

# A short inspection of reporting events at Becket House Immigration Reporting Centre based on onsite observations

October 2021



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# Our purpose

To help improve the efficiency, effectiveness and consistency of the Home Office's border and immigration functions through unfettered, impartial and evidence-based inspection.

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# **Foreword**

In publishing my inaugural Inspection Plan in July 2021, I stated my intention to introduce different types of inspection to deliver a flexible and relevant programme, with increased reach across the areas I am mandated to inspect. I also stated an intention to pilot these inspections with immediate effect.<sup>1</sup>

This report is the product of the first inspection piloting the new 'short' inspections. A 'short' inspection has a focused scope, with inspectors arriving onsite within 48 hours of initial notice being given to the Home Office, and a subsequent report being shared with them 6 working days after that notification. This is a significantly shorter inspection timescale than previous ICIBI inspections, but I am confident it will result in shorter, more relevant inspection reports, covering a wider range of areas.

I have chosen this inspection of Becket House Immigration Reporting Centre as my first inspection for a number of reasons. Due to COVID-19 restrictions, the majority of individuals currently required to report are those whom the Home Office considers present the greatest potential risk of causing harm to UK society, often foreign national offenders with previous convictions in the UK. The Home Office's contact management of these individuals is, therefore, of great interest to the public as a whole. Furthermore, the activities and procedures conducted at a reporting centre are scheduled, relatively routine and subject to published guidance, allowing for a discrete inspection.

I wished to observe the collection and recording of relevant information at scheduled reporting events to compare it with the department's own expectations and to understand the event from the perspective of the user.

Overall, the inspection team observed that staff at Becket House were polite and respectful in their engagement with reportees. However, more could be done to ensure that interactions are meaningful and vital information is collected. With regards to the environment, Immigration Enforcement could make some quick wins by improving the general aesthetics of the waiting area and information services.

<sup>1</sup> https://www.gov.uk/government/publications/icibi-inspection-plan-2021-22

# 1. Background

# **Reporting events**

- 1.1 Under the Immigration Act 2016<sup>2</sup> (the Act), the Secretary of State (SoS) has the power to grant immigration bail if a person is detained or 'liable' to be detained. The Act requires at least one 'condition' to be imposed, the most commonly applied of which is the requirement to 'report' to the Home Office. The Home Office can require individuals to attend an immigration reporting centre or a police station.
- 1.2 The Home Office's Reporting and Offender Management (ROM) Team is responsible for managing ongoing contact with individuals who are required to report.
- **1.3** Staff working in reporting centres have been issued with guidance<sup>3</sup> that states:

"Reporting events allow ROM staff to undertake face to face contact with individuals, which can subsequently allow:

- the gathering of specific information caseworkers request [sic]
- appropriate and planned offers through the voluntary departures scheme
- the re-documentation process in order to secure emergency travel documents (ETDs)
- the reportee to inform counter staff of any changes in their personal circumstances"
- 1.4 Inspectors were not aware of any guidance provided to reportees on the process for attending a reporting centre; however, inspectors observed that reportees were expected to:
  - satisfy security measures to be allowed into the waiting area of the centre
  - wait to be called to the next available counter
  - attend the indicated counter and report to a member of ROM staff
  - leave the centre (if not detained as part of a reporting event)<sup>4</sup>
- 1.5 The Immigration Enforcement (IE) reporting estate is made up of 14 dedicated reporting sites which are geographically spread across the UK.<sup>5</sup> In addition, reporting takes place at c. 100 police stations across locations including: East of England, South West, South Central and Scotland.

<sup>2 &</sup>lt;a href="https://www.legislation.gov.uk/ukpga/2016/19/contents">https://www.legislation.gov.uk/ukpga/2016/19/contents</a>

<sup>3</sup> Reporting and offender management Version 3.0 https://www.gov.uk/government/publications/offender-management

<sup>4</sup> Staff guidance on the reporting process is documented in 'Manage Reporting Appointments (MRA) Operations Manual', published November 2018

<sup>5 &</sup>lt;a href="https://www.gov.uk/immigration-reporting-centres">https://www.gov.uk/immigration-reporting-centres</a>

Pre COVID-19, the number of people<sup>6</sup> required to report to a reporting centre was c.82,000.<sup>7</sup> At the time of the inspection, due to COVID-19 restrictions, there were c.11,500 people<sup>8</sup> attending reporting centres from priority cohorts.<sup>9</sup> Telephone contact has been maintained for individuals not required to report in person. On 12 July 2021, the Home Office published details of a 'telephone reporting' pilot,<sup>10</sup> whereby people would be contacted by telephone instead of being required to attend a reporting centre.

#### **Becket House – COVID-19 context**

- 1.7 Becket House is one of 3 reporting centres in London.<sup>11</sup> Pre COVID-19 footfall was c.14,859 per annum. Due to the current restrictions, opening hours have been reduced and footfall is running at c.2,400, which is 17% of normal capacity.<sup>12</sup>
- 1.8 The Independent Chief Inspector of Borders and Immigration (ICIBI) looked at Reporting and Offender Management (ROM) in 2017.<sup>13</sup> A reinspection was carried out in 2018–19<sup>14, 15</sup> which found large inefficiencies in the process and questioned how 'meaningful' reporting was.

<sup>6</sup> Home Office guidance refers to people required to attend a reporting centre as 'reportees'

<sup>7</sup> In its factual accuracy response, the Home Office said: "PRAU [Performance Reporting and Analysis Unit] is used for all formal data reporting purposes. The Pre COVID-19 population data according to PRAU was c82,000. Reporting population is defined as number of individuals with at least one reporting event in the last 6 months with the following event stats: "Completed", "No Show", "Suspended" or blank. All data relates to in-person reporting only. A different system (MIDAS) is used for internal purposes and uses a different definition for reporting purposes. The data from this system indicates the pre-COVID reporting population was c68,000. As part of a wider review of end to end reporting processes, we are looking at the issue of different definitions used for internal/external purposes with the aim of aligning these."

<sup>8</sup> Data provided by the Home Office on 10 August 2021

<sup>9 &</sup>lt;a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/987642/rom-interim-guidance-v3.0-ext.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/system/uploads/attachment\_data/file/987642/rom-interim-guidance-v3.0-ext.pdf</a>
(a) foreign national offenders (FNOs)/High Harm/Special Immigration

<sup>10</sup> https://www.gov.uk/guidance/immigration-detention-bail-telephone-reporting

<sup>11</sup> London reporting centres: Central London – Becket House; West London – Eaton House; South London – Lunar House

<sup>12</sup> Data provided by the Home Office on 10 August 2021

<sup>13</sup> https://www.gov.uk/government/publications/inspection-report-on-the-reporting-and-offender-management-system

<sup>14</sup> https://www.gov.uk/government/publications/a-re-inspection-of-the-home-offices-reporting-and-offender-management-processes-and-of-its-management-of-non-detained-foreign-national-offenders

<sup>15</sup> https://www.gov.uk/government/publications/response-to-a-re-inspection-of-reporting-and-offender-management-processes-and-management-of-non-detained-foreign-national-offenders

# 2. Recommendations

- **2.1** The Home Office should revisit the purpose and scope of a reporting event to ensure information is proactively and routinely collected and recorded.
- 2.2 The Home Office should ensure that Becket House Immigration Reporting Centre meets the infrastructure general provisions as set out in the guidance, <sup>16</sup> and furthermore, look to improve the overall service user experience, including but not limited to:
  - ensuring signage and posters are up to date and include the correct Home Office branding
  - ensuring all countertop equipment works correctly, including the dual way intercom system, and remove decommissioned or extraneous equipment
  - improving the overall condition and appearance of the waiting area
  - ensuring there is an adequate complaints procedure in place with easily accessible forms, appropriate signage and a complaints box available in the waiting area

# 3. Scope and methodology

- **3.1** This inspection focused on the effectiveness of reporting events, including:
  - the service user experience
  - · the collection and recording of relevant information by Home Office staff
- **3.2** Becket House also has a short-term holding facility (STHF) which was not within the scope of this inspection.<sup>17</sup>
- 3.3 Inspectors attended Becket House Immigration Reporting Centre on 11 and 12 August 2021 to conduct onsite observations of its day-to-day operation and management. Inspectors also spoke to Home Office staff and managers on duty on these dates.

# 4. Key findings

# Service user experience

4.1 Overall, Becket House Immigration Reporting Centre provides a functional, clean and safe place for in-person reporting where inspectors observed that reportees are treated respectfully by staff. However, the general appearance of the reporting centre is run down and appears to have suffered from a lack of maintenance; it is likely that this is, in part, due to the reporting centre moving out of Becket House in March 2022. There are some basic improvements that should be made to the waiting area, such as updating signs and removing defunct equipment.

#### **COVID-19 impact**

- 4.2 The introduction of an automated reporting system in 2019 saw reportee waiting times drastically reduce. The previous ICIBI inspection report, published in 2019, noted that "Managed Reporting Appointments (MRA)<sup>18</sup> had reduced the time reportees spend at the counter, from an average nationally of 6 to 8 minutes to approximately 20 seconds". Since March 2020, in response to COVID-19, reporting centres have reduced face-to-face reporting, increased telephone contact, and moved some administrative procedures from counter staff to remote workers. This has contributed to further reductions in the time spent by reportees in reporting centres.
- 4.3 In order to adhere to social distancing requirements, every other counter is cordoned off at Becket House. This, along with a reduction in the number of reportees attending the centre, has allowed for a proportion of staff to complete administrative work remotely, which otherwise would have been conducted at the counter.
- 4.4 Inspectors observed physical measures in place, in response to COVID-19 for those attending, including a one-way system for reportees; cordoning off the public seating area; cordoning off every other counter; social distancing signage; and hand sanitiser stations. All staff demonstrated personal responsibility in keeping themselves and reportees safe, and it is likely this is due to the example set by the management team who clearly make the safety of staff and reportees a priority.

#### **Facilities**

**4.5** Home Office guidance<sup>20</sup> dated March 2019, sets out the general provisions covering the infrastructure of a reporting centre:

<sup>18</sup> The Manage Reporting Appointments (MRA) tool, which has now been rolled out across the UK, will allow the teams in reporting centres to spend more meaningful time with people who are new to reporting, to discuss and identify any issues of concern or changes in circumstances" – <a href="https://www.gov.uk/government/publications/response-to-a-re-inspection-of-reporting-and-offender-management-processes-and-management-of-non-detained-foreign-national-offenders">https://www.gov.uk/government/publications/response-to-a-re-inspection-of-reporting-and-offender-management-processes-and-management-of-non-detained-foreign-national-offenders</a>

 $<sup>19 \ \</sup>underline{\text{https://www.gov.uk/government/publications/a-re-inspection-of-the-home-offices-reporting-and-offender-management-processes-and-of-its-management-of-non-detained-foreign-national-offenders}$ 

<sup>20</sup> Reporting and offender management Version 3.0 https://www.gov.uk/government/publications/offender-management

- "the ROM centre will be clean with furniture in good repair
- there will be access to toilets
- there will be easy access for mobility-restricted visitors
- ideally there will be a multi-faith room and baby feeding facility available
- counters will be clear of extraneous items"
- 4.6 Inspectors found that the public area, toilets and baby changing facilities were clean and tidy. Counters in the reporting centre consisted of a glass screen between the counter staff and reportee and wooden panels between the individual counters, providing a degree of privacy for the reporting event. Each counter had a telephone and a biometric enrolment device on the public side of the counter; however, inspectors were told that these had not worked for "years" and had been disconnected.<sup>21</sup> Similarly, a television on the wall and the counter dual way intercom system did not work.
- 4.7 Some walls in the reporting centre had peeling paint and plaster, all walls had numerous scuff marks and there was vegetation growing on the exterior of the windows, blocking light transmission, adding to the overall feeling of neglect.
- **4.8** Physical measures in place for mobility-restricted visitors included ramp access at the entry point, a lower level counter and toilets with disabled access.
- 4.9 Inspectors observed that there were sometimes difficulties for staff and reportees to hear each other, especially if either were softly spoken and wearing a face covering due to COVID-19. This was exacerbated by the counter dual way intercom system not working.
- **4.10** The reporting centre does not have a multi-faith room.

# **Reporting process**

#### **Entry**

- **4.11** The entrance to the building is guarded by Mitie Security contractors. Security staff wear a uniform consisting of a black stab proof vest (identification numbers on epaulettes but no name badges), polo shirt, trousers and shoes or boots. The company logo on the uniform was obscured by the stab proof vest.
- 4.12 Inspectors noted that there was no physical contact between security staff and reportees at any time. Security staff were polite, friendly and professional, helping to create a calm, quiet environment. They assisted reportees with information when asked, and on occasion handed out a 'Useful contacts' form. The flow of reportees from security checks to counters was smooth, security staff ensured that reportees adhered to social distancing and alerted counter staff to the presence of people in the queue. Inspectors observed that the queue outside the reporting centre was never longer than 5 people. This was only the case when the reporting centre had reached its COVID-19 capacity of 8 reportees in the waiting area.

<sup>21</sup> Inspectors were told that the counter biometric enrolment device had been decommissioned and had previously been part of the application registration card (ARC) system. ARC is a credit card-sized plastic card issued by the Home Office to individuals who claim asylum.

#### **Waiting area**

- 4.13 There were no complaints boxes or forms in the waiting area of the reporting centre (forms were available behind the counters but would have to be requested by the reportee). There was a holder in the public area for complaint forms, but this contained leaflets for a 'Reintegration Support Project' rather than complaints forms. There was a suggestion box, but no suggestion forms were available that could be completed by the reportee.
- 4.14 There were posters and leaflets containing information that may be useful to a reportee, including posters on child sexual exploitation, modern day slavery, and assistance and advice on voluntary returns. Some posters were out of date or unbranded and inspectors noted two posters with UK Border Agency (UKBA) branding, an agency that was replaced by UK Visas and Immigration in 2013.<sup>22</sup> There appears to be a lack of oversight or responsibility for the information displayed to the public.

#### **Counter interaction**

- 4.15 Reportees were treated respectfully by Home Office staff throughout the reporting event. Due to the nature of reporting, counter staff may have seen the same reportee on a weekly basis for several months which allowed for friendly exchanges between reportees and staff. Counter staff told inspectors that when people report they may be angry or frustrated by the process or their case, and explained that part of their role is to allow the reportee the opportunity to "get it off their chest".
- 4.16 However, another member of staff informed inspectors that as a response to COVID-19 they needed to minimise the amount of time reportees spent at the counter, and ultimately in the reporting centre. This was borne out in inspectors' observations of very brief exchanges that did not allow for meaningful interactions. During one observation, a reportee requested further information regarding a document they needed to complete but was told almost immediately to go to their solicitor instead. This was overheard by the on-duty manager who approached the reportee and quickly established that it was an action that the staff at the reporting centre were able to complete.
- Questions from reportees were often about the progress of their case, whether correspondence had been received by the Home Office, or about reducing their frequency of reporting. This then prompted counter staff to interrogate the reportee's case on the Case Information Database (CID) to see if they could answer the question. Where they could not, the member of staff provided an email for the reportee to write to the relevant team to obtain an answer. Emails for different reporting centres and case workers were provided in the form of slips of paper, which were not immediately accessible at the counter, for handing out to reportees. In other instances, the staff member provided a telephone number for the reportee to use; for example, if they were not able to attend a reporting event.

# Collection and recording of relevant information by Home Office staff

#### **Collection of information**

- 4.18 Each reporting event was an opportunity to confirm that reportees' personal circumstances had not changed, but inspectors noted that counter staff did not routinely ask reportees whether this was the case. This is particularly important as high-risk individuals, including foreign national offenders (FNOs), 'High Harm', and those identified for removal, are currently required to report face-to-face at the reporting centre.
- 4.19 At the counter, most interactions between the counter staff and reportees were very brief. After a short greeting, once the bail form had been scanned, if there was no reason flagged on the Managed Reporting Appointments (MRA) for them to be spoken to further; for example, for an interview for an Emergency Travel Document (ETD) or Detention on Reporting (DoR), reportees were informed when they needed to report next, and allowed to leave.
- 4.20 Counter staff did not routinely ask if there had been any change in a reportee's personal circumstances, such as confirming whether their mobile telephone number had changed. There was seemingly a reliance on the reportee informing counter staff without being prompted.
- 4.21 Inspectors observed difficulties in communication between counter staff and reportees. Staff were having to talk loudly to be heard. Inspectors observed counter staff lifting the Perspex flap, used when passing documents through, to hear the reportees better. When asked, staff were unsure whether the counter window dual way intercom system was working. On further investigation it appeared they were not as the power light to the system was off.<sup>23</sup>

#### **Case studies**

**4.22** The following case study is an example of a lack of proactive questioning and recording of a significant change in a reportee's personal circumstances.

#### Case study 1: Collection of information and intelligence.

A reportee attending had the barcode on his bail form scanned and his details appeared on the monitor. There was no intervention flagged on the system for further action and the staff member concluded the conversation saying, "see you in two weeks". The reportee then informed the staff member that he no longer lived at the address on the form. The reportee was asked if he was paying rent and replied he was now living with a family member. He was asked to bring a copy of the mortgage deed for the property and a letter confirming that he was allowed to live there the next time he came in to report. This is in line with the Home Office guidance on change of address. However, he was not asked for the address and a record of the conversation was not made. The staff member explained to the inspector that the new address would be logged when the paperwork requested was received. This was a missed opportunity to record the reportee's new address, which had been volunteered and which could provide vital intelligence for the Home Office and other enforcement agencies.

- 4.23 Inspectors were told by counter staff that the emphasis was on completing the reporting event without delay. If there are no planned interventions, staff may not be inclined to ask questions that could reveal wider concerns, such as safeguarding.
- **4.24** The following case study is an example of a lack of questioning about a child accompanying a reportee.

#### Case study 2: Safeguarding

A female reportee came to the counter with a pre-school-aged child who appeared happy and well. The bail form was scanned and as there was no intervention needed, they both left after the staff member said "thank you". While there were no apparent concerns about the welfare of the child, the staff member did not ask the reportee any questions about the child, such as their identity and who has parental responsibility for them. It was explained to the inspector that "we did ask more questions before MRA was introduced two years ago."

4.25 When this was raised with managers at Becket House, they told inspectors that staff should be asking questions about changes to circumstances and using the reporting event as an opportunity to identify safeguarding issues.<sup>24</sup> They accepted that staff had the time to make the interactions meaningful and at the very least should be confirming telephone numbers.

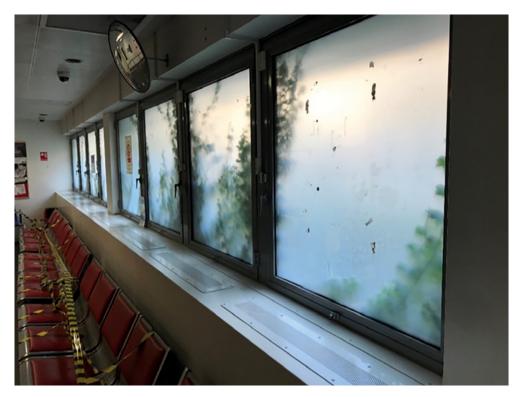
#### **Recording of information**

- 4.26 Inspectors observed very little evidence of the recording of data and information. Since COVID-19, the reporting centre has introduced a 'buddying' system. This was to allow the reduction in the number of staff attending the reporting centre, in line with COVID-19 restrictions. Staff at the counter could message a buddy working remotely, via instant messenger, for the buddy to complete any required actions on the case, including recording data and information. Inspectors were not able to observe the buddy role and the subsequent recording of data.
- 4.27 Added to this, overall, the general proactive collection of information from the reportees was minimal, with additional questions only being asked if required and/or prompted by MRA. Information that may have required recording was often offered voluntarily by the reportees. Inspectors did not witness the recording of that data or information.

<sup>24</sup> In its factual accuracy response, the Home Office said that: "Home Office officials have subsequently confirmed that staff have completed safeguarding training and this includes identifying specific signals or concerns as part of the reporting process that may require further questioning or investigating. This would include referring a case to a duty manager."

# **Annex A: Photographs**

Inside Becket House Immigration Reporting Centre





Becket House Immigration Reporting Centre counter



Complaints form holder



#### Posters in public area



# Annex B: Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48–56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on her behalf. The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions. In particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum Act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on section 19D of the Race Relations Act 1976 (c. 74) (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints; and
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to her in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which she has committed to do within eight weeks of receipt, subject to both Houses of Parliament being in session.

Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

# Acknowledgements

Staff at Becket House Immigration Reporting Centre

# **Inspection team members**

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