Report on an unannounced full follow-up inspection of the non-residential short-term holding facility at:

## **Portsmouth Continental Ferry Port**

6 – 7 April 2009 by HM Chief Inspector of Prisons

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### Contents

Overview	4
Healthy establishment summary	5
Section 1: Progress on general recommendations	7
Section 2: Summary of recommendations	16

## Overview

The small non-residential short-term holding facility at Portsmouth ferry port is managed on behalf of the UK Border Agency by Group 4 Securicor and holds up to six detainees. Most detainees held either did not have a visa when they presented to immigration on arrival or were discovered travelling clandestinely in vehicles. About 68% were refused permission to enter the UK while 32%, usually overstayers, were given temporary admission. There had been a downward trend in the number of detainees held at the facility, from an average of 21 a month in 2005 to just five a month in 2008. This was partly explained by the fact that the facility used to deal with enforcement and arrivals, and now dealt only with arrivals. There were also fewer ferries using the port.

The facility was staffed seven days a week, but not overnight. Anyone needing to be detained overnight was taken to the local police station and brought back the following day. However, most detainees were sent back on the same or next ferry, so detention was usually brief. Of the 32 people held between November and February 2009, 22% were women and there had been four children. Length of detention ranged from 20 minutes to nine hours 10 minutes. No detainees were held during the inspection, although three had been detained the previous evening.

Of the 31 recommendations from the previous inspection relating to Portsmouth Continental Ferry Port, six were achieved, 11 were partially achieved and 14 were not achieved. We have made 33 further recommendations.

Inspected: 6-7 April 2009 Last inspected: 11 January 2006

Inspectors Susan Fenwick Lucy Young

### The healthy establishment summary

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 judicial processes.

#### Safety

HE.3 Staff said the use of arm locks and cuffs was not unusual, but use of force was not recorded or monitored. Key local immigration managers were unaware that the facility held children. Child protection policies had not been agreed with the local safeguarding children board and detainee custody officers had not received refresher training in child protection issues. Detainee custody officers had not received refresher training in anti-bullying and suicide prevention issues. Some detainees were held without completed IS91 (authority to detain) forms. UK Border Agency staff had oversight of the facility and we were told they visited it regularly, but there was no record of such visits. There was still no independent monitoring of the facility, although an independent monitoring board was being formed.

### Respect

HE.4 The environment had improved significantly and was now a more suitable size. Families and women could be kept separate from single men. There was a lack of washing facilities and detainees sat on a hard bench. Although they were often tired on arrival, detainees were not supplied with pillows or blankets to allow them to rest more comfortably. Detainee custody officers did not receive refresher diversity training. They made no use of interpreting services. Information displayed was in English only, including key information about legal support and the complaints process. Complaints forms were available only on request. Meals could meet most dietary needs. However, records indicated that a third of detainees did not have any food and a quarter were not offered any.

### Activities

**HE.5** There were insufficient activities to occupy detainees. In particular, all reading material was in English and there was no outside area.

### Preparation for release

**HE.6** Arrangements for detainees to make telephone calls were inconsistent. There was no provision of basic replacement clothing for detainees being removed. Detainees being transferred to further detention, usually at a police station, were not given information about where they were going.

## Progress on general recommendations

### To the Home Secretary

1.1 The Independent Monitoring Board National Council should be enabled to implement swiftly a mechanism for regular, independent monitoring of short-term holding facilities. (HE19)

Achieved. The UK Border Agency (UKBA) and the Independent Monitoring Boards (IMBs) had agreed to regular independent monitoring of short-term holding facilities and an IMB was being recruited.

# To the Director General (now Chief Executive), UK Border Agency

1.2 All holding facilities should have a comprehensive child protection policy agreed with the local Area Child Protection Committee or local Safeguarding Children Board. Staff in contact with children should receive appropriate training and all staff should undergo enhanced Criminal Records Bureau checks. (HE20) Partially achieved. The holding facility had a generic Group 4 Securicor (G4S) child protection policy dated 2005 and this was outlined on a flow chart on the wall. A generic UKBA document also contained guidance on children arriving in the UK. However, neither had been agreed with the local safeguarding children board (which had replaced the area child protection committee). All Portsmouth immigration officers had received the basic tier 1 training for safeguarding children, which was approved by the local safeguarding children board, and some had also received tier 2 training ('keeping children safe'). Detainee custody officers had received some basic initial but no refresher training. All new G4S staff received enhanced Criminal Records Bureau checks. Staff on duty all believed they had received enhanced checks.

#### Further recommendations

- **1.3** The child protection policy should be agreed with the local safeguarding children board.
- **1.4** All detainee custody officers should receive regular refresher training in safeguarding children.
- 1.5 All facility staff should be aware of the procedures for detaining children and should report to IND if those procedures appear not to have been carried out; all those claiming to be children should be treated as such until independent medical examination confirms otherwise. (HE21)

Achieved. No children were detained during the inspection. Detainee custody officers were aware of the G4S child protection policy and said they would take instruction from the immigration officers regarding the detention of children. A number of age dispute cases had been received, all of which were referred to social services.

#### **Additional information**

**1.6** The immigration inspector said the aim was to not detain children and was not aware that four children had been held in the previous four months. Records showed that the children were aged three, nine, 10 and 17. The children aged three and nine had been held for five hours,

the 10-year-old for 50 minutes and the 17-year-old for an hour. Detainee custody officers said they tried to keep families together in one of the interview rooms. They also said they would not close the holding or interview room door if a child was being held.

- **1.7** Staff were not aware of a code of conduct informing them of their duty to raise legitimate concerns about the conduct of colleagues and managers in their treatment of children.
- **1.8** There were no baby changing facilities.

#### Further recommendations

- **1.9** Managers should be aware when children are detained in the holding room.
- **1.10** There should be a code of conduct informing staff of their duty to raise legitimate concerns about the conduct of colleagues and managers in their treatment of children.
- **1.11** There should be facilities for baby changing.
- 1.12 Families with children and women should be held in separate and appropriate accommodation. (HE22) Achieved. The new accommodation contained two interview rooms, so detainees could be separated as required.
- 1.13 Detainees should always be provided with adequate telephone facilities and a free phone call on arrival to contact families and legal advisers and sort out practical problems. Detainees should be allowed to use mobile phones. (HE23) Partially achieved. Detainees were allowed to keep and use their mobile telephones provided there was no integral camera. A mobile telephone had recently been supplied, but detainees could use it only if they had their own SIM card. There was no payphone in the holding room. Some detainee custody officers said they would allow detainees to use a telephone in the staff area to make a free call to family or legal advisers if immigration staff gave permission, but others said they would not allow a call (see also paragraph 1.16). This telephone could receive incoming calls and custody officers said detainees who asked could give the number to their legal adviser.

#### Further recommendations

- **1.14** Detainees should be able to make a free telephone call in private on arrival to let someone know of their detention.
- **1.15** A telephone capable of receiving incoming calls should be provided in the holding room for detainees to use.
- 1.16 Detainees should be able to contact their legal representative by telephone, fax or email, free of charge, and in private, shortly after detention. Access or refusal should be documented. (HE24)

**Partially achieved.** There was no fax or email facility for detainees to use. There was some confusion about the circumstances in which detainees could use the office telephone (see paragraph 1.13). In practice, detainees rarely asked for telephone calls. Detainees' use or refusal of these facilities was not logged. Detainees' legal paperwork was sealed and kept with their property, but they could access it when required. Detainee custody officers said visitors were generally discouraged, but solicitors had sometimes visited detainees and had used the

interview room. We repeat the recommendation.

1.17 Written reasons for detention should be provided at the time of detention in a language the detainee can understand. (HE25) Not achieved. Written reasons for detention were provided in the IS91R, but this was in English only. UKBA immigration officers explained the paperwork, including reasons for detention, and used a telephone interpreter when necessary. We repeat the recommendation.

#### **Additional information**

**1.18** One immigration officer had designated lead responsibility for each detainee and a female officer was assigned to female detainees. We were told that in some circumstances detainees were placed in the holding room and removed without an IS91 being issued. This form is intended to ensure that detention is not arbitrary. It was also unclear if the IS91R (reasons for detention) form was always given to detainees,

#### Further recommendations

- **1.19** Detainees should not be placed in G4S custody by immigration staff, or accepted by DCOs, without a fully completed IS91.
- **1.20** Detainees should always be given an IS91R when detained for any period.
- 1.21 Medical examinations should always be conducted after every incident of use of force or self-harm and to detect any injuries on first detention. IND should monitor trends and where necessary commission investigations. (HE26) Not achieved. Staff said force was occasionally used on detainees and usually involved the use of arm locks as only two detainee custody officers were ever on at one time. They also said handcuffs were fairly regularly used as a precautionary measure when walking with detainees outside and during smoke breaks outside. However, use of force was not recorded, so trends were not monitored, and no medical examinations had been conducted. There had been no recorded incidents of self-harm. We repeat the recommendation.

#### Further recommendation

- 1.22 All incidents of use of force, including use of handcuffs, should be recorded.
- 1.23 Detainees should have access to a healthcare check within 24 hours of arrival. (HE27) Not achieved. Detainees had not been held at Portsmouth for over 24 hours. Custody staff could contact a medical triage helpline for advice if anyone indicated a medical problem, or would call an ambulance in an emergency.
- 1.24 There should be regular, documented supervision of each holding room by on-site immigration managers, reporting to senior managers at IND. (HE28) Partially achieved. Either the designated UKBA manager for the holding room or the duty manager visited the holding room when detainees were present. However, we saw no evidence that these visits were recorded.

#### Further recommendation

- **1.25** There should be regular documented supervision of each holding room by on-site immigration managers, including reference to issues raised and action taken.
- 1.26 Detainees should receive written information about the place of detention and what will happen next in a language they understand. (HE29) Partially achieved. The contractor's generic information booklet provided basic information about the holding room in 15 languages. There was no written information on what would happen next to detainees.

#### Further recommendation

**1.27** Detainees should be provided with written information in a language they can understand explaining what will happen next, including details of other places of detention and an explanation of the removal process.

#### 1.28 Detainees held for several hours should have access to an exercise area in the open air. (HE30)

**Not achieved.** There was no access to exercise in the open air. The holding centre was open for 18 hours from 6.15am. The average length of stay was three hours 12 minutes, with the longest recorded stay in the previous four months being nine hours 10 minutes. One custody officer said he sometimes allowed detainees to smoke in the open air outside the entrance to the holding room, but only if they agreed to be handcuffed (see paragraph 1.21). **We repeat the recommendation.** 

### 1.29 New escort vehicles should be examined to check that they provide a safe and decent environment. (HE31)

Achieved. Escort vehicles held up to six detainees and would be cramped if full, but were used only for very short journeys between the port and the holding room, or to the local police station. In the previous four months, vehicles had escorted a maximum of four detainees at a time. Unrelated men and women travelled in the same vehicle. The van we inspected was clean, had storage facilities and was covered by closed-circuit television. It also carried cartons of drinking water, a fire extinguisher and a first aid kit.

#### Further recommendation

**1.30** Unrelated male and female detainees should be escorted separately.

### To the holding facility manager

1.31 Custodial staff should receive refresher training in anti-bullying and suicide prevention. (HE32)

**Not achieved.** All new detainee custody officers were trained in anti-bullying and suicide and self-harm prevention as part of their initial training course. Otherwise, the only ongoing training was control and restraint refresher training every year and first aid training every three years. Three detainee custody officers we spoke to could not recall receiving any anti-bullying or suicide prevention training.

#### We repeat the recommendation.

- 1.32 Anti-bullying and harassment and suicide and self-harm policies and procedures should be in place in every holding room. (HE33) Achieved. The contractor's core standard operating procedures were available in the holding room and contained comprehensive anti-bullying and suicide and self-harm prevention policies and procedures.
- 1.33 Copies of all suicide and self-harm documentation should be kept in the holding facility for 12 months. (HE34)

**Not achieved.** No incidents had been recorded, but we were told that any incident reports and accompanying documentation were sent to the G4S area office immediately after an incident. Copies were not routinely held at the holding facility, but were sent to inspectors on request.

#### **Additional information**

**1.34** Staff said detainees were given a rub down search on arrival. This took place in the holding room or one of the interview rooms and was undertaken by a detention custody or immigration officer of the same sex as the detainee. Officers said they removed detainees' belts and sometimes shoe laces without risk assessment in case they were used to self-harm or as a weapon.

#### Further recommendation

- **1.35** Belts, shoes and other items of clothing should not be removed from detainees without risk assessment.
- 1.36 All holding rooms should have documented and approved fire and health and safety policies and procedures. (HE35) Partially achieved. The contractor's information booklet gave detainees generic information about what to do in an emergency, explaining that they should follow staff instructions. A local emergency evacuation procedure was kept in a folder in the staff area. The detainee custody officers on duty at the time of the inspection were aware of what action to take in an emergency, but not all could locate the relevant written procedures.

#### Further recommendation

**1.37** Emergency evacuation procedures should be prominently displayed in staff areas and in the holding room in different languages.

#### **Additional information**

**1.38** There was a closed-circuit television camera at either end of the holding room. Staff could monitor the pictures on a screen in the staff area, but did not know whether the images were recorded. An alarm system was not used. Instead, detainees were told to knock on the door if they required assistance, which was adequate. The door between the holding room and the staff area was half glazed and allowed good observation. The only blind spot was covered by closed-circuit television. There was no staff panic button to call assistance to the facility if necessary.

#### Further recommendation

**1.39** There should be a panic button in the facility that alerts other departments in an emergency.

1.40 General information about legal rights including how to apply for bail and how to find competent and qualified legal advice should be freely available to detainees in a range of common languages. (HE36) Partially achieved. Telephone numbers for the Refugee Legal Centre, the Immigration Advisory Service and the Joint Council for the Welfare of Immigrants were displayed on the holding room wall (even though the local organisation no longer provided direct advice). Telephone numbers for the first two organisations were also included on the back of the IS91 reasons for detention form issued to detainees. There was no other accessible information, such as the translated Office of the Immigration Services Commissioner leaflets available in many facilities.

We repeat the recommendation.

1.41 There should be a race relations and diversity policy in every holding room. (HE37) Achieved. A diversity policy was contained within the core operating procedures and a copy in English was on display in the staff area. Although staff were aware of the policy, two custody officers we spoke to could not remember ever receiving training or refresher training in race relations or diversity issues and said they were not always confident about how to deal with detainees from other cultures. They did not use any interpreting services and said they managed to communicate by miming.

#### Further recommendations

- **1.42** Staff should have regular refresher training in race relations and diversity issues.
- **1.43** The diversity policy should be displayed in the holding room in a range of languages.
- **1.44** Detainee custody officers should have access to a telephone interpreting service to communicate with detainees who do not speak English or when detainees are trying to communicate with them.

## 1.45 There should be adequate sleeping and sanitary provision for people detained overnight. (HE38)

**Partially achieved.** Detainees were not held in the unit overnight so full sleeping provision was not required. However, records showed that people had been detained for over nine hours. A solid bench ran the length of one wall and was 0.7 metres wide. It was hard, had no cushions or back support and would have been uncomfortable after a short period. Staff said detainees were often tired on arrival, having spent many hours hidden in vehicles, but they did not supply pillows and blankets to allow them to lie down and rest. Staff could not recall ever issuing detainees with one of a stock of foil blankets. There was a men's and a women's toilet. The women's toilet had a sanitary disposal bin and a small stock of tampons, but no sanitary towels. Both contained ligature points and neither had washing facilities. A very small sink in the staff area was also used by staff to wash dishes. Staff said many detainees had been sleeping rough and were dirty and sometimes cold and wet, but there were no washing facilities and no supplies of fresh clothing.

#### Further recommendations

- 1.46 The benches should have cushioned seating.
- 1.47 A supply of clean blankets and pillows should be available to detainees.
- **1.48** Toilet cubicles should contain washing facilities and be free of ligature points.

- 1.49 A suitable stock of sanitary products should be available in the women's toilet.
- **1.50** Detainees should be able to have a shower.
- **1.51** There should be a supply of suitable clean clothing for detainees who may need a change of clothes on arrival or before their release, transfer or removal.
- 1.52 Holding rooms should contain newspapers, books, notices and other reading material in different languages, including basic information on the facility. (HE39) Partially achieved. Generic basic information on detention in a short-term holding facility was available in 15 languages and complaint forms were available on request in 20 languages. However, all other information available or displayed was only in English. The only activities to occupy detainees comprised a television, a box of children's toys and a few magazines and children's books in English only. A notice in English in the holding room said that a Bible and Qur'an were available on request. These were stored in the staff area along with a giblah and prayer mat. Their availability was also covered in the contractor's information booklet.

#### Further recommendation

- **1.53** The holding room should contain newspapers, books, notices and other reading material in different languages.
- 1.54 Arrangements should be in place to allow detainees to recover or arrange for the disposal of their property and detainees should be informed of this. (HE40) Not achieved. There were no arrangements for the disposal or recovery of property. The circumstances of most arrivals meant such arrangements were rarely necessary. However, staff gave examples where a procedure would have been useful, such as when a detainee had wanted to have some property delivered to a relative, but was not able to do so. We repeat the recommendation.
- 1.55 Copies of all control and restraint incident reports and all complaints should be retained in every holding room for a minimum of 12 months. (HE41) Not achieved. Use of force incident reports and complaints were sent to the central office and could be accessed on request (see also paragraph 1.21 and recommendation 1.22).

#### Additional information

**1.56** A complaints box had recently been installed in the holding room area and a notice above it explained the procedure in English. Complaints forms were available in 20 languages, but had to be requested from staff. This made it unnecessarily difficult for detainees to complain, particularly if their complaint related to detainee custody staff. The duty chief immigration officer checked the complaints box whenever a detainee had been held and any complaints were forwarded to headquarters. There had been no complaints by detainees held at this facility in the previous 12 months.

#### Further recommendations

- **1.57** Information about the complaints procedure should be displayed in a range of languages.
- **1.58** Complaints forms should be freely available to detainees and should not have to be asked for.

## 1.59 Detainees should be aware of how to make a racist incident complaint and assisted to do so. (HE42)

**Not achieved.** There was no separate procedure for making a racist incident complaint and no definition of a racist incident was displayed. Detainees could use the general complaints system to make a racist incident complaint and a notice in the holding room explained the complaints procedure. Staff were not aware of any racist incident complaints, but said they would refer any to a UKBA manager on site.

#### Further recommendation

- **1.60** Notices defining a racist incident and informing detainees how to make a complaint should be displayed in the holding room in a range of languages.
- 1.61 An assessment of the impact of policies on different religious, ethnic and cultural groups should be conducted. (HE43) Not achieved. Staff were not aware of any formal impact assessments. We repeat the recommendation.
- 1.62 There should be a disability policy and a designated disabilities officer for every holding room. (HE44)

**Partially achieved.** The contractor had recently revised its generic disability policy and had appointed a national disability officer. There were no policies or procedures specific to Portsmouth and no designated disabilities officer for the holding room. UKBA managers said they would not detain anyone with a serious disability and we saw no evidence that they had.

#### Further recommendation

- **1.63** A disability policy specific to Portsmouth should be produced and a designated disabilities officer for the holding room appointed.
- 1.64 A female custody officer should be on duty when women or children are detained. (HE45)

Not achieved. Only one of the six detainee custody officers was female and she therefore covered only a third of all shifts. If women or children were detained when she was not on duty, they would be searched by a female immigration officer, but there would otherwise be only male officers available during their stay. We repeat the recommendation.

1.65 All holding rooms should have a menu of food items on offer, translated into common languages, or with pictures, indicating halal, vegetarian and vegan options. (HE46) Not achieved. No menu was available. We repeat the recommendation.

#### **Additional information**

**1.66** Pre-packed microwave meals were available to meet all dietary requirements and detainee custody officers said they could use a petty cash budget to buy additional food to meet specific needs, such as baby food. They said they usually had some snack packs, but had run out of these at the time of our inspection. There was no drinks dispenser in the holding room. Staff could make detainees hot drinks in the staff kitchen area and there were bottles of water in the fridge. Detainee custody officers said detainees were offered a drink and a hot meal on arrival,

but records indicated that a third of detainees did not have any food and a quarter were not offered any.

#### Further recommendations

- **1.67** Detainees should routinely be offered food.
- **1.68** There should be a supply of snack packs available.
- **1.69** The facility should have a free hot and cold drinks dispenser.
- 1.70 Copies of detainee reception logs should be kept in holding rooms for a minimum of three months. (HE47) Not achieved. Reception logs were held centrally and were quickly made available to us, which was acceptable.

#### Other recommendations

- 1.71 There should be a secure storage area for detainees' property. (3.14) Not achieved. There was no secure storage area for detainee property. Detainee custody officers said property was tagged and stored in the staff area. We repeat the recommendation.
- 1.72 The present holding room should be replaced by a larger, suitably equipped holding area, with adequate sanitary facilities and furniture. (3.15) Partially achieved. The holding room had been moved to a much more appropriate facility with a larger holding room measuring 4.28 metres by 2.4 metres plus two interview rooms and a more suitable staff area. Sanitary facilities remained inadequate (see paragraph 1.45). There was no table where detainees could eat meals. Obscured windows at ceiling height allowed some natural light into the room. The room was clean, but the walls were bare. There was a television in one corner of the room. There were plans for a new facility to be built by 2011-12.

#### Further recommendations

- **1.73** There should be a table and chairs to enable detainees to read, write and eat a meal comfortably.
- **1.74** Pictures or posters should be displayed on the walls to soften the environment.

## Section 2: Summary of recommendations

The following is a list of further recommendations included in this report. The reference numbers in brackets refer to the paragraph location in the main report.

	Recommendations	To the Chief Executive, UK Border Agency
2.1	The child protection policy should be agreed	with the local safeguarding children board. (1.3)
2.2	All detainee custody officers should receive (1.4)	regular refresher training in safeguarding children.
2.3	Managers should be aware when children a	re detained in the holding room. (1.9)
2.4	There should be a code of conduct informin about the conduct of colleagues and manag	g staff of their duty to raise legitimate concerns ers in their treatment of children. (1.10)
2.5	There should be facilities for baby changing	. (1.11)
2.6	Detainees should be able to make a free tel know of their detention. (1.14)	ephone call in private on arrival to let someone
2.7	A telephone capable of receiving incoming detainees to use. (1.15)	calls should be provided in the holding room for
2.8		gal representative by telephone, fax or email, free tion. Access or refusal should be documented.
2.9	Written reasons for detention should be prodetainee can understand. (1.17)	vided at the time of detention in a language the
2.10	Detainees should not be placed in G4S cus without a fully completed IS91. (1.19)	tody by immigration staff, or accepted by DCOs,
2.11	Detainees should always be given an IS91F	R when detained for any period. (1.20)
2.12		nducted after every incident of use of force or self- ntion. UKBA should monitor trends and where )
2.13	All incidents of use of force, including use o	f handcuffs, should be recorded. (1.22)
2.14	There should be regular documented super managers, including reference to issues rais	vision of each holding room by on-site immigration sed and action taken. (1.25)
2.15	Detainees should be provided with written in	nformation in a language they can understand

**2.15** Detainees should be provided with written information in a language they can understand explaining what will happen next, including details of other places of detention and an explanation of the removal process. (1.27)

- **2.16** Detainees held for several hours should have access to an exercise area in the open air. (1.28)
- 2.17 Unrelated male and female detainees should be escorted separately. (1.30)

#### Recommendations To the holding facility manager

- 2.18 Custodial staff should receive refresher training in anti-bullying and suicide prevention. (1.31)
- **2.19** Belts, shoes and other items of clothing should not be removed from detainees without risk assessment. (1.35)
- **2.20** Emergency evacuation procedures should be prominently displayed in staff areas and in the holding room in different languages. (1.37)
- 2.21 There should be a panic button in the facility that alerts other departments in an emergency. (1.39)
- **2.22** General information about legal rights including how to apply for bail and how to find competent and qualified legal advice should be freely available to detainees in a range of common languages. (1.40)
- 2.23 Staff should have regular refresher training in race relations and diversity issues. (1.42)
- 2.24 The diversity policy should be displayed in the holding room in a range of languages. (1.43)
- **2.25** Detainee custody officers should have access to a telephone interpreting service to communicate with detainees who do not speak English or when detainees are trying to communicate with them. (1.44)
- 2.26 The benches should have cushioned seating. (1.46)
- **2.27** A supply of clean blankets and pillows should be available to detainees. (1.47)
- 2.28 Toilet cubicles should contain washing facilities and be free of ligature points. (1.48)
- 2.29 A suitable stock of sanitary products should be available in the women's toilet. (1.49)
- **2.30** Detainees should be able to have a shower. (1.50)
- **2.31** There should be a supply of suitable clean clothing for detainees who may need a change of clothes on arrival or before their release, transfer or removal. (1.51)
- **2.32** The holding room should contain newspapers, books, notices and other reading material in different languages. (1.53)
- **2.33** Arrangements should be in place to allow detainees to recover or arrange for the disposal of their property and detainees should be informed of this. (1.54)
- 2.34 Information about the complaints procedure should be displayed in a range of languages. (1.57)

- 2.35 Complaints forms should be freely available to detainees and should not have to be asked for. (1.58)
- **2.36** Notices defining a racist incident and informing detainees how to make a complaint should be displayed in the holding room in a range of languages. (1.60)
- **2.37** An assessment of the impact of policies on different religious, ethnic and cultural groups should be conducted. (1.61)
- **2.38** A disability policy specific to Portsmouth should be produced and a designated disabilities officer for the holding room appointed. (1.63)
- 2.39 A female custody officer should be on duty when women or children are detained. (1.64)
- **2.40** All holding rooms should have a menu of food items on offer, translated into common languages, or with pictures, indicating halal, vegetarian and vegan options. (1.65)
- 2.41 Detainees should routinely be offered food. (1.67)
- 2.42 There should be a supply of snack packs available. (1.68)
- 2.43 The facility should have a free hot and cold drinks dispenser. (1.69)
- 2.44 There should be a secure storage area for detainees' property. (1.71)
- 2.45 There should be a table and chairs to enable detainees to read, write and eat a meal comfortably. (1.73)
- 2.46 Pictures or posters should be displayed on the walls to soften the environment. (1.74)