

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

Eaton House, Hounslow

8 August 2011

by HM Chief Inspector of Prisons

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Overview

The short-term holding facility at Eaton House has been operated by Reliance since 1 May 2011, under contract to the UK Border Agency (UKBA). The building also houses the UKBA reporting centre for west London. Occupants of the holding room comprise those detained on reporting at the centre and those brought in from the community by UKBA arrest teams. Most detainees are moved from Eaton House to an immigration removal centre.

Supervision by UKBA managers was patchy: the last recorded visit by an executive officer had taken place four working days before the inspection. Staff were experienced and competent, but did not establish a positive rapport with detainees.

Four people were detained in the holding room on the day of the inspection. They did not include detainees arriving from prisons or families with children.

In the three months before the inspection, 325 people had been detained (an average of over five a day). The average length of stay had been 3 hours 47 minutes, and the longest period of detention had been 11 hours 5 minutes. Of these 68 (21%) were women. No children had been held.

Inspectors

Martin Kettle

Colin Carroll

Inspected: 8 August 2011

Last inspected: 4 June 2007

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 Detainees who had been brought in by arrest teams said that the teams had been abrupt and 'a little rude'. One detainee wearing flips-flops said he had not been allowed to put shoes on before leaving. Another said he had been immediately handcuffed and had not been allowed to put on a jacket.

HE.4 The Reliance vans were an improvement on the caged vehicles which they had replaced, although there was inadequate luggage space.

HE.5 Detainees had been searched three times: on entering the facility, moving from the reporting centre to an interview room, and entering the holding room. All detainees were handcuffed from the holding room to escort vehicles for transfer, without regard to evidence of individual risk.

HE.6 Staff were alert to bullying issues, but the facilities were inadequate to protect women from potential risk and we were told that there had not always been a female member of staff on duty. Officers made good use of recently produced forms on the risk of self-harm but these forms were not conspicuous and could easily have been overlooked.

HE.7 There was no CCTV in the holding room, although there was coverage in the staff areas and corridors. Sight lines from the staff office to the holding room were good, but there was a small blind spot not covered by a mirror placed on the far wall.

HE.8 IS91 authorisation forms were in place for all detainees, although in one that we examined the risk assessment form had not been completed. Reliance staff never admitted detainees without this form, although they said they were sometimes asked

to. Arrest teams bringing in detainees before the Reliance staff shift began supervised the detainees themselves. Legal advice was available only by telephone and information displayed about legal representation was out of date.

- HE.9 Children were no longer held at the facility, although the new UK Border Agency family returns policy was expected to lead to occasional detention of families in the future. There were no suitable facilities for detaining children, although there was an appropriate family interview room.
- HE.10 Appropriate use had been made of the medical triage telephone line and of ambulance services to meet the health needs of detainees. Good provision was made for fire safety, with extinguishers and notices prominently displayed in seven languages, and evacuation procedures were explained to detainees by staff.

Respect

- HE.11 The holding room was bare and sparsely furnished with hard bench seats, and needed redecoration. There were no facilities for keeping men and women apart, and no guidance to staff on limits to mixing women with men, although the maximum of eight people at a time was strictly observed.
- HE.12 Staff said that the room was cold in winter and that they could not control its temperature. They said that it depended on the temperature set for the whole building, which tended to leave the holding room itself cold, since it had no radiators but only pipes.
- HE.13 The toilets had a six-inch gap above and below the doors. They consisted of stainless steel fittings with no seats and a handwash facility set into the wall. There was no access to a shower or a proper washbasin.
- HE.14 Staff were polite but did not attempt to establish a rapport with detainees. They said they felt that detainees generally preferred staff not to engage with them other than responding to occasional requests.
- HE.15 Complaint forms were available in six languages. The complaints box was not emptied daily – a UKBA manager, scheduled to visit the holding room and empty the box each working day, had visited on only 13 days in July 2011 and 16 in June. The facility had last been checked in this way four working days before the inspection .
- HE.16 Staff had had some training in equality issues, but there was no equality policy on display. There was adequate material for the practising of religion. One detainee was fasting and due provision was made for him. Staff were familiar with telephone interpretation, although they said there was little need for it.
- HE.17 Sandwiches were delivered at 10am and detainees were held for 2½ hours with only crisps and biscuits available. No hot food or fresh fruit was available at any time.

Activities

- HE.18 The holding room contained a small number of foreign language books and a plentiful supply of past issues of magazines. A very small television was located at high level and was kept at an inaudibly low volume.

Preparation for release

HE.19 There was good access to telephones with a payphone which could receive incoming calls. Detainees could retain their mobile phones unless they had recording facilities in which case they were loaned dummy phones into which they could insert their SIM card. There was no access to a fax or email.

Section 1

Escorts, vans and transfers

Expected outcomes:

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

- 1.1 On the day of the inspection, three detainees had been brought to Eaton House by a UK Border Agency (UKBA) arrest team at 7.35am. They told us that the team had been abrupt and 'a bit rude'. One detainee was wearing flip-flops and had no other shoes with him. He said that the arrest team had refused to let him put shoes on before leaving. Another said that he had asked to put on a jacket before leaving, but this had been refused because handcuffs had already been applied. We observed arrest team members entering the room and summoning a detainee for an interview by abruptly calling out his surname and beckoning.
- 1.2 Staff said that they frequently did not receive any notice of which detainees would be arriving, or any key information about them such as risk factors.
- 1.3 The vans in which detainees were taken to Colnbrook and Harmondsworth immigration removal centres on the day of the inspection were clean and well equipped. Staff said that the lack of luggage space on the vans was frequently an issue.

Recommendation

- 1.4 Arrest team members should observe appropriate standards of courtesy and should permit detainees being arrested to put on outdoor clothes.

Housekeeping point

- 1.5 Advance information on any risk factors should be given to the holding room staff.

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 Detainees were greeted courteously by staff on arrival. They were searched in the open staff area in full view of the holding room. Detainees were searched three times: on entry to the reporting centre, on arriving at an interview room, and on being located to the holding room. This was unnecessary and demeaning.
- 1.7 There was only one holding room measuring 5m by 4.6m, with no facility for keeping men and women apart. The room was bare and sparsely furnished, with four hard double bench seats at two tables. The seats and tables were fixed. The walls were grubby and in need of redecorating. There was good natural light in the room. No paper or pencils were available for detainees' use.

- 1.8 Staff were not aware of any guidelines on the ratio of men and women who could be held at any one time and there was no UKBA policy on this. They adopted the principle of three to one and managers left it to them to assess the level of risk in each situation and apply for swift transfer as appropriate. Occupancy of the holding room never exceeded the maximum capacity of eight people, although we were told that a larger number was sometimes detained in interview rooms without appropriate supervision (see casework section). On one occasion during the three months before the inspection, a woman had been held for almost two hours with seven men in the room at the same time. Sixty-eight women were held during this period, 21% of the total.
- 1.9 Staff said that the holding room was cold in winter, and the temperature could not be controlled by the staff. They said that it depended on the temperature set for the whole building, which tended to leave the holding room itself colder than the rest of the building, since it had no radiators but only hot water pipes. No clothing was available for issue other than socks, but blankets, pillows and pillow-cases were provided. There were no laundry facilities and a member of staff took the bedding home to wash it. Hygiene packs were issued, containing basic toilet requisites.
- 1.10 There was a drinking fountain in the holding room. There were separate toilets for men and women, which had bare stainless steel bowls with no seat. They opened straight on to the holding room and had a six-inch gap above and below the doors, allowing minimal privacy. A handwash facility was set into the wall of each toilet and there was no access to a shower or a proper washbasin. Sanitary supplies were available for women and nappies and changing mats were available if children should be admitted in the future.
- 1.11 There was no provision for secure storage of property and luggage. However, the quantity was generally not significant and staff were able to keep property in their office.

Recommendations

- 1.12 Women should be held separately from men.
- 1.13 Toilets should provide reasonable privacy and should have normal toilet bowls with seats.

Housekeeping points

- 1.14 Holding room staff should be able to control the temperature in the holding room independently of the rest of the building.
- 1.15 Basic clothing should be available for issue and there should be a system for laundering bedding and clothing.
- 1.16 Washing facilities should be provided.

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.

- 1.17 Staff were reasonably welcoming and courteous to detainees, but did not interact positively with them or attempt to establish a rapport. They said that they had been rebuffed on previous occasions and that detainees in general preferred staff not to engage with them. They therefore only went into the holding room occasionally to ask detainees if they needed anything.

Recommendation

- 1.18 **Holding room staff should seek to establish a rapport with and offer support to all detainees.**

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.

- 1.19 Detainees were able to retain their legal documents. At the time of the inspection, four detainees were held, all of whom had been given written reasons for their detention (IS91R) which they had with them.
- 1.20 Written reasons for detention were issued in English only. Two of the four detainees could not read English and the contents of the IS91R had been explained through an interpreter.
- 1.21 Detainees were able to contact their legal representatives by telephone, but not by fax or email. Legal representatives were unable to visit detainees in the facility.
- 1.22 Information on accredited legal representation was out of date. A notice beside the payphone gave details of two defunct organisations: Refugee and Migrant Justice and the Immigration Advisory Service. Other notices gave the telephone numbers of the Law Society, Refugee Council and the Joint Council for the Welfare of Immigrants, none of which offered immediate immigration advice to detainees. Information on the Legal Service Commission funded community legal advice helpline was not available.

Recommendations

- 1.23 **Written reasons for detention should be issued in detainees' own languages.**
- 1.24 **Detainees should be able to contact their legal representatives by fax and email without impediment.**
- 1.25 **The UK Border Agency should consult the Legal Service Commission about allowing detainees access to the 'police station immigration telephone advice scheme' or a similar service.**

Housekeeping point

- 1.26 Notices should inform detainees of active and relevant sources of legal advice, specifically the community legal advice helpline.

Casework

Expected outcomes:

Detention is carried out on the basis of individual reasons that are clearly communicated.

Detention is for the minimum period necessary

- 1.27 During the three months prior to our inspection, 325 detainees had been held in the facility, an average of over five a day. Twenty-seven of these had been held for over eight hours, of whom eight were there for over 10 hours. Lengths of stay were not always correctly calculated on the log sheets – on one day, the length of stay for all five detainees was calculated wrongly.
- 1.28 UKBA gave prior notice to holding room staff each day of people who were to be detained under normal procedures, but others were also brought in, often without notice. Those attending the reporting centre were detained without advance notice. Detainees picked up by arrest teams could be held before the detainee custody officers (DCOs) started their shifts. The facility was staffed by DCOs from 9am to 6pm. On the day of our inspection three detainees were held by enforcement officers from 7.40am until 9am when the first DCO arrived. Enforcement officers from five local immigration teams used the facility.
- 1.29 The fourth detainee on the day of the inspection had reported to the centre in the morning and had been interviewed by an immigration officer at 10.30am. At about 2.15pm, the detainee was placed in the holding room for half an hour before being escorted to a removal centre.
- 1.30 The holding room could hold a maximum of eight detainees. On occasion more than eight were held in the centre. We were told that extra detainees had been held alone in UKBA interview rooms without appropriate supervision.
- 1.31 We were told that enforcement officers occasionally asked DCOs to hold detainees without the written authority (IS91). The officer we spoke to said he always refused and referred the officers to an UKBA notice on the holding room door which said: 'No persons accepted without an IS91'.
- 1.32 Detainees' paperwork was generally in good order. All had signed authority to detain (IS91), although the section on risk factors had not been completed on one. The movement orders and 'in-country escorting detainee welfare records' were in good order.

Recommendations

- 1.33 **No more than eight detainees should be held. Detainees should not be held in UKBA interview rooms.**
- 1.34 **The risk assessment on the 'authority to detain' form IS91 should always be completed. If there are no risk factors, the section should be marked to confirm that the assessment has been completed.**

Housekeeping point

- 1.35 Lengths of stay should be correctly entered in records.

Duty of care

Expected outcomes:

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

Bullying

- 1.36 The single holding room meant that women might be subject to unwanted attention and this was not helped by minimal staff interaction (see sections on arrival and accommodation and positive relationships). The facility usually had both a male and female staff but DCOs told us that this did not happen on all shifts. We were subsequently told of a commitment to have a female officer on duty at all times from July 2011.
- 1.37 There was no CCTV in the holding room and DCOs did not have adequate sight of the whole room (see section on facility rules). There was a blind spot which was not covered by a mirror on the wall of the holding room.
- 1.38 Staff told us that they were vigilant in looking for evidence of bullying or intimidation but that it rarely happened. The detainee information booklet stated that bullying was not tolerated and if detainees felt intimidated they should contact a DCO.

Recommendations

- 1.39 There should be a male and female member of staff on duty at all times.
- 1.40 DCOs should be able to see all areas of the holding room clearly.

Suicide and self-harm

- 1.41 Staff had received training from a workplace coach on suicide and self-harm prevention. Detainees at risk of self-harm were entered on a 'suicide/self-harm warning' form which was a Reliance document and not immediately recognisable by staff throughout the immigration estate. The form covered relevant information and included a space for continued observations, but it did not encourage the same level of rigour associated with the well-established ACDT (assessment, care in detention and teamwork) process.

Recommendation

- 1.42 Detainees at risk of self-harm should be placed on assessment, care in detention and teamwork (ACDT) plans. Detainee custody officers should be trained in ACDT procedures.

Health

- 1.43 Health advice was available from a triage line which staff had used on a number of occasions. They had called ambulances promptly if detainees showed or described symptoms of acute illness, which had happened three times in the preceding three months. The two staff on duty had received refresher training in first aid, one of them within the last 12 months and the other earlier in 2010.

- 1.44 A detainee held in the facility during our inspection arrived with a report from a psychoanalyst which said that he suffered from post-traumatic stress disorder. The detainee was on three types of medication, one of which was held by facility staff and the others were at the detainee's home. The detainee complained that he was hearing voices and asked an officer for access to his medication as he believed it would help him calm down. The officer checked the medication, which was only to be administered at night, and appropriately refused to give it to the detainee. The officer reassured the detainee that he would shortly be taken to an immigration removal centre where he would see a nurse and, if necessary, a doctor.

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

- 1.45 DCOs were checked to Criminal Records Bureau enhanced level but had not received child protection training. A child-friendly interview room was used by UKBA to interview people accompanied by children. The room had soft furnishing and the desk had been removed. The chairs were movable and the atmosphere was more relaxed than the other four interview rooms.

Recommendation

- 1.46 Staff 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.

- 1.47 Detainees in the three months before the inspection were of 43 nationalities, the most common being Indian (77), Sri Lankan (50) and Pakistani (47), with 34 from Brazil and 33 from Afghanistan. Initial training for staff included equality issues but staff had received no refresher training. Detainees were able to complain about racist incidents using the standard complaint forms (see section on complaints). Staff were familiar with the telephone interpretation service, and had used it, although they said that the great majority of detainees understood English well.
- 1.48 Detainees were able to practise their religion. A bible and Qur'an and a prayer mat were available in the holding room. Ramadan was taking place at the time of the inspection and staff were sensitive to Muslim detainees' needs. A compass was available to locate the qibla. Staff had a print out from the internet advising what time fasting should end in London.
- 1.49 Ten people over the age of 60 had been detained in the previous three months, of whom two were over 70. There was no toilet in the facility for people with disabilities but there was one in the reporting centre. There were no notices explaining the contractor's commitment to equality and diversity.

Housekeeping point

- 1.50 Notices should be displayed explaining the contractor's commitment to equality and diversity.

Activities

Expected outcomes:

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

- 1.51 A limited, random selection of books was available, including a small number in languages other than English and a few children's books and puzzle books. There was a plentiful supply of past issues of popular celebrity magazines, but there were no newspapers.
- 1.52 A very small television was located at high level. The volume was kept at an inaudibly low level which staff said could not be increased because it would be a distraction in the adjacent interview rooms. There was a portable DVD player with some DVDs suitable for children.
- 1.53 No smoking was permitted in any part of the facility and no aids such as patches were available. Detainees had no access to fresh air.

Housekeeping points

- 1.54 A planned selection of books should be available, including the languages most commonly spoken by detainees, together with current newspapers or periodicals.
- 1.55 The television should be easily visible and audible.

Facility rules

Expected outcomes:

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

- 1.56 All detainees were handcuffed from the holding centre to escort vehicles for onward transfer, regardless of the risks they posed. Staff confirmed that this was a universal practice. The compound in which detainees boarded vans was insecure, so that in many cases handcuffs were used when there was little information on risk.
- 1.57 There had been no use of force in the previous 12 months. CCTV facilities covered the staff area and areas through which detainees were escorted to and from the holding room, but there were no cameras or coverage in the holding room itself.

Recommendations

- 1.58 Detainees should be handcuffed only on the basis of assessment of risk in each case.
- 1.59 CCTV coverage should be extended to include the whole of the holding room.

Complaints

Expected outcomes:

There is a published complaints procedure; complaint forms are freely available.

- 1.60 Notices explaining UKBA's complaints policy in English and 10 other languages were displayed in the holding room. UKBA complaints forms were available in 14 different languages. Only six were available in the holding room and some detainees had to ask a DCO for a complaint form, which was inhibiting. UKBA had updated their complaint forms in May 2011 but the forms in the holding room were out of date. During the three months since the start of the new contract, one complaint had been received. It had been submitted on 13 July, removed from the box on 15 July and faxed to UKBA complaints department on 20 July. No acknowledgement or further action had yet been recorded, other than reference by Reliance head office to the relevant manager for response.
- 1.61 The complaints box was not emptied each day. A chief immigration officer was scheduled to visit the holding room daily and, among other tasks, empty the complaints box. In June the box had been emptied on 16 out of 22 days and in July only 13 out of 21 days. The box had last been emptied four working days prior to our inspection.
- 1.62 A detainee feedback survey form was available in English only for detainees to comment on their experiences in detention. Completed forms were passed to DCOs and collected centrally. A Reliance suggestions form was also available in 14 languages.

Recommendation

- 1.63 **The complaints box should be emptied daily, complaints dealt with swiftly and results communicated to detainees wherever possible.**

Housekeeping point

- 1.64 Up-to-date complaints forms in English and 14 other languages should be freely available in the holding room.

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 At the time of our arrival in the morning, the only food available for the detainees who had been arrested at an early hour was crisps and biscuits. Sandwiches were delivered at 10am on Mondays and Wednesdays and stored in a refrigerator. There were no facilities to provide hot food, nor was fresh fruit available at any time, which was unreasonable in a facility which often held detainees for many hours. A free drinks machine provided hot and cold drinks. Pictures on the holding room wall enabled staff and detainees to point to images of a drink, a sandwich and biscuits, to aid communication.
- 1.66 Staff did not hold any petty cash to buy small items needed by people who had been detained without notice.

Recommendations

- 1.67 There should always be a range of fresh sandwiches available to suit all diets.
- 1.68 Hot food should be available to provide main meals at the appropriate times.

Housekeeping point

- 1.69 A small amount of petty cash should be available to staff in case of urgent need.

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.

- 1.70 Visitors were not allowed access to detainees, but they were able to deliver property. Many detainees were detained after reporting at the centre not expecting to be held and their property was at their home address. Property was stored in the DCOs' office and detainees were not allowed access to it while in the holding room.
- 1.71 Detainees were allowed to retain mobile phones which had no recording equipment. Those with prohibited phones were offered a dummy phone into which they could transfer their SIM card. A payphone in the holding room took incoming calls and outgoing calls could be made using coins or credit cards. Detainees with no mobile phone or cash were asked if they would like anyone notified of their whereabouts and the DCO called to advise the relative or friend of the holding room pay phone number. Detainees were not allowed to use the fax machine in the DCOs' office and had no access to email.
- 1.72 The detainees brought in by the arrest teams said that three hours later they still did not know what would happen to them. When movement orders were issued, they were informed and given cards with a map and the address and contact details of the immigration removal centre (IRC). Records for the past few days kept in the holding room showed that 80% of detainees had been moved to Colnbrook or Harmondsworth IRCs. The destinations for those leaving Eaton House over the three months before the inspection were: Harmondsworth 28%, Colnbrook 27%, Yarl's Wood 21%, Tinsley House 8%, temporary admission 8%, Brook House 5%, with 3% taken to hospital or a police station.
- 1.73 Detainees were given a rubdown search before leaving the facility and their mobile phones and cash were placed in a sealed plastic pouch.
- 1.74 It was the contractor's policy to place all detainees leaving the facility in handcuffs with the exception of pregnant women (see section on facility rules).

Recommendation

- 1.75 Detainees should be given information as early as possible about what is likely to happen to them.

Section 2: Recommendations and good practice

Recommendations	To UKBA
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Escorts, vans and transfers

- 2.1 Arrest team members should observe appropriate standards of courtesy and should permit detainees being arrested to put on outdoor clothes. (1.4)

Legal rights

- 2.2 Written reasons for detention should be issued in the detainees' own languages. (1.23)
- 2.3 The UK Border Agency should consult the Legal Service Commission about allowing detainees access to the 'police station immigration telephone advice scheme' or a similar service. (1.25)
- 2.4 The risk assessment on the 'authority to detain' form IS91 should always be completed. If there are no risk factors, the section should be marked to confirm that the assessment has been completed. (1.34)

Recommendation	To UKBA and the escort contractor
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Facility rules

- 2.5 Detainees should be handcuffed only on the basis of assessment of risk in each case. (1.58)

Recommendation	To UKBA and the facility contractor
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- 2.6 Detainees should be able to contact their legal representatives by fax and email without impediment. (1.24)

Recommendations	To the facility contractor
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Arrival and accommodation

- 2.7 Women should be held separately from men. (1.12)
- 2.8 Toilets should provide reasonable privacy and should have normal toilet bowls with seats. (1.13)

Positive relationships

- 2.9 Holding room staff should seek to establish a rapport with and offer support to all detainees. (1.18)

Legal rights and casework

- 2.10 No more than eight detainees should be held. Detainees should not be held in UKBA interview rooms. (1.33)

Duty of care

- 2.11 There should be a male and female member of staff on duty at all times. (1.39)
- 2.12 DCOs should be able to see all areas of the holding room clearly. (1.40)
- 2.13 Detainees at risk of self-harm should be placed on assessment, care in detention and teamwork (ACDT) plans. Detainee custody officers should be trained in ACDT procedures. (1.42)

Childcare and child protection

- 2.14 Staff should receive training in safeguarding children. (1.46)

Facility rules

- 2.15 CCTV coverage should be extended to include the whole of the holding room. (1.59)

Complaints

- 2.16 The complaints box should be emptied daily, complaints dealt with swiftly and results communicated to detainees wherever possible. (1.63)

Services

- 2.17 There should always be a range of fresh sandwiches available to suit all diets. (1.67)
- 2.18 Hot food should be available to provide main meals at the appropriate times. (1.68)

Preparation for release

- 2.19 Detainees should be given information as early as possible about what is likely to happen to them. (1.75)

Housekeeping points

Escorts, vans and transfers

- 2.20 Advance information on any risk factors should be given to the holding room staff. (1.5)

Arrival and accommodation

- 2.21 Holding room staff should be able to control the temperature in the holding room independently of the rest of the building. (1.14)
- 2.22 Basic clothing should be available for issue and there should be a system for laundering bedding and clothing. (1.15)
- 2.23 Washing facilities should be provided. (1.16)

Legal rights and casework

- 2.24 Notices should inform detainees of active and relevant sources of legal advice, specifically the community legal advice helpline. (1.26)
- 2.25 Lengths of stay should be correctly entered in records. (1.35)

Diversity

- 2.26 Notices should be displayed explaining the contractor's commitment to equality and diversity. (1.50)

Activities

- 2.27 A planned selection of books should be available, including the languages most commonly spoken by detainees, together with current newspapers or periodicals. (1.54)
- 2.28 The television should be easily visible and audible. (1.55)

Complaints

- 2.29 Up-to-date complaints forms in English and 14 other languages should be freely available in the holding room. (1.64)

Services

- 2.30 A small amount of petty cash should be available to staff in case of urgent need. (1.69)