print.</p> <p>Instructions have been clearly communicated to all staff on how to handle complaints, and posters and translated materials are displayed across all Border Force managed STHFs. To support consistent implementation, Border Force's IDCC team monitor compliance during engagement visits.</p> <p><b>Action proposed</b></p> <p>Border Force IDCC will ensure the incorrect poster highlighted in the report is not displayed in any Border Force managed STHFs. The feasibility of having all complaints/compliments boxes situated within the holding room will also be explored.</p> <p>The Border Force Operational Assurance Directorate (OAD) will utilise the Assurance Review Team (ART) to conduct regular focussed second line assurance checks on both staff knowledge and processes being followed in line with guidance. These checks will form part of a report that will inform port senior leaders on findings and recommendations for improvements. Future revisits will further support the drive to ensure these recommendations have been embedded within the STHFs.</p> <p>OAD will also utilise existing structures, such as the BF National Complaints Forum, to raise awareness of this concern with operational colleagues. This will enable signposting to the availability of forms and process guidance. The forum will provide the means for a closed feedback loop to address this concern, and any issues raised through first and second line assurance.</p> | January 2027        |
| 8 | Home Office          | <p><b>Key Concern</b></p> <p><b>The range and quality of clothing provided to people leaving the short-term holding facilities were too limited.</b> Many detainees arrived with few clothes. The only underwear and slippers they could obtain were flimsy disposable items, and no facilities provided coats.</p> | <p><b>Not Accepted</b></p> <p>While Border Force acknowledge the concern regarding the range and quality of clothing available to individuals leaving Short-Term Holding Facilities (STHFs), it is important to clarify the purpose and scope of current provisions.</p> <p>STHFs are designed for very short periods of detention rather than longer-term accommodation. As such, the clothing provided is intended to meet immediate, temporary needs, ensuring individuals maintain basic comfort, dignity, and warmth during their time in the facility and at the point of departure.</p> <p>The provision of items such as disposable underwear and footwear reflects a hygienic, practical, and proportionate approach, allowing facilities to respond quickly to individuals who may arrive without essential items. These items are not intended to serve as long-term replacements but rather to address immediate welfare needs.</p> <p>Similarly, while coats are not routinely issued, facilities take steps to ensure individuals are adequately protected from prevailing conditions at the point of release or transfer, with decisions made on a case-by-case basis where necessary. The overall approach is designed to balance welfare considerations with the short-term nature of detention, operational practicality, and responsible use of public resources.</p> <p>We remain committed to keeping these provisions under review to ensure they continue to meet the core objective of maintaining immediate comfort, dignity, and warmth, while aligning with the intended function of STHFs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N/A                 |