Report on the unannounced inspection of the short-term holding facility at:

Birmingham International Airport

20 April 2010 by HM Chief Inspector of Prisons

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Overview

The holding room was managed on behalf of the UK Border Agency (UKBA) by Group 4 Securicor (G4S) and staffed by a permanent team of eight detainee custody officers (DCOs), two of whom were on duty at any one time. The facility was open 24 hours a day, seven days a week, and held men, women and children.

At the time of the inspection, there were no flights, due to the closure of British air space following concerns about volcanic ash. As a result, only one detainee, who had returned for interview, was present in the holding rooms at the time of the inspection.

The contractor supplied copy logs for the three months from January to March 2010, a period of 90 operational days. During this time, the holding room had been occupied on 77 days, by a total of 172 people, including 47 (27.3%) women and seven (4%) children. The average length of detention was 8.65 hours, ranging from 10 minutes to 43 hours. The children had been held for between two hours and 50 minutes and 21 hours.

Most detainees were arriving passengers and were either removed on a return flight or admitted to the country, either temporarily or unconditionally. A small number had been brought to the airport for removal on a flight and some had returned to the airport for interview after previously being admitted temporarily.

Birmingham Airport Short-Term Holding Facility Inspected: 20 April 2010 Last inspected: 6 August 2008

Inspectors

Colin Carroll Lucy Young

The healthy custodial establishment

HE.1 The concept of a healthy prison was introduced in our thematic review *Suicide is Everyone's Concern* (1999). The healthy prison criteria have been modified to fit the inspection of short-term holding facilities, both residential and non-residential. The criteria for short-term holding facilities are:

Safety – detainees are held in safety and with due regard to the insecurity of their position

Respect – detainees are treated with respect for their human dignity and the circumstances of their detention

Activities - detainees are able to be occupied while they are in detention

Preparation for release – detainees are able to keep in contact with the outside world and are prepared for their release, transfer or removal.

HE.2 Inspectors kept fully in mind that although these were custodial facilities, detainees were not held because they had been charged with a criminal offence and had not been detained through normal judicial processes.

Safety

- **HE.3** There was some evidence of detainees waiting long periods for transfer to residential holding facilities or removal centres. All detainees were routinely handcuffed when being escorted through unsecured public areas of the airport, without specific information to indicate a risk of escape or harm.
- **HE.4** There had been no recorded incidents of bullying or self-harm in the previous 12 months. Detainee custody officers (DCOs) had not had refresher training in preventing bullying or suicide and self-harm and did not carry anti-ligature knives.
- **HE.5** Some detainees were placed in the holding room before the issue of the IS91 authority to detain and the IS91R reasons for detention.
- HE.6 Immigration staff had all received child protection training and had links with local social services. The airport chaplain was able to act as an appropriate adult. The contractor, Group 4 Securicor (G4S), had a child protection policy, including a flow chart indicating what action to take in the event of any child protection concerns. DCOs had not been given any training in safeguarding children.
- HE.7 All DCOs had received training in control and restraint techniques but indicated that they would only use force as a last resort. There had been no recorded incidents in the 12 months before the inspection.
- **HE.8** Independent Monitoring Board members had started to make regular visits to the holding rooms in April 2010. UKBA staff provided regular oversight.

Respect

- **HE.9** The holding rooms were adequately equipped to hold detainees for short periods but were unsuitable for the long periods of detention. Many detainees experienced long stays, although there were no sleeping facilities and no showers.
- **HE.10** Staff were polite and appeared sensitive to the needs of detainees. Detainees were able to practice their religion but DCOs had not been given any training in diversity issues.
- HE.11 A selection of drinks and hot meals was available to suit most diets. Complaint forms were freely available but the system of immigration staff emptying the locked complaints boxes had failed, leaving a complaint uncollected for over four weeks.

Activities

HE.12 There was a television in one of the holding rooms and detainees had access to a range of reading material in different languages. There were toys, books, activity packs and DVDs available to entertain children.

Preparation for release

HE.13 Small information cards giving the address and contact details of immigration removal centres were given to detainees being transferred into further detention. Detainees had good access to telephones but not to email or faxes.

Section 1

Escort vans and transfers

Expected outcomes:

Detainees under escort are treated courteously, provided with refreshment and comfort breaks, and transported safely

- 1.1 During the inspection, there were no transfers of detainees and we did not examine any escort vehicles. Detainees from other ports were escorted to and from the holding room through the airport arrivals area to vehicles parked outside the airport. Detainee custody officers (DCOs) told us that all adult detainees being escorted through the airport's unsecured public areas were handcuffed in accordance with the standing instructions agreed between the UK Border Agency (UKBA) and the contractor, Group 4 Securicor (G4S). On each occasion that handcuffs were used, DCOs were required to complete a 'passive handcuff report' form. Between 14 January 2010 and 27 April 2010, 19 men and four women had been placed in handcuffs. In only two cases had any additional risk factors been noted which might have indicated a raised risk of harm or escape beyond the fact that the detainee was being escorted through an unsecured area. In one case, handcuffs had not been applied, as the detainee had had mobility problems requiring the use of a wheelchair to convey her to the escort vehicle. Detainees being escorted airside to departure gates for removal flights were not routinely handcuffed.
- **1.2** The holding room logs showed that about 18% of detainees held in the previous three months had been transferred to other places of detention. These detainees had often been held for long periods awaiting transport. Some had been held in excess of 20 hours before being transferred, and one detainee had been in the holding room for 37 and a quarter hours before going to Oakington immigration removal centre (IRC).
- **1.3** DCOs confirmed that they informed detainees of their destination as soon as they received confirmation from the Detainee Escorting and Population Management Unit (DEPMU).

Recommendations

- 1.4 Detainees should not be handcuffed unless there is specific information indicating an increased risk of escape or harm to the detainee, staff or the public.
- 1.5 Once a decision has been made to move a detainee to a residential holding facility or removal centre, they should be transferred promptly to avoid long detention in an unsuitable environment.

Arrival and accommodation

Expected outcomes:

Detainees taken into custody are treated with respect, have the correct documentation, and are held in safe and decent conditions. Family accommodation is suitable.

1.6 The facility comprised a small staff/reception area, two holding rooms, two interview rooms and separate male and female toilets. The area was generally clean, although the paintwork in the holding rooms was grubby and in a poor state of decoration.

- **1.7** The main holding room had a glazed wall with a view over the airport, a table and four fixed chairs, and a number of chairs arranged around the edge of the room and secured to the floor. There was a shelf for books, magazines and newspapers and a television. The second holding room had no natural light and contained a number of fixed chairs arranged around the edge of the room and a table on which there was a number of books, magazines and newspapers. The two interview rooms consisted of a table and chairs, which were secured to the floor and mainly used by immigration staff.
- **1.8** On arrival in the holding room, detainees were given a rub-down search. Out of the staff group of eight DCOs, only two were female. If a woman was detained and there were no female DCOs on duty, they were either searched by a female immigration officer or the search was limited to being scanned with a metal detecting wand.
- **1.9** Detainees' property was identified, logged and sealed, but was not searched. Although a locked cupboard was available for storage, detainees' property was normally kept in the staff area.
- **1.10** After being booked in, detainees were offered a drink and shown how to use the drinks vending machine, which offered a range of hot and cold drinks free of charge. They were then shown around the holding area and given a copy of the G4S holding room information booklet, which contained information about detention in a holding room in 11 different languages. Copies of the booklet were also displayed on the walls in the holding rooms.
- 1.11 The men's and women's toilets were both clean, and the women's toilet was equipped with a baby change unit. Nappies and sanitary items were available and were stored in the women's toilet area in a clean plastic container. Additional supplies were available in the staff area. The toilets contained no showering facilities and neither toilet area had a mirror. At the time of the inspection, there were no complete hygiene packs, containing essential toiletries, although a supply was on order. There was no stock of replacement clothing. Most detainees arriving on flights had fresh clothing in their luggage and were given access to their property to obtain a change of clothing on request.
- **1.12** Detainees were not routinely offered a free telephone call on arrival but were given a free call on the staff telephone if they did not have any means. A pay telephone could be used for outgoing and incoming calls. Detainees could retain their mobile telephones (see section on preparation for release).
- **1.13** Detainees were often held for long periods, and overnight. The logs indicated that in the threemonth period before the inspection, 10 detainees had been held for more than 24 hours and a further 16 had been held for over 20 hours, including a two-year-old child. There were no adequate sleeping arrangements: the seating was not suitable for sleeping, or even for being seated, for prolonged periods. A couple of pillows were available with pillow cases, and emergency foil blankets, but no regular blankets. During the three-month period we reviewed, the maximum number of detainees held at any one time was five.
- **1.14** There were no health screening facilities. If detainees had medication that they needed to take during their stay, DCOs could contact a telephone medical advice and triage service, which provided guidance on whether detainees should be allowed access to their medication. If a detainee required medical attention, DCOs told us that they would contact paramedics based at the airport.

- **1.15** There was a good working relationship between immigration and G4S staff. Immigration staff provided oversight of the holding room and conducted routine checks, although DCOs and the log which recorded the routine visits indicated that daily visits did not always take place.
- **1.16** The Independent Monitoring Board had appointed board members to visit the facility in 2008 but their ability to conduct regular visits had been hampered by delays in being issued with airside passes. Passes were eventually received in March and April 2010, and the board began regular visits in April.

Recommendations

- 1.17 The holding room should be repainted and the decoration regularly inspected and maintained when necessary.
- 1.18 The holding room should be staffed by both male and female detainee custody officers (DCOs) at all times.
- 1.19 Detainees' property should be kept in a secure area.
- 1.20 Toilet areas should have mirrors.
- 1.21 Hygiene packs containing essential toiletries and clean towels should be available.
- 1.22 Detainees should not be held for substantial periods or overnight without sufficient sleeping, dining, washing and exercise facilities.
- 1.23 Immigration staff should conduct daily visits to the holding room to check both the facilities and the well-being of any detainees held.

Positive relationships

Expected outcomes:

Those detained are treated respectfully by all staff, who have proper regard for the uncertainty of their situation and their personal circumstances.

- **1.24** There was only one detainee held during the inspection. She indicated that she had been treated well by G4S staff and we observed staff treating her respectfully and checking on her well-being.
- **1.25** DCOs wore their airport identification and said that they always addressed detainees by their first or preferred names. If detainees did not understand English, DCOs said that they asked immigration staff who spoke the detainee's language or interpreters employed by the UKBA to assist them in explaining the facilities to new arrivals. A telephone interpreting service was also available. Staff knew how to use it and invoices indicated that the service had been used on five occasions since January 2010 which appeared low, given the number of detainees passing through.

Legal rights

Expected outcomes:

Detainees are able to obtain expert legal advice and representation from within the facility. They can understand and retain legal documents. They can communicate with legal representatives without difficulty to progress their cases efficiently.

- **1.26** Detainees were allowed to retain their IS91R form, documenting reasons for detention. This document was available only in English, although the reasons for detention were explained verbally using interpretation if necessary. G4S retained the authority to detain (IS91) while detainees were held in the holding room. There was no information in the facility advising detainees of their bail rights. Correct telephone numbers for the Immigration Advisory Service and Refugee Migrant Justice were displayed in the holding rooms. Details of the Community Legal Advice helpline and other local immigration advisers were not displayed.
- **1.27** Detainees were able to contact their legal representatives using mobile telephones or the pay telephone, which could be used for both incoming and outgoing calls. The pay telephone did not have a privacy hood and detainees were unable to make telephone calls in private.
- **1.28** A fax machine was available in the DCOs' office area. Documents to be faxed were shown to an immigration officer, who made a decision on whether to allow the fax. This was despite the fact that communication between a detainee and legal representatives is privileged and should remain confidential.

Recommendations

- 1.29 Staff should use the telephone interpreting service to communicate with detainees who have little or no English.
- 1.30 Written reasons for detention should be provided in a language the detainee can understand at the time of detention.
- 1.31 Details of the community legal advice line should be displayed in the holding rooms.
- 1.32 Detainees being detained further should be provided with bail application forms and written guidance on how to make a bail application.
- 1.33 Detainees should be able to make calls in private.
- 1.34 Detainees should have free access to a fax machine. Notices explaining this should be displayed in the holding room.
- 1.35 Documents being faxed by a detainee should not be disclosed to an immigration officer.

Casework

Expected outcomes: Detention is carried out on the basis of individual reasons that are clearly communicated. Detention is for the minimum period necessary.

- **1.36** DCOs told us that, on occasion, people were held in the holding room for approximately 20 minutes while immigration officers left the area to conduct enquiries and before the written authority for detention (IS91) had been served. This meant that passengers were held unlawfully. The holding room logs confirmed this and showed that detainees were often brought into the holding room on an IS81, which gives an immigration officer authority to question a detainee.
- **1.37** During the inspection, one woman was being supervised by G4S staff while she sat in a UKBA holding room, despite no IS91 having been issued. She had entered the UK a number of days earlier on a US passport and been granted temporary admission. The immigration officer had

called her back to the airport for interview on the day of the inspection. The DCOs accepted her into their custody and were caring for her, and her status at the holding facility was not clear.

1.38 The holding room logs indicated that, out of the 172 detainees held between January and March 2010, 37% had been removed, 18% transferred into further detention and the remaining 45% either landed (given leave to enter) or temporarily admitted.

Recommendations

- 1.39 Detainees should not be held in the detention facility without an IS91 and IS91R.
- 1.40 Those who have complied with the conditions of their temporary admission and returned to the airport for further interview should not be held by DCOs.

Duty of care

Expected outcomes: The centre exercises a duty of care to protect detainees from risk of harm.

Bullying

1.41 DCOs had not been given any refresher training in anti-bullying, although some useful guidance was available in the manual of operating procedures. They told us that they had not witnessed any bullying between detainees at the holding facility, and there were no recorded incidents. As there were two holding rooms, unrelated male and female detainees could be separated to prevent the risk of unwanted attention.

Suicide and self-harm

- 1.42 There had been no recorded incidents of self-harm in the holding room in the previous 12 months. DCOs had not received refresher training in suicide or self-harm prevention. DCOs we spoke to were unaware of the assessment, care in detention and teamwork (ACDT) care planning system used to monitor and care for detainees at risk of suicide or self-harm. Staff said that if there was an incident of self-harm, they would immediately call a paramedic and complete an incident report form. Self-harm incident report forms were monitored centrally by the national G4S office.
- **1.43** The DCOs demonstrated an understanding of how to manage detainees who might be at increased risk of self-harm or suicide. DCOs also said that they would seek the assistance of their managers or immigration staff if they had concerns. They did not carry anti-ligature knives, which could have caused delay in an emergency, but one was attached to the first-aid box. DCOs had all received first-aid training as part of their initial training course and attended refresher training at least every three years.

Recommendations

1.44 Detainee custody officers should receive refresher training in anti-bullying, and suicide and self-harm prevention and be trained in the assessment, care in detention and teamwork (ACDT) care planning system. 1.45 DCOs should carry anti-ligature knives.

Childcare and child protection

Expected outcomes:

Children are detained only in exceptional circumstances and for the minimum time.. Children's rights and needs for care and protection are respected and met in full.

- 1.46 A chief immigration officer led the UKBA children's team at the airport. The team consisted of nine immigration officers, who were Criminal Records Bureau (CRB)-checked to the enhanced level. All immigration officers had undergone the two-day tier two 'Keeping Children Safe' training course, and the children's team lead had undergone the tier three course. The children's team had insufficient capacity to ensure that there was always a member of the team on duty. There were some links with the local safeguarding children board (LSCB). A UKBA officer from the local enforcement unit in Solihull maintained contact with the LSCB and fed back to the airport children's lead. Referrals were usually made to Solihull Social Services, but when entry was granted and the passenger was travelling to a Birmingham address, Birmingham Social Services were contacted. Relationships with Solihull Social Services were described as good. A memorandum of understanding allowed the airport chaplain to act as an appropriate adult. Staff from the UK Human Trafficking Centre had conducted roadshows, which involved the UKBA and other stakeholders from landside. No referrals had been made to the National Referral Mechanism.
- **1.47** G4S had a child protection policy, which was contained in the operating procedures manual. This included a helpful a flow chart indicating what action to take in the event of any child protection concerns, and a copy was displayed in the staff area. All DCOs were CRB-checked to enhanced level, but had not received any specific training on safeguarding children. If an unaccompanied child was held in the facility, a children's care plan was completed, noting the primary carer.
- 1.48 Children's toys, books, magazines and activity packs were available. Several of the children's books were in languages other than English. The holding rooms had been made more child-friendly by placing posters on the walls. A baby change facility was available in the women's toilet. Nappies, baby wipes and sterilised bottles were also available on request. Additional items could be purchased at shops in the airport if required. Children's films and cartoons could be watched on handheld DVD players.

Recommendation

1.49 DCOs should receive training in safeguarding children.

Diversity

Expected outcomes:

There is understanding of the diverse backgrounds of detainees and different cultural norms. Detainees are not discriminated against on the basis of their race, nationality, gender, religion, disability or sexual orientation, and there is positive promotion and understanding of diversity.

1.50 DCOs could not remember training in diversity issues. Detainees were able to make formal complaints about racist incidents by using the UKBA complaints forms (see below). G4S's diversity policy was displayed on the walls of the holding rooms. A DCO told us that if he heard a detainee making racist comments he would only act if the victim complained.

- **1.51** Detainees were able to practise their religion. Bibles, Qur'ans, prayer mats and a compass were located in the G4S office and available on request. Small notices in the holding rooms informed detainees of this. The holding room contained a number of magazines in different languages.
- **1.52** There was no local designated disability officer. If a detainee with a disability was held in the facility, a disability care plan would be completed. Copies were collated by the G4S national disabilities officer. There was a disabled toilet, but it did not have grip rails or a raised seat.

Recommendations

- 1.53 DCOs should receive training in diversity.
- 1.54 Bibles, Qur'ans and prayer mats should be located in the holding rooms.
- 1.55 The disabled toilet should have grip rails and a raised seat.

Activities

Expected outcomes: The facility encourages activities to preserve and promote the mental and physical well being of detainees.

- **1.56** There was a television in the main holding room but not in the second holding room. Both rooms contained a selection of books, magazines and newspapers, in a range of appropriate languages. There was also a chess and backgammon set. There were some activities for children (see section on childcare and child protection).
- **1.57** There was no access to exercise in the fresh air and no smoking area.

Recommendations

- 1.58 There should be a television in both holding rooms.
- 1.59 Detainees held for several hours should have access to exercise in the fresh air.

Facility rules

Expected outcomes:

Detainees are able to feel secure in a predictable and ordered environment.

- **1.60** Neither of the two holding rooms could be seen from the staff area. The holding rooms were not locked and detainees could come out and speak to staff, who checked on them regularly. The area was covered by closed-circuit television, which could be monitored from the staff area but was not recorded.
- **1.61** The DCOs had received training in control and restraint techniques during their initial training course and attended annual refresher courses. They could not recall the last time they had had to use force on a detainee. They indicated that they would always seek to de-escalate any situation by talking to detainees, and would only use force as a last resort. A review of incident reports held centrally indicated that there had been no recorded use of force incidents in the holding room during the previous 12 months.

Recommendation

1.62 Closed-circuit television footage should be recorded and retained.

Complaints

Expected outcomes: There is a published complaints procedure; compliant forms are freely available.

1.63 Complaint forms were available in a range of languages. There were locked complaint boxes in both of the holding rooms. Complaint forms should have been collected by immigration staff during their routine visits to the holding room, sent to the UKBA complaints office in Croydon to be logged, and then sent to the appropriate department for a reply. However, this system was not working effectively and complaints were not dealt with swiftly. One complaint that we found had lain uncollected for over four weeks. Statistics held by G4S indicated that there had been no recorded complaints relating to the holding room during the previous 12 months.

Recommendation

1.64 The complaints boxes should be emptied daily and complaints replied to swiftly.

Services

Expected outcomes:

Services available to detainees allow them to live in a decent environment in which their normal everyday needs are met freely and without discrimination.

1.65 Detainees were offered a meal on arrival, at meal times and at regular intervals during their stay. There was a stock of ambient microwave meals suitable for different dietary requirements, including halal and vegetarian options, but these meals were unappetising. There were no frozen meals. If detainees did not wish to have a microwave meal, DCOs had a supply of petty cash and could purchase sandwiches or fast food locally from within the airport. There was also a stock of snack items, including crisps, cereal bars, dried fruit, fruit juice and cartons of fruit. The refrigerator and microwave oven were both clean and there was a supply of plastic cutlery. There was no food comments or complaints book.

Recommendations

- 1.66 A range of frozen meals should be offered to detainees.
- 1.67 A food comments book should be available.

Preparation for release

Expected outcomes:

Detainees are able to maintain contact with family, friends, support groups, legal representatives and advisers, are given adequate notice of their release, transfer or removal, and are able to recover property. Families with children and others with special needs are not detained without items essential to their welfare.

1.68 Visitors were not allowed to visit detainees, as the facility was located airside. Detainees had unrestricted access to the pay telephone and mobile telephones to maintain contact with

family, friends and their legal advisers. Staff had a supply of petty cash and could offer change for detainees who wished to use the pay telephone; they could also access the currency exchange facilities in the airport. Detainees were allowed to retain mobile telephones that did not have an integral camera or recording facility. Staff had a supply of dummy mobile telephones that detainees with unsuitable phones could use with their own SIM cards.

- **1.69** Detainees being transferred to further detention were given the location and contact details of the IRC on a small card. Only transparent property bags were available to detainees.
- **1.70** Detainees with a laptop computer were allowed to retain and use it in the holding rooms. Those without laptop computers did not have access to email.

Recommendations

- 1.71 Non-transparent property bags should be available to detainees.
- 1.72 Detainees should have access to email.

Section 2: Recommendations and good practice

Recommendations	To the UK Border Agency	
Detainees should not be held for substantial periods or overnight without sufficient sleeping, dining, washing and exercise facilities. (1.22, see paragraph 1.13)		
Immigration staff should conduct daily visits to the holding room to check both the facilities and the well-being of any detainees held. (1.23, see paragraph 1.15)		
Written reasons for detention should be provided in a language the detainee can understand at the time of detention. (1.30, see paragraph 1.26)		
The complaints boxes should be emptied daily and complaints replied to swiftly. (1.64, see paragraph 1.63)		
Recommendations To the UK Borde	er Agency and Group 4 Securicor	
Once a decision has been made to move a detainee to a residential holding facility or removal centre, they should be transferred promptly to avoid long detention in an unsuitable environment. (1.5, see paragraph 1.2)		
Documents being faxed by a detainee should not be disclosed to an immigration officer. (1.35, see paragraph 1.28)		
Detainees should not be held in the detention facility without an IS91 and IS91R. (1.39, see paragraph 1.36)		
Those who have complied with the conditions of their temporary admission and returned to the airport for further interview should not be held by DCOs. (1.40, see paragraph 1.37)		
Detainees should have access to email. (1.72, see paragraph 1.70)		
Recommendations	To Group 4 Securicor	
Detainees should not be handcuffed unless there is specific information indicating an increased risk of escape or harm to the detainee, staff or the public. (1.4, see paragraph 1.1)		
The holding room should be repainted and the decoration regularly inspected and maintained when necessary. (1.17, see paragraph 1.6)		
The holding room should be staffed by both male and fem at all times. (1.18, see paragraph 1.8)	ale detainee custody officers (DCOs)	

2.13 Detainees' property should be kept in a secure area. (1.19, see paragraph 1.9)

- 2.14 Toilet areas should have mirrors. (1.20, see paragraph 1.11)
- **2.15** Hygiene packs containing essential toiletries and clean towels should be available. (1.21, see paragraph 1.11)
- **2.16** Staff should use the telephone interpreting service to communicate with detainees who have little or no English. (1.29, see paragraph 1.25)
- **2.17** Details of the community legal advice line should be displayed in the holding rooms. (1.31, see paragraph 1.26)
- **2.18** Detainees being detained further should be provided with bail application forms and written guidance on how to make a bail application. (1.32, see paragraph 1.26)
- **2.19** Detainees should be able to make calls in private. (1.33, see paragraph 1.27)
- **2.20** Detainees should have free access to a fax machine. Notices explaining this should be displayed in the holding room. (1.34, see paragraph 1.28)
- 2.21 Detainee custody officers should receive refresher training in anti-bullying, and suicide and self-harm prevention and be trained in the assessment, care in detention and teamwork (ACDT) care planning system. (1.44, see paragraphs 1.41 and 1.42)
- 2.22 DCOs should carry anti-ligature knives. (1.45, see paragraph 1.43)
- 2.23 DCOs should receive training in safeguarding children. (1.49, see paragraph 1.47)
- **2.24** DCOs should receive training in diversity. (1.53, see paragraph 1.50)
- **2.25** Bibles, Qur'ans and prayer mats should be located in the holding rooms. (1.54, see paragraph 1.51)
- **2.26** The disabled toilet should have grip rails and a raised seat. (1.55, see paragraph 1.52)
- **2.27** There should be a television in both holding rooms. (1.58, see paragraph 1.56)
- **2.28** Detainees held for several hours should have access to exercise in the fresh air. (1.59, see paragraph 1.57)
- 2.29 Closed-circuit television footage should be recorded and retained. (1.62, see paragraph 1.60)
- **2.30** A range of frozen meals should be offered to detainees. (1.66, see paragraph 1.65)
- **2.31** A food comments book should be available. (1.67, see paragraph 1.65)
- 2.32 Non-transparent property bags should be available to detainees. (1.71, see paragraph 1.69)