



# A re-inspection of the initial processing of migrants arriving via small boats, including at Western Jet Foil and Manston

January – February 2023

**David Neal**

Independent Chief Inspector of  
Borders and Immigration



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# Foreword

In an inspection last year of the initial processing of arrivals at Tug Haven and Western Jet Foil, I found that the Home Office's performance in delivering an efficient and effective response to the challenge posed by the increasing volume of migrants arriving via small boats was poor. I therefore indicated my intention to carry out a reinspection of this area in my inspection plan for 2022-23.

Since my last inspection concluded in February 2022, much of the initial processing activity for small boat arrivals has been transferred to a new short-term holding facility at Manston. When I visited that site in October 2022, I found that the facility and its staff were at breaking point, with too many people being held there for too long, in conditions that were inadequate and unsafe. On 8 December 2022, I received a commission from the Home Secretary to include as part of my planned reinspection an assessment of the situation at Manston and of steps taken there to address concerns arising from my visit.

Overall, I was encouraged to find in this inspection that the performance of the Home Office has improved since my first inspection of operations at the port of Dover and since my visit to Manston. At the same time, the department must not succumb to complacency, as much work remains to be done. Systems and procedures for the initial processing of arrivals appeared to be working much better than during the previous inspection as a result of the shift to Manston, which has more space that can be used more flexibly than Western Jet Foil. However, it is highly doubtful that the facilities and processes in place at present would be sufficient to handle the large numbers of people expected over the coming weeks and months.

In light of the seriousness of the concerns I raised in my last inspection report and following my visit to Manston last autumn, it is worth highlighting the significant positive findings of this inspection. It was clear that considerable efforts have been made to improve the infrastructure and capacity for processing at Manston, and that real and tangible improvements have been implemented across a range of areas, including welfare support, initial health screening, and communications with migrants.

At the strategic level, I was pleased to see that the call I made, more than a year ago, for the Home Office to move from a crisis response to a steady-state response has been heeded. There is now an acceptance of the world as it is rather than as one might hope, which is a fundamental and hugely important change. Structures have been put in place that provide clear accountability and strong, visible leadership. Responsibility for the department's small boats response now sits with senior officials who have the key skills and experience necessary to run an operation of this size, complexity, and importance to the country.

The challenge for the department now is to maintain and consolidate this progress, as the picture is not all positive, and serious risks remain. Though a relatively small number of arrivals was flowing smoothly through the Western Jet Foil and Manston sites at the time of this inspection, the capacity is not in place to process a large number of people arriving over a short period of time, particularly if – as might well be expected – sufficient onward accommodation is not immediately available. This difficulty is



exacerbated by the lack of end-to-end ownership of the asylum process, with the officials responsible for the initial processing of small boat arrivals having no control over, or insight into, arrangements for accommodation for those leaving Manston. Further expansion plans, including the opening of a residential holding room facility where arrivals can be detained for up to 96 hours, are being implemented to build greater resilience, but these will take several months to become operational, and when they do, they will not have been tested by challenging numbers.

There remains a very real danger, then, that a shortfall in the capacity of the accommodation estate will see numbers in Manston build up, with a return of unacceptable conditions resembling those seen in October 2022. I have received no clear answer from senior officials as to where the 55,000 to 85,000 people expected to arrive in 2023-2024 will be accommodated. I do not think that anyone knows yet. This is a considerable risk. The Home Office will therefore need to satisfy itself that it has contingency plans and risk mitigation measures in place to cope with increases in numbers.

Adequate staffing – a workforce that is appropriately qualified, trained, and led – will also be essential to meet the challenges of the coming months. While I was pleased to see that the staffing situation has improved since my first inspection, I am concerned that plans for further recruitment may be hampered by the inefficiency of Civil Service hiring processes and by the tightness of the labour market in the region. In its efforts to bring more staff on board, the Small Boats Operational Command is already in competition with other areas of the Home Office, with contractors, and with other employers for a limited pool of eligible potential workers. I do therefore worry that the department will be insufficiently agile to recruit and train the numbers it requires in order to respond safely and humanely to the volume of small boat arrivals that is expected over the medium term.

A very serious concern is that the data which the Home Office collects, and upon which it relies, as it carries out the initial processing of small boat arrivals, remains “inexcusably awful”, as I said in my last inspection report. Though data remains woeful, what has changed is a new command team who accepts this and is determined to bring some rigour and honesty to the realities of a really complex, challenging summer ahead. The collection and maintenance of consistent, accurate, and reliable data will be vital in underpinning a continued focus on the identification of vulnerable migrants – a focus that must be maintained even when numbers increase, pressure rises, and specialist staff are stretched.

More broadly, I worry that, having failed to transfer learning from the Penally/Napier experience to the development of the Manston facility, the Home Office may now fail to apply the lessons that it has learned, painfully slowly, from its experience at Manston to wider work now taking place to bring additional non-detained accommodation online and to expand the detained estate. The Home Office has a brief window of opportunity to draw together its hard-won experience into future accommodation solutions.

These areas of significant concern notwithstanding, I am encouraged by what I have seen in this inspection. I have witnessed at first hand grip, compassion, openness, a willingness to face up to reality, and a preparedness to speak truth to power. Vital elements that were not in place 12 months ago – including the development of comprehensive plans and a robust leadership framework – are now in evidence. While the forecast for arrival numbers for this year points to challenges ahead, I am more confident that the Home Office has started to get its act together. I intend to revisit Manston when it is busier and inspect its operations during 2023.

The elephant in the room is why has this taken so long to address. More than four years after small boats began arriving regularly on the south coast, there is only now any sense of the kind of planning and operational delivery I would expect to see.

This report makes three recommendations and was sent to the Home Secretary on 4 April 2023.

A handwritten signature in black ink, appearing to read 'David Neal', with a horizontal line underneath the signature.

David Neal  
Independent Chief Inspector of Borders and Immigration

# 1. Key findings

## Introduction

- 1.1** The processes and infrastructure inspectors observed at Western Jet Foil (WJF) and Manston are a significant upgrade on those seen in early 2022, and further improvements have been made since the Independent Chief Inspector of Borders and Immigration’s visit to Manston in October 2022. However, the Home Office’s progress towards implementation of the recommendations from the previous inspection, all of which were accepted in July 2022, “without demur”, was not as advanced as might have been expected.<sup>1</sup>

## Leadership

- 1.2** There is now considerably more senior leadership capacity in place to drive improvement, but it has not yet been stress-tested during a period in which the volume of arrivals matches the level of autumn 2022. As the leadership structure is very new, there is still work to do to clarify the split of responsibilities and lines of communication between the two new main commands.
- 1.3** A 2024+ vision for the Manston facility is in development, but there is not yet a clear strategy and delivery plan for small boat operations, setting out what key outcomes are to be delivered and by when.

## Security

- 1.4** The Home Office now ensures that all migrants have their biometrics enrolled prior to leaving Manston, which was not happening previously, and only a designated senior manager is able to authorise suspension of enrolment.
- 1.5** While they are simple to use and improvements have been made, there are still reliability issues with Biometric Recording Stations (BRSs), as well as limited processing lanes, which can contribute to delays in the throughput of migrants.
- 1.6** There have been some improvements in the handling and management of migrants’ property, including closer working with the police and Home Office intelligence officers on searching of migrants’ belongings. However, at times of high migrant arrivals in crowded areas, this was not always the case, and staff said they were not always aware of the up-to-date intelligence picture and what was expected of them.
- 1.7** Inspectors also noted a large number of migrant property bags, which included mobile phones, that had not been reunited with their owners, potentially preventing them from contacting

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<sup>1</sup> Independent Chief Inspector of Borders and Immigration, ‘An inspection of the initial processing of migrants arriving via small boats at Tug Haven and Wester Jet Foil, December 2021 - January 2022’ (published 21 July 2022). <https://www.gov.uk/government/publications/an-inspection-of-the-initial-processing-of-migrants-arriving-via-small-boats-at-tug-haven-and-western-jet-foil-december-2021-january-2022>

their family or friends. Plans for an electronic solution to ensure migrants do not leave Manston without their belongings are at an early stage.

## Vulnerability

- 1.8** The Home Office has taken positive steps to improve staff awareness of the importance of identifying and recording migrant vulnerabilities, including the introduction of a safeguarding process map and referral form. However, the efforts of the new Small Boats Operational Command (SBOC) safeguarding team are hampered by limited available training resource, overstretched staff at WJF with limited capacity to assess vulnerabilities when arrival numbers are high, and underdeveloped reporting mechanisms. Consequently, vulnerable migrants may be leaving Manston without adequate provision for safeguarding concerns, and the Home Office was unable to provide any data to reassure inspectors that this was not the case.

## Data

- 1.9** Inspectors found that senior managers exhibited a sharper awareness of the importance of effective data collection and use, relative to the time of the 2022 inspection. However, inspectors observed a shifting and unclear data strategy and concluded that activities to assure and integrate data remained immature.
- 1.10** Inspectors noted in particular the continuing lack of a single, reliable system of collecting, recording, and accessing data, and, while helpful steps have been taken, there is still a need for greater clarity regarding data ownership. Weaknesses in these areas have widespread effects across migrant processing and aggravate the strains on an already burdened operation.

## Staffing

- 1.11** Many staff and contractors working at WJF and Manston have, over an extended period, shown dedication, resilience, and compassion in extremely challenging circumstances. However, some new recruits feel ill-prepared, with no shift briefings, and long delays in accessing essential training – including the required level of personal safety training – and in obtaining equipment, including stab vests and handcuffs.
- 1.12** The Home Office has reviewed and modified its staff stand-up levels to better reflect forecasted arrival numbers. While the move to rely solely on Border Force staff has its benefits, including a larger and more flexible resource pool to draw from, there are considerable challenges with training, which will impact on SBOC's ability to process migrants at pace. SBOC's success will be dependent on receiving the right amount of resource, with the necessary skillset, at the required time. The intention to provide a staff canteen and gym is an attempt to improve facilities and may assist with staff retention and welfare. However, the Home Office's ability to recruit at pace remains a significant hurdle given a highly competitive market and typically long timescales for obtaining security clearances.

## Asylum screening interviews

- 1.13** The fact that asylum screening interviews now take place at Manston represents an improvement on the situation at the time of the 2022 inspection, when no such interviews were being undertaken at WJF. However, only 20 to 30% of migrants who pass through Manston receive an asylum screening interview before departing. This is due to a lack of staff,

delays, blockages, and failures of communication at several points in the process at Manston. When coupled with the apparently high rate of absconding from hotels, this could mean that vulnerability and/or security risks are not being detected and addressed.

## Developments at Manston since October 2022

- 1.14** Due to the significant difference in the volume of migrants at Manston at the time of the Independent Chief Inspector's October 2022 visit and the 2023 reinspection, a direct comparison of conditions could not be made. In spite of this, inspectors noted several improvements had been made at Manston.
- 1.15** Migrants were only being held in purposely designed marquees, which were being replaced with sturdier versions. Catering facilities had developed from 'burger van'-type food to more nutritious and culturally appropriate provision. On the day of the Independent Chief Inspector's visit to Manston on 24 October 2022 a doctor (who was an emergency department specialist) was onsite full-time, and three months on, medical support had been enhanced with the addition of further emergency department specialists. Inspectors did not observe migrants' property bags being placed in unsecured areas, as was previously the case, although senior managers accepted it remained a challenge to ensure that migrants leave Manston with all of their property.
- 1.16** Inspectors also observed the site in general was cleaner and the marquees were warm, dry, and clean.

## 2. Recommendations

### Recommendation 1 – Strategy

Publish a strategy for the Small Boats Operational Command/the processing of small boat arrivals, covering Western Jet Foil and Manston, in consultation with stakeholders, which incorporates:

- a. the ongoing work to develop a 2024+ vision
- b. clear exposition of the command and control of the operation, including clarity on responsibility, accountability, and authority (RA2)
- c. the Manston Recovery Plan
- d. the risks and mitigations to operations associated with high inflow (numbers of arrivals) and low outflow (insufficient asylum accommodation)
- e. the resources required to deliver an effective operation, including staffing levels for contractors and for Home Office staff
- f. clear milestones and deliverables
- g. a robust process for review of the strategy

### Recommendation 2 – Data

Develop a data strategy for the small boats operation which:

- a. defines the data needs, including coverage of areas such as vulnerability, safeguarding, security, detention, and asylum screening onsite
- b. assures the quality of data in line with government guidelines<sup>2</sup>
- c. incorporates developments to IT systems to provide data that is accurate, consistent and reliable
- d. is supported by guidance for staff on recording, reporting, and sharing data internally and with the appropriate agencies

### Recommendation 3 – Training

Conduct a training needs analysis for SBOC operations to produce a comprehensive training and development plan. This should cover all existing and new staff and contractors, and incorporate:

- a. vulnerability and safeguarding
- b. security and intelligence

<sup>2</sup> Government Data Quality Hub, 'The Government Data Quality Framework' (published 3 December 2020). <https://www.gov.uk/government/publications/the-government-data-quality-framework/the-government-data-quality-framework#why-do-we-need-a-data-quality-framework>

## 3. Background

### Irregular migration by small boat

- 3.1** Before November 2018, the number of migrants entering the UK irregularly from Europe by small boat had never exceeded ten in any calendar month. In November 2018, 110 migrants arrived in the country by this method, and in December 2018 this number further increased to 138. In response, later that month, the then Home Secretary Sajid Javid declared a “major incident” and appointed a Gold Commander dedicated to the control of, and response to, migrant arrivals by small boat.
- 3.2** Following the appointment of a Clandestine Channel Threat Commander in August 2020, the Clandestine Channel Threat Command (CCTC) was created, which aimed to “save lives and secure the UK border by ending the viability of the small boats route”.<sup>3</sup> The CCTC Campaign Plan, which guided the command, included five objectives: “Reduce supply”, “Disrupt Organised Crime Groups”, “Deny crossings”, “Deter migrants”, and “Control arrivals”.<sup>4</sup>
- 3.3** Up until January 2022, all processing of migrants arriving by small boat took place at Tug Haven in the Port of Dover. The site consisted of a large, heated marquee with capacity to hold approximately 400 individuals. The Home Office recognised that this provision was inadequate for the scale of small boat arrivals and for conducting the necessary processing. Furthermore, the site was not sufficiently secure, nor was it capable of meeting migrants’ welfare needs. On 17 January 2022, Tug Haven closed, and a new site, Western Jet Foil (WJF), was opened some 50 metres away for the purpose of migrant processing. This new facility comprised a large modular building with a capacity of 250 migrants.
- 3.4** The Independent Chief Inspector of Border and Immigration (ICIBI) undertook an inspection of Tug Haven and WJF from December 2021 to January 2022.<sup>5</sup> The inspection found that the Home Office had not transitioned from “an emergency response to a steady state” and these sites were unfit to deliver the security, welfare, and processing functions required of them. Furthermore, inspectors found the operation’s data collection and migrant-processing activity to be inadequate, creating several security and welfare risks and issues. Inspectors observed CCTC to be overstretched, lacking leadership and governance processes, and being pulled between operational and strategic activities.

### Events since the 2022 inspection

- 3.5** Following the 2022 inspection, irregular migration to the UK by small boat remained a high-profile operational and political issue. The number of migrants entering the UK by this method continued to increase, as shown in figure 1.

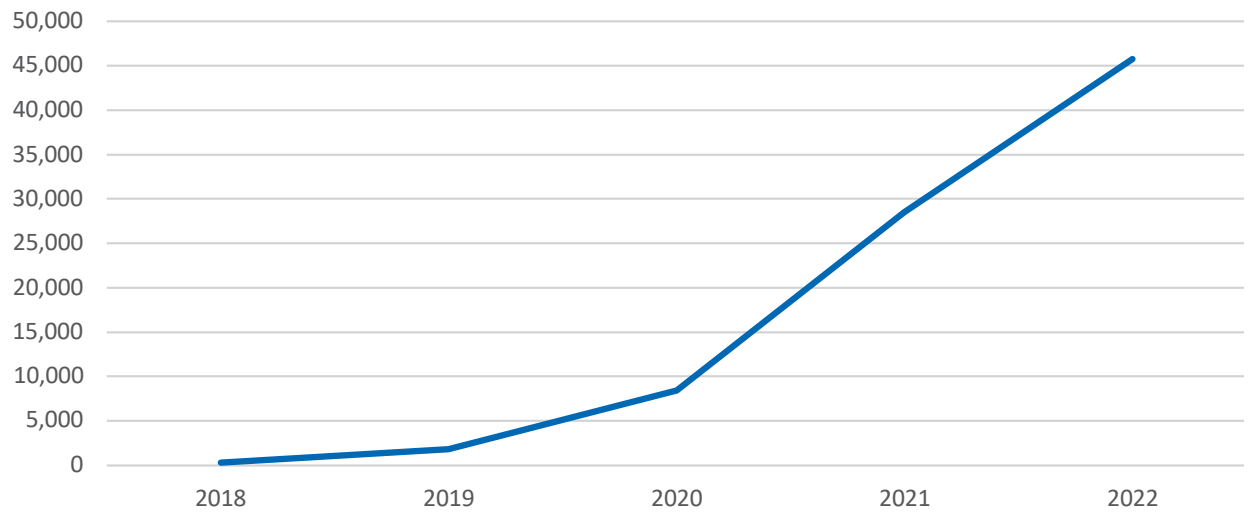
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<sup>3</sup> ICIBI, ‘An inspection of the initial processing of migrants arriving by small boats’.

<sup>4</sup> ICIBI, ‘An inspection of the initial processing of migrants arriving by small boats’.

<sup>5</sup> ICIBI, ‘An inspection of the initial processing of migrants arriving by small boats’.

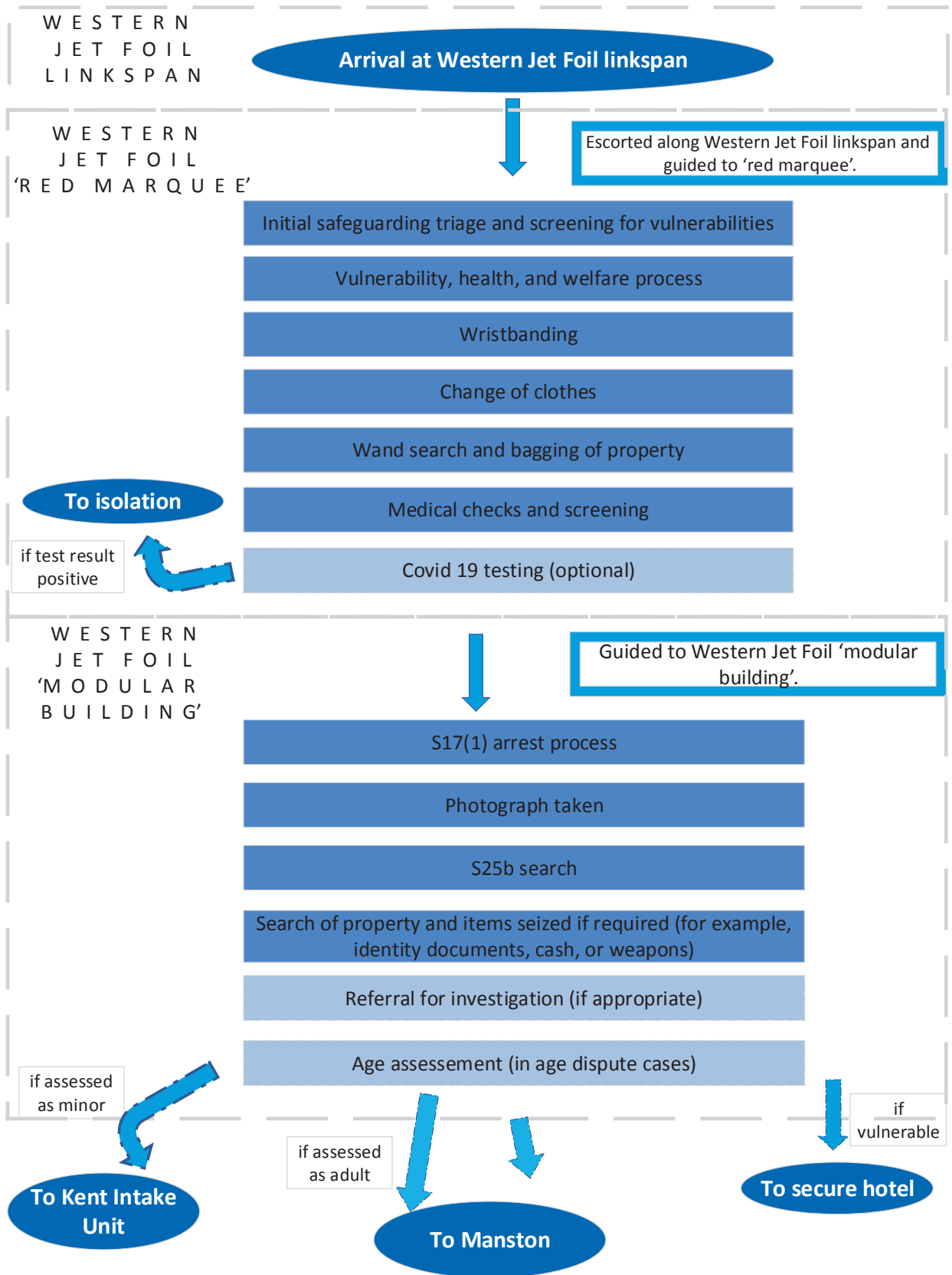
**Figure 1: Migrants arriving in the UK by small boat each year from 2018 to 2022**



**3.6** The landside response to these arrivals, meanwhile, changed greatly following the 2022 inspection. After the closure of Tug Haven, small boat arrivals were brought ashore at WJF, where initial disembarkation and reception activities were relocated. Figure 2 shows the safeguarding and migrant processing steps now undertaken at WJF.



**Figure 2: Safeguarding and migrant processing steps at Western Jet Foil**

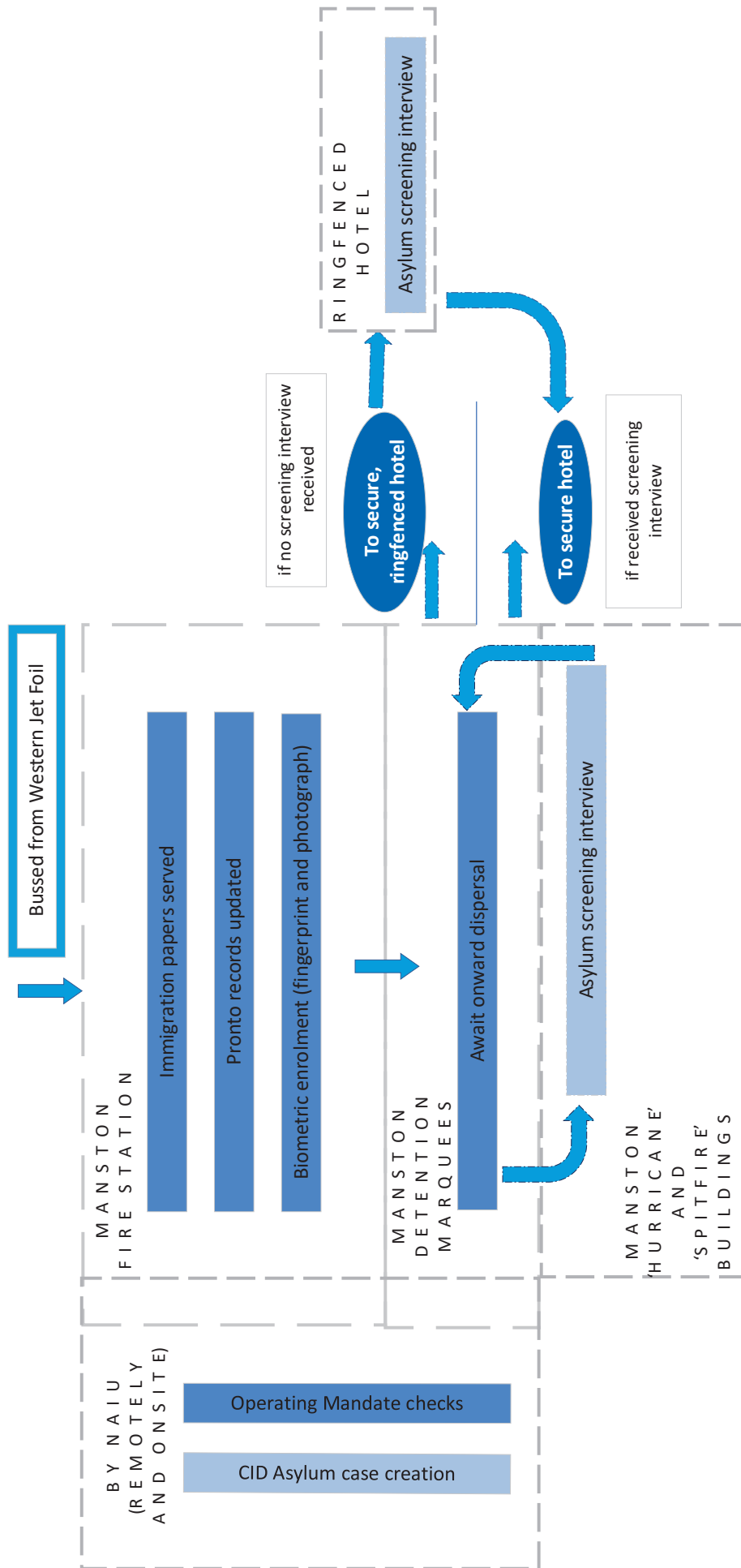


**3.7** In February 2022, a new site was opened at Manston, 22 miles north of the Port of Dover. This is a far larger site intended to provide a location for initial migrant processing, triage, and detention prior to dispersal into longer-term accommodation. Manston, the former Defence Fire Training and Development Centre, has a large hall – previously a fire station – in which

initial aspects of migrant processing, such as biometric enrolment, are completed. Once processed, migrants are moved into one of several non-residential short-term holding rooms (marquees) having been formally detained under paragraph 16 of the 1971 Immigration Act (as amended) as a person who is liable to examination or removal. The Manston site also features a medical facility and buildings in which asylum screening interviews are conducted.

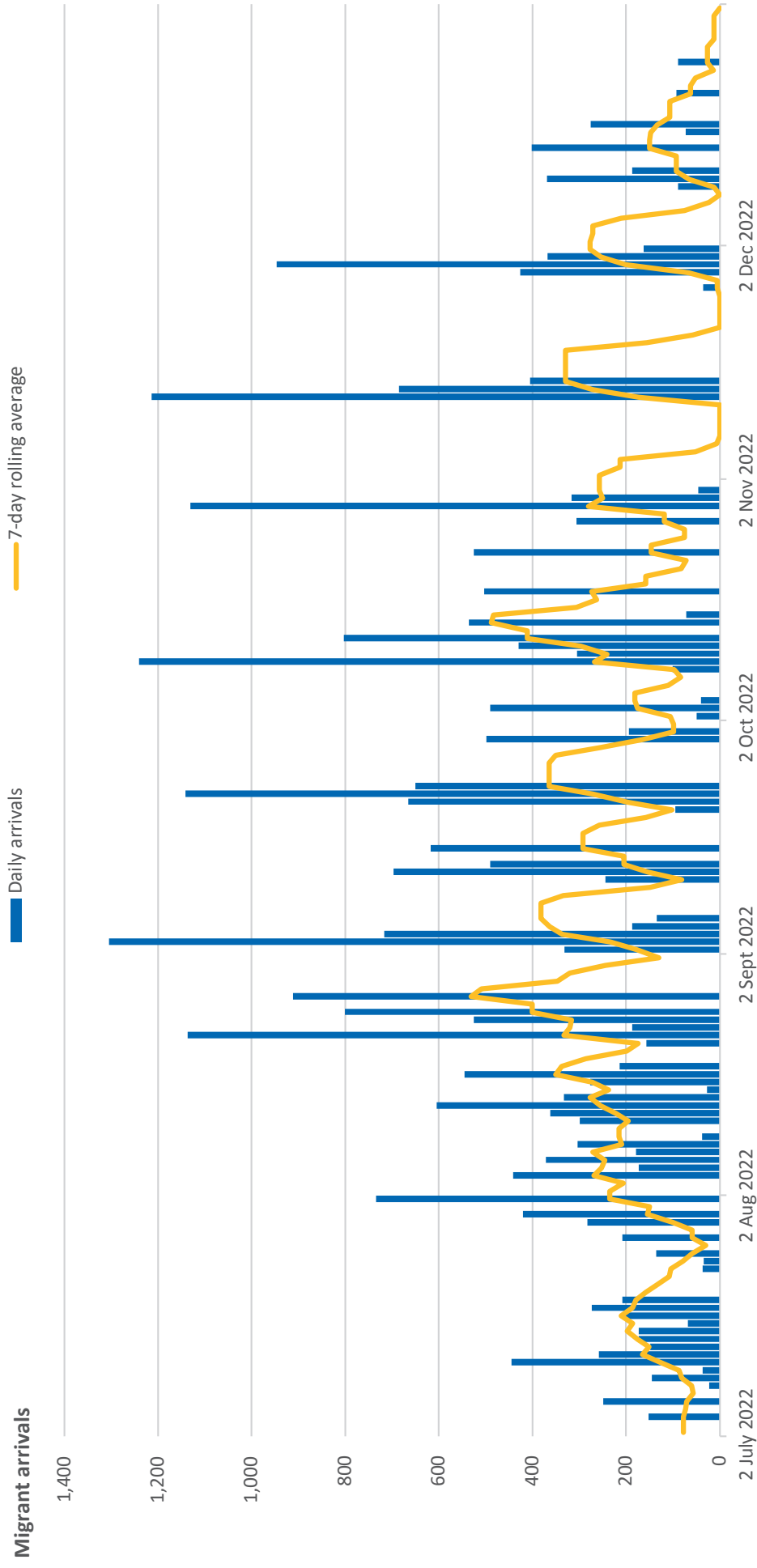
**3.8** Figure 3 shows the migrant processing activity conducted onsite at Manston and remotely by the National Asylum Intake Unit (NAIU). Processing steps and dispersal locations differ significantly for those migrants who claim asylum while at the facility – who represent the vast majority of those sent there – and those who do not. See chapter 10, ‘Inspection findings: asylum screening interviews’ for details of the processing of those not claiming asylum.

**Figure 3: Migrant processing steps at Manston**



- 3.9** In November 2021, the cross government Illegal Migration Taskforce (Cabinet Office) was formed and announced that the Ministry of Defence (MoD) would take over from the Home Office primacy for operational control of migrant arrivals. This took place in April 2022. However, the MoD's involvement was restricted to command and control (C2) and logistic roles. MoD primacy came to an end on 31 January 2023 when the Home Office resumed operational leadership.
- 3.10** The Independent Chief Inspector visited Manston in April 2022. He noted the much larger size of that facility relative to Tug Haven and WJF and the concomitant increase in processing capacity across the active sites. However, he had concerns that the facility was not sufficiently resourced and that there was a continued lack of overall leadership on the Manston site and within the response to small boats.
- 3.11** Following this visit, in late summer and autumn of 2022, arrivals by small boat reached very high levels, as shown in figure 4. As arrivals increased, insufficient outflow of migrants led to Manston's population greatly increasing. Already in August 2022, senior leadership on the site felt there were insufficient staff available to guard migrants. The facility began to exceed its capacity by September 2022. At its peak, the population of Manston reached 4,040.

**Figure 4: Number of migrants arriving by small boat from July to December 2022**



- 3.12** Concerned by reports of poor conditions at Manston, the Independent Chief Inspector made a further visit to the facility on 24 October 2022. At that time, there were 2,800 migrants onsite, and its capacity had been increased through the bringing into service of more marquees and habitable buildings across the site. Many detainees had been held on the site for weeks, with one family having been at Manston for 32 days. The Independent Chief Inspector was particularly concerned to hear that Detention Custody Officer (DCO) resource was far below that needed to run the site safely, and that some detention areas of the site were completely without DCO staff.
- 3.13** On 26 October 2022, a session of the Home Affairs Select Committee (HASC) attended by the Independent Chief Inspector focused considerable attention on conditions at Manston. The Independent Chief Inspector expressed fears that Manston was no longer “safe” or being “run properly”.
- 3.14** On 30 October 2022, an attack at WJF using a number of crude incendiary devices led to the evacuation of the site.
- 3.15** The Immigration Minister, Rt Hon Robert Jenrick MP, later acknowledged in Parliament that there had been “serious concerns about conditions” at Manston “and, indeed, about its legality” when he took up his post on 25 October 2022.<sup>6</sup> He pledged to “bring Manston to a sustainable footing and meet our legal and statutory duties”. On 23 November 2022, in response to an urgent question, the minister confirmed that Manston was empty, and in a statement on 28 November 2023 he said: “The site is operating legally now.”<sup>7</sup>

## This reinspection

- 3.16** Tug Haven is no longer operational, and the present ‘two-site’ model broadly tasks WJF with ‘Safety of Life at Sea’ (SOLAS) and reception activities, and Manston with processing and short-term detention prior to dispersal. In December 2022, CCTC itself was transformed into the Small Boats Operational Command (SBOC), and this was transferred from the Immigration Enforcement directorate into Border Force. In the same month, the number of Ministry of Defence personnel deployed to WJF and Manston was reduced from 25 to two. During the onsite phase of this inspection, the Ministry of Defence presence within the small boats response was withdrawn entirely. SBOC, meanwhile, was seeking to satisfy a higher proportion of the staffing needs across WJF and Manston itself and aimed to recruit over 700 new staff.

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<sup>6</sup> TheyWorkForYou, Hotel Asylum Accommodation: Local Authority Consultation – in the House of Commons (published 23 November 2022). <https://www.theyworkforyou.com/debates/?id=2022-11-23d.309.0#g312.0>

<sup>7</sup> UK Parliament, Hansard (HC), ‘Manston Update’, Deb 28 November 2022, vol 723. <https://hansard.parliament.uk/commons/2022-11-28/debates/DE16D6F2-C024-411B-986F-75D99FBF309F/ManstonUpdate>

## 4. Scope and methodology

- 4.1** This reinspection examined the Home Office’s progress on recommendations made in the ICIBI’s report, ‘An inspection of the initial processing of migrants arriving via small boats at Tug Haven and Western Jet Foil (December 2021 – January 2022)’, which covered security, vulnerability, collection and use of information, and resourcing.
- 4.2** In addition to the terms of reference for this reinspection, the Home Secretary also commissioned the ICIBI to “specifically assess the situation at Manston and improvements made to address the concerns ... raised after visiting the site in October 2022”. The inspection also considered developments since the Independent Chief Inspector’s visit to Manston short-term holding facility on 24 October 2022. The inspection was concluded before the new Illegal Migration Bill was announced by the Home Secretary.<sup>8</sup>
- 4.3** Inspectors undertook the following activities:
- attended Western Jet Foil (WJF) and Manston on 12 January 2023 for a familiarisation visit
  - met with a small number of stakeholders
  - submitted to the Home Office a request for evidence on 16 January 2023
  - analysed over 100 pieces of evidence
  - attended WJF and Manston on 24 and 25 January, and 1 and 2 February 2023
  - reviewed the Operation ALTAIR Encounter Log for 25 January 2023<sup>9</sup>
  - conducted 30 interviews and focus groups with Home Office staff from Executive Officer to Senior Civil Servant Pay Band 2 (Director) and contractor staff at all grades
  - conducted informal conversations with staff from the Home Office, other agencies and contractors, and migrants at WJF and Manston
  - held a verbal feedback session on 2 February 2023 with a Grade 6 (Deputy Director) from the Small Boats Operational Command, sharing initial thoughts and indicative findings from onsite activity
- 4.4** The report was sent to the Home Office for factual accuracy checking on 17 March 2023 and returned on 31 March 2023.

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<sup>8</sup> Home Office, News story - Ground-breaking new laws to stop the boats (published 7 March 2023). <https://www.gov.uk/government/news/ground-breaking-new-laws-to-stop-the-boats>

<sup>9</sup> Op ALTAIR is the cross-government response to the threat of illegal migration in small boats which commenced on 21 December 2020.

## 5. Inspection findings: leadership

### Overall governance and management structure

- 5.1** During his visits to Western Jet Foil (WJF) and Manston in 2022, the Independent Chief Inspector commented on the lack of central leadership and governance for the processing of small boat arrivals. These concerns have been echoed by other external bodies, including His Majesty's Inspectorate of Prisons.<sup>10</sup> The previous ICIBI inspection in 2022 also identified the need for delivery of a strategic approach by the Home Office to put the response to small boats on a settled, business-as-usual basis.
- 5.2** In December 2022, the Home Office transferred responsibility for the Clandestine Channel Threat Command (CCTC) from Immigration Enforcement to Border Force. Later that month, CCTC was replaced by the Small Boats Operational Command (SBOC), led by a new Senior Civil Servant (SCS) Pay Band 2 (PB2) director. A new separate PB2 site director was also appointed to provide cross-system oversight in developing the Manston site to meet expected demand in 2023. A position statement provided to inspectors by the Home Office stated that these changes were to ensure that "there is no loss of command and management capacity following the withdrawal of Ministry of Defence assets and command structures from 31 January 2023".
- 5.3** SBOC has initially retained the five Senior Civil Servant (SCS) Pay Band 1 (PB1) (deputy director) commands that were previously within CCTC. One of these is SBOC Landside Operations, which is responsible for managing the initial arrival and triage of people at WJF, controlling beach landings, and the initial processing of people at Manston, including issuing detention paperwork and non-asylum caseworking.<sup>11</sup>
- 5.4** The new appointments have provided considerably more senior leadership capacity for the operation of WJF and Manston. However, the appointments are very recent, and have yet to be tested when the system is under considerable stress with high numbers of arrivals over consecutive days, as experienced in the autumn of 2022. Furthermore, both PB2 appointments are interim and the Manston Site Director, an experienced former prison governor, with many years' experience of detention, left at the end of March 2023 prior to the appointment of many of the key posts in that command.
- 5.5** The new leadership structure is still in its infancy and not yet embedded, with many staff new in post. As a result, and perhaps unsurprisingly, many of the staff and managers who spoke to inspectors were unclear about the respective responsibilities of the two new commands (SBOC Landside Operations and Manston Site Headquarters). One Grade 6 said: "There is a bit of a void in terms of who is setting the direction beyond PB1 level."
- 5.6** An SBOC manager told inspectors that they felt positive about the move to Border Force (BF): "There are a lot of potential gains from being in Border Force, particularly around governance

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<sup>10</sup> [Report on an unannounced inspection of the short-term holding facilities at Western Jet Foil, Lydd Airport and Manston by HM Chief Inspector of Prisons 25-28 July 2022 \(justiceinspectors.gov.uk\)](#)

<sup>11</sup> The other PB1 Commands are Future planning and capability, Technology, Illegal Migration Strategy and International Operations.



and assurance". They added that there was "the potential to make better use of surge resource" when compared to Immigration Enforcement. However, SBOC needed to develop a "cultural identity that helps overcome some of the tribal differences between Border Force and Immigration Enforcement". These differences had led, for example, to a lack of co-operation between Immigration Enforcement and Border Force when SBOC initial training was being developed, and some staff still having "a bit of a critical incident mindset and doing whatever is in front of them as a priority, rather than thinking through proper governance and assurance processes".

- 5.7** As a consequence of the creation of SBOC and its transfer to BF, at the time of the inspection the organisation was still working through the practicalities of what this meant for its operations. One senior manager stated: "The transfer of operations to Border Force from Immigration Enforcement was at short notice and not supported by a change programme, and so there are outstanding challenges, particularly in respect of skills and training." Expansion of the resourcing for SBOC is considered in chapter 9, 'Inspection findings: staffing'.
- 5.8** Most staff who inspectors spoke to considered that they were well supported by their line manager, able to raise concerns and make changes to improve processes. One BF officer described their line manager as being "visible and proactive".
- 5.9** Inspectors requested details of the overall governance mechanisms for the processing of small boat arrivals and were provided with details of Manston Delivery Board (MDB) meetings from July to November 2022.<sup>12</sup> Additionally, inspectors were provided with PowerPoint presentations for the Manston Programme Senior Steering Group for this period, the latest Manston Strategic Risk Register (December 2022), and the Manston Risks and Issues Register.<sup>13</sup> In summary, the main risks identified were: securing ownership of the Manston site (this is now in the process of being completed); securing planning permissions for developing buildings; inflow and outflow capacity (requiring better processes and dependent on elements such as technology, travel, and accommodation to prevent detention limits being exceeded); and insufficient numbers of staff and contractors with the appropriate skills, including Detention Custody Officers. How these risks are being mitigated is considered in subsequent chapters of this report.

## Co-ordination and communications between agencies

- 5.10** Inspectors dialled into a number of twice-daily routine system and update calls, generally led by the officer in charge at Manston.<sup>14</sup> These calls centred around the sharing of updates from the various agencies based at the Joint Control Room (Maritime Delivery Cell), WJF, and Manston about likely arrivals and progress with processing migrants onsite. The calls were supplemented by 'daily products' including live event 'SITREPs',<sup>15</sup> a systems dashboard, and a system projection to inform priorities for the day.
- 5.11** Inspectors observed that these calls were generally well attended by agencies and facilitated the planning of staff and other resources. The calls also supported problem solving, for example technology outages, although they were sometimes hindered "by issues with obtaining real-time data". A senior manager described these system update calls as "useful, but people don't always attend despite their importance".

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<sup>12</sup> The MDB leads the Manston programme with the following aim: "Delivering an efficient response to small boats arrivals, with effective cross system collaboration through an integrated 'one team' culture, that supports the vulnerable and tackles criminality, treating all with dignity and respect."

<sup>13</sup> The Senior Steering Group has a wider remit than the MDB as it is more concerned with the operations.

<sup>14</sup> The officer in charge would be the 'System Co-ordinator' or 'Duty Gold Commander'.

<sup>15</sup> Situation report.

- 5.12** Inspectors spoke to several staff from various agencies involved at WJF and Manston who expressed concern that relationships between agencies required improvement, with “an unwillingness of staff to talk to each other and Bronzes [managers in charge] having to frequently unblock issues between agencies”. This resulted in a silo mentality, which meant that the process did not flow as efficiently as it should at points of handover, for example, from immigration processing into the detention areas and from there to asylum screening. Notably, asylum screening is not within the remit of Border Force, and so requires co-operation across another area of the Home Office, as well as contractors.
- 5.13** Senior managers recognised this issue and a regular PB1 working group call, which was stopped owing to lack of capacity during the period of peak arrival numbers, was re-established in January 2023. This was with a view to improving co-operation and creating channels for escalation.

## Strategic vision and delivery plan

- 5.14** Inspectors asked the Home Office for the current overarching strategy for the response to small boat arrivals and any supporting delivery plan. The Home Office provided a draft version of the CCTC Operational Campaign Assessment, dated 25 October 2021, which recommended that detailed plans should be developed for the most critical actions, to include milestones, dependencies, risks/mitigations, costs, resource requirements, accountability structures, and governance. The document included the following comment: “Going forward, the plan will need to be continuously monitored and the decisive conditions evaluated to ensure progress towards achieving the objectives is being maintained – this review should ideally take place every 6 months.” Inspectors have not been provided with any further update.
- 5.15** The Home Office also provided the ‘Manston Recovery Plan’, dated 8 November 2022, which set out the background to the issues Manston faced, a plan for recovery to a lawful position in terms of detention, and five objectives and six priorities as set out in figure 5 below.

**Figure 5: Manston Recovery Plan**

Objectives	
1	Increase outflow from Manston
2	Rapid improvement of the site
3	Restore the Initial Triage and Processing Centre to its original purpose
4	Accelerate the medium-term accommodation plan
5	Optimise the system
Priorities	
1	Continued focus on outflow from Manston and restoring the ITPC to its original lawful purpose <sup>16</sup>
2	Improvement of the site
3	Medium-term accommodation plan
4	Review the target operating model for Manston
5	System optimisation with a focus on the Engagement Plan and the information management/decision support tools
6	Implementation of target operating model

**5.16** Inspectors requested an update of progress with the Manston Recovery Plan and a copy of the target operating model. In its response, the Home Office stated: “Although elements of a target operating model, such as the appointment of key personnel, are in place, the wider model is still evolving and yet to be agreed.” It has therefore not been possible to review progress against the Manston Recovery Plan as part of this inspection. However, the plans for the creation of a ‘Residential Holding Room’ (RHR) are considered in chapter 12, ‘Future plans’.

**5.17** Inspectors were advised by senior managers that “longer- term planning is also being developed to provide a 2024+ vision for the Manston facility. This will include purpose-built facilities, short-term holding and processing facilities, meeting future demands and providing longevity.” Inspectors concluded that currently there is no clear strategic vision for the processing of small boat arrivals that encompasses the future use of WJF and Manston (short-term holding facility and RHR) with clear links to subsequent stages of asylum processing.

<sup>16</sup> ITPC: Initial Triage and Processing Centre is the term the Home Office previously used to describe the functions of Manston in 2022. It is now described by the Home Office as a short-term holding facility.

## 6. Inspection findings: security

### Arrival at Western Jet Foil

- 6.1** In a change of process from that observed in the 2022 inspection, the processing of migrant arrivals now takes place at two separate sites, Western Jet Foil (WJF) and Manston. All 'operating mandate' checks such as biometric registration and the checking of biodata against Home Office and criminal databases takes place at Manston. The Home Office states that this two-site process means that "full border security checks are carried out before anyone leaves the Manston site".
- 6.2** Inspectors observed that, when a small boat was intercepted at sea by a Border Force or Royal National Lifeboat Institution (RNLI) vessel, migrants were given a 'quick response' (QR) coded vinyl wrist band on which an 'event number' and a pre-populated 'migrant number' were written.<sup>17</sup> The number was added to the Encounter Log and followed the migrant through the processes at WJF and Manston.
- 6.3** Migrants are no longer required to 'cross deck' over two tugboats and enter Tug Haven via a linkspan bridge in view of the public. As of August 2022, and as shown in image 1, migrants disembark from the vessel up a pontoon directly into the WJF site.

**Image 1: Pontoon to Western Jet Foil site**



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<sup>17</sup> A quick response code (QR) is a type of matrix barcode, or two-dimensional barcode, invented in 1994 by Japanese company Denso Wave.

- 6.4** Staff from Interforce, a security contractor, escort migrants to the ‘red marquee’, where the focus is on vulnerability, health, and welfare processes, as part of Border Force’s ‘Safety of Life at Sea’ (SOLAS) operation. On arrival, migrants have their wristband scanned and are seated while waiting for further processing, including the provision of medical assistance if required.
- 6.5** On completion of the initial SOLAS processes, migrants were escorted to the main WJF modular building for further processing. Here they were administratively arrested under Schedule 2, Part 1, S17(1), 1971 Immigration Act, and basic information including name, age, gender, and any vulnerabilities or medical conditions/concerns were recorded in the ‘SBOC scribe sheet’ (an Excel spreadsheet held on SharePoint).<sup>18,19,20</sup> Inspectors observed an improvement relative to the 2022 inspection, in that there were television screens displaying a message that read: “You may be liable to administrative arrest. This is not a criminal arrest. The arrest is for immigration purposes only; to allow further [sic] of your immigration status and why you have come to the UK.” The message was provided in English and in ten other languages on a continuous loop.<sup>21</sup>
- 6.6** No interpreters were present at WJF, and the arrest was primarily conducted in English. Officers told inspectors that they had access to ‘thebigword’ telephone interpretation services and the use of laminated sheets that could be used to ask a migrant their age, and nationality and to explain why they were being arrested, which were described by officers as “extremely helpful”. In the absence of in-person interpretation services, inspectors observed Border Force officers using security staff to act as interpreters when attempting to communicate with migrants. This could be inappropriate if a migrant is sharing personal information.
- 6.7** The use of Excel spreadsheets on SharePoint relies on officers cutting and pasting data between different spreadsheets, which increased the risk of data errors. This is not a robust system to deal with the volumes of migrants SBOC is processing. Data issues and IT infrastructure are considered in more detail in chapter 8, ‘Inspection findings: data’.

## Searches

- 6.8** In accordance with paragraph 25B (2), Schedule 2, Immigration Act 1971, all migrants under administrative arrest have their property and clothing searched by a Border Force officer in the presence of the migrant. Relevant items, such as large amounts of money, can be seized and referrals for onwards investigation made if appropriate. Items seized while inspectors were at WJF included identity cards, immigration paperwork, driving licences, and cash.

## Previous recommendations

- 6.9** In the 2022 inspection the Independent Chief Inspector of Border and Immigration (ICIBI) made four recommendations relating to security, which covered training and guidance in the operation of Biometric Recording Stations (BRSs), and processes for handling migrants’ belongings and intelligence material.<sup>22</sup>
- 6.10** In its response to the 2022 inspection, the Home Office accepted the ICIBI’s recommendations on security, and in July 2022 stated: “The department has completed all the actions required

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18 Immigration Act, 1971, Schedule 2, Part 1. <https://www.legislation.gov.uk/ukpga/1971/77/schedule/2/part/1/crossheading/detention-of-persons-liable-to-examination-or-removal>

19 The full list of fields in the SBOC scribe sheet is: boat ref, date and time of arrival, band colour, migrant number, wristband number, gender, age, nationality, family group number, family group relationship, if they are an unaccompanied asylum-seeking child, if they are a single adult male (SAM), a single adult female (SAF), surname, forename, date of birth, vulnerability, and medical conditions/concerns.

20 SharePoint enables documents to be accessed, and entries made, by required teams across the Home Office

21 The electronic arrest message is displayed in Tigrinya, Albanian, Farsi, Dari, Arabic, Vietnamese, Persian, Pashto, Urdu, and Kurdish Sorani.

22 ICIBI, ‘An inspection of the initial processing of migrants arriving by small boats’.

to address this recommendation. We recognise that assurance of processes and individual knowledge lies at its heart.”<sup>23</sup> The Home Office further supplied a Service Improvement Plan (SIP), dated January 2023, outlining subsequent progress against the recommendations.

<b>Recommendation 1a – training and operation of Biometric Recording Stations</b>	
<b>Recommendation from the 2022 inspection</b>	
1a	“Within one month ensure that the staff are sufficiently trained and provided with updated guidance on ... the operation of the mobile Biometric Recording Stations (BRS).”
<b>Home Office response to the 2022 inspection</b>	
	<p>“By the time the report was received in the Home Office, we had already revised our standard operating procedures (SOPs) for Op ALTAIR to ensure that the operation of BRS at Manston was fully covered in training materials and its usage and data quality was assured.”</p> <p>“The process of familiarising all staff with these changes and ensuring that all were suitably trained in the use of BRS equipment and the data quality standards that go with it was completed by the end of March 2022.”</p> <p>“A BRS user guide has been incorporated into the SOP. Unaccompanied asylum-seeking children (UASCs) and other vulnerable cohorts who are not suitable for Manston continue to have their biometrics taken at WJF.”</p>
<b>Home Office Service Improvement Plan 2023</b>	
	<p>Additional developments:</p> <p>“There is a process in place to ensure new members of staff are provided the required training to effectively undertake the role of biometric capture at either site.”</p>

- 6.11** During the 2022 inspection, there were four mobile BRSs in use at WJF. At that time officers told inspectors this equipment was “slow and temperamental”, and at one point during inspectors’ observations only one of the four BRSs was working. Other issues included missing cables, unhelpful guidance, and problems connecting to the Home Office Wi-Fi network.<sup>24</sup>
- 6.12** As part of the current inspection, inspectors reviewed the BRS user guide, last updated on 28 October 2020, and a simplified BRS ‘step-by-step’ user guide, created on 19 February 2022. Inspectors observed the use of BRS, which involved scanning all the migrant’s fingerprints and the taking of a digital photograph, which was then linked to the migrant’s name, date of birth and nationality. BRS itself appeared to be simple to use and operate, and the system provided on-screen prompts and instructions on how to address any errors that occurred. Staff told inspectors that they had received training and guidance on the use of BRS and confirmed the system was straightforward to use.
- 6.13** As of February 2023, a mobile BRS is still available for use at WJF, but this BRS was described as a “fail safe if there is an issue at Manston” and not routinely used. There were eight fixed and one mobile BRSs at Manston (see images 2 and 3). Fixed BRSs do not require setting up at the beginning of each shift and having a fixed desktop BRS reduces the risk of user error in setting up the equipment and the loss of cables.

<sup>23</sup> Home Office, ‘A response to the ICIBI’s report on the initial processing of migrants arriving via small boats at Tug Haven and Western Jetfoil (December 2021 to January 2022)’ (published 21 July 2022). <https://www.gov.uk/government/publications/response-to-icibi-report-on-small-boat-arrivals-at-tug-haven-and-western-jetfoil>

<sup>24</sup> ICIBI, ‘An inspection of the initial processing of migrants arriving by small boats’.



## Image 2: Mobile BRS at WJF, Jan 2022 Image 3: Fixed BRS at Manston, Feb 2023

[Redacted]

[Redacted]

- 6.14** Despite these improvements, there were still incidences of BRSs not working. Inspectors observed two of eight BRSs not operational, slowing the processing of migrants in the Manston fire station. Staff and managers were aware of the issues caused by BRS, describing it as being “end-of-life kit” that was “not built for mass use, with frequent breakdowns”.
- 6.15** While an operational manager reassured inspectors that complete outages of BRS itself were rare, they suggested that failures of single fingerprints to enrol was common. The ease of use and reliability issues were summed up by one officer who stated: “It’s great when they work. It’s user friendly. One is faulty today; it can be temperamental.”
- 6.16** Senior managers are aware of the shortcomings of BRS, with one telling inspectors that having a system like BRS in an area that is a “top national priority” was “surprising and not appropriate”. There have been efforts at procuring a new bespoke system, but as of February 2023, these have been unsuccessful.
- 6.17** In a review commissioned by the Home Secretary, it was stated that, to meet the aspirational level of processing 1,600 migrants per day, BRS would need to be updated, and the number of BRS processing lanes at Manston increased fourfold. Senior managers told inspectors that the Home Office had recently purchased an additional five BRSs.

## Recommendation 1b – Suspension of biometric checks

### Recommendation from the 2022 inspection

1b “Within one month ensure that the staff are sufficiently trained and provided with updated guidance on ... the circumstances and authority level required for a migrant to be transferred from WJF without a biometric check being completed and recorded.”

### Home Office response to the 2022 inspection

“The BRS biometric check for the majority of arrivals now takes place at Manston. As part of our response to recommendation 1a above, we reviewed the authority level for the exceptional suspension of BRS enrolment at Manston. The authority level for suspension is the Op ALTAIR Gold Commander. Potential mitigation in the event of suspension of BRS enrolment includes a GRABBA check and the flagging of affected cases to Asylum & Protection so that biometrics can be captured as soon as possible from the individuals further into the induction process.<sup>25</sup> Since operations at Manston went live earlier this year, this contingency has not been required.”

“As part of the mitigation against procedural delay or technical difficulties preventing swift capture of biometrics, we have an agreement with Detention and Escorting Services that any person for whom all of the Operating Mandate (OM) checks (including biometric registration) have not been completed by the time that the limit on holding at Manston is reached may be detained at an Immigration Reception [sic] Centre (IRC) until such time as those mandate checks are completed by asylum and protection staff. This will be dependent on availability at an IRC.”

### Home Office Service Improvement Plan 2023

Additional developments:

- “The BRS biometric check for the majority of arrivals now takes place at Manston. The exceptions be [sic] anyone not suitable to be routed to Manston & that [sic] are not going to be moved to Kent Intake Unit.”
- “The authority level for suspension of BRS enrolment at Manston is now SCS Pay band 1.”

- 6.18** During the 2022 inspection, inspectors found that biometric enrolment at WJF had been suspended on a number of occasions. To mitigate this risk, the Home Office said that migrants could be processed at an Immigration Removal Centre (IRC) or at ‘secure hotels’. Poor security at these hotels undermined this mitigation, resulting in migrants absconding prior to having their biometrics enrolled. In the 2022 inspection, between 1 December 2021 and 10 January 2022, 57 migrants had absconded from secure hotels, 38 of whom had not had their biometrics enrolled.
- 6.19** For this inspection, Home Office data examined showed that, over the period 1 July 2022 to 31 December 2022, no migrants had left Manston without having had their biometrics enrolled. Inspectors listened to the twice-daily ‘system update’ call where, among other items, the length of time migrants had been at Manston was discussed. On one such call, the reasons for a migrant being held for over 24 hours on an exceptional basis was due to uncompleted fingerprint checks.
- 6.20** Migrants are subject to ‘Operating Mandate’ (OM) checks. These include checks against the Police National Computer (PNC), IDENT1, [Redacted], Immigration and Asylum Biometric

<sup>25</sup> GRABBA is a hand-held peripheral docked to a Home Office mobile phone used to search fingerprint databases.



Information System (IABS), and internal Home Office systems.<sup>26,27,28,29</sup> The 2022 inspection noted that, of the 57 migrants who had absconded from a secure hotel, 41 had not had their OM checks completed. According to a process map provided by the Home Office to inspectors for the current inspection, those migrants who had outstanding OM checks would be transported to an IRC to await the completion of these checks or to be bailed. A senior manager told inspectors that “people never leave without mandatory checks”.

<b>Recommendation 1c – Property</b>	
<b>Recommendation from the 2022 inspection</b>	
1c	“Within one month ensure that the staff are sufficiently trained and provided with updated guidance on ... the process for the seizure, retention or return of property including cash and identity documents.”
<b>Home Office response to the 2022 inspection</b>	
“A revised process for the seizure, retention or return of property was drawn up and was put in place by the end of March 2022, with all staff (including contractors) suitably inducted into its use and assurance mechanisms in place to monitor and promote adherence.”	
<b>Home Office Service Improvement Plan 2023</b>	
Additional developments:	
<ul style="list-style-type: none"> <li>• “All operational staff were instructed to return any cash identified to those arriving.”</li> <li>• “These processes will be continually reviewed &amp; updated as both the operational process &amp; partners (Home Office &amp; External) change.”</li> <li>• “As part of that review process, we identified further issues with property handling and have now decided that we will adopt the Short-Term Holding rules in relation to property [sic] will be established by the end of February 2023.”</li> </ul>	

**6.21** Inspectors observed and were told by staff that issues regarding the handling and processing of migrants’ property still existed. On arrival at the red marquee migrants are ‘wanded down’ by security contractors.<sup>30</sup> Migrants are not subjected to a ‘pat down’ search at this stage. They are then given a clean, dry set of clothes to change into.

**6.22** Large blue plastic bags are used to contain migrant’s belongings. Items found in a migrant’s pocket or personal bag are placed in a separate bag (bag one); clothing and shoes, including wet items, are placed in a different bag (bag two). Bag one is then placed in bag two to keep a migrant’s property together. The items in these bags are not inventoried. Once a migrant has been administratively arrested at WJF a Border Force officer searches the migrant’s property in their presence. Any items of interest, including identity documents, may be taken from the migrant and placed in an evidence bag at this stage. Migrants’ mobile phones are not confiscated but remain in the property bag until they leave Manston to go to their onwards destination.

26 PNC: Police National Computer, a computer system for England and Wales that holds information about criminal records.

27 IDENT1: UK police database that provides fingerprints services to the Home Office to forensically verify or resolve identities in the UK, including those who have been taken into custody, or fingerprints taken at the scene of the crime.

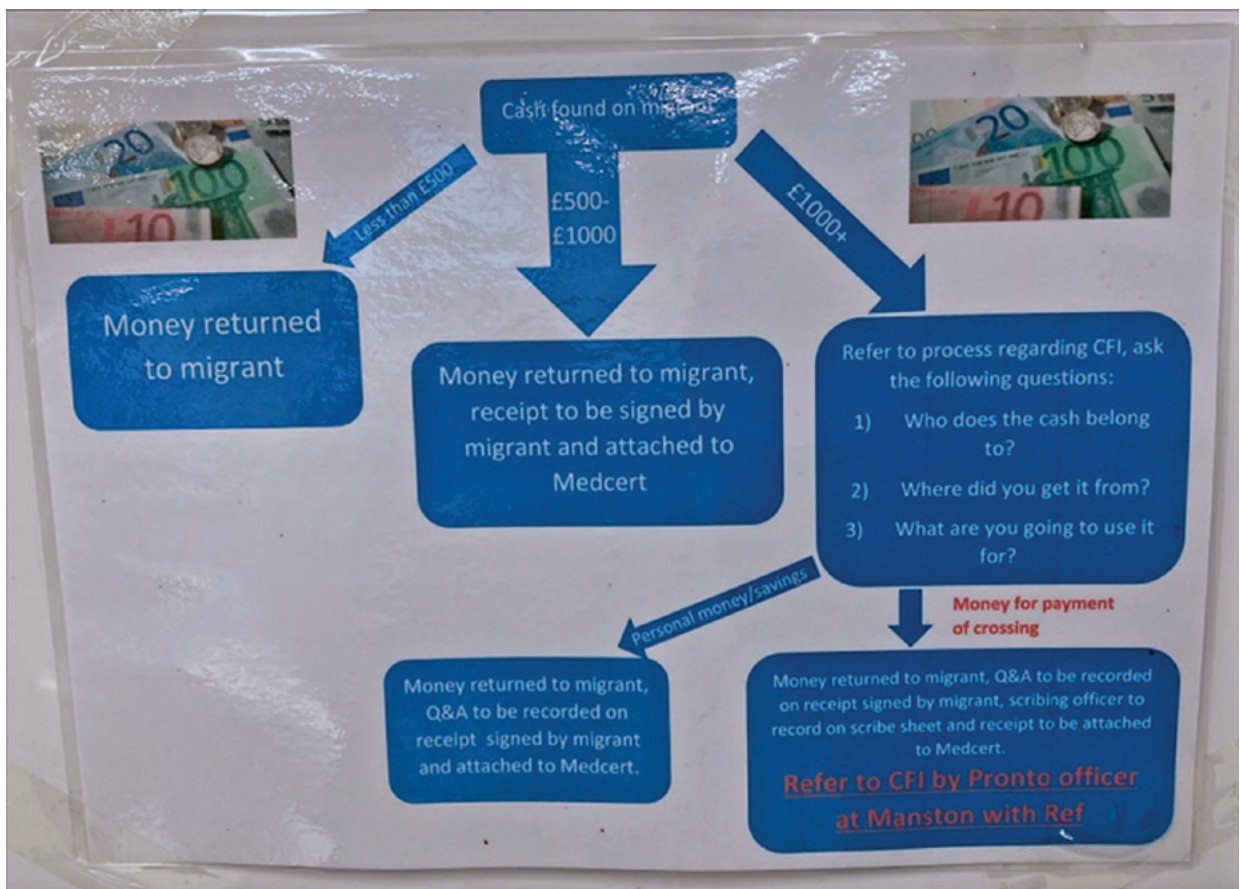
[Redacted].

29 IABS: the Immigration and Asylum Biometric Information System, which provides biometric identity services (fingerprint and facial image) for the Home Office.

30 Security contractors used Garrett handheld metal detectors to determine if a migrant had any metal items on their person. This check was colloquially known as being ‘wanded down’.

**6.23** It is during the migrant’s property search that officers who were trained in ‘behavioural detection’ look for items of ‘pocket litter’ such as travel tickets, receipts, and telephone numbers. As shown in image 4, any cash found on a migrant should be returned to them. If a migrant has £500 to £1,000 on them, a receipt is signed by the migrant and attached to their paperwork. If a migrant has over £1,000, they are asked who the cash belongs to, where the cash came from, and what the cash will be used for. If the money is to be used to pay for the crossing, this is referred to the Criminal and Financial Investigations (CFI) team who has the opportunity to interview the migrant if it is deemed necessary.<sup>31</sup>

**Image 4: Poster at the WJF arrest desk area detailing the process to be used when encountering migrants carrying cash**



**6.24** Despite this poster and the Service Improvement Plan (SIP) update stating that “all operational staff were instructed to return any cash identified to those arriving”, inspectors noted two incidences on 25 January 2023 where cash had been recorded as being “detained” from migrants.<sup>32</sup> This suggests a need for staff to be reminded of the processes when handling cash found on migrants.

**6.25** Inspectors observed large numbers of property bags, which had been separated from migrants, stored undercover and on racking in a contractor-run marquee. Some of these property bags dated back to the time of the Independent Chief Inspector’s October visit and included mobile phones. Some of these bags were damp and mouldy because of wet clothing and property being stored in plastic bags for a protracted period of time.

<sup>31</sup> The Criminal and Financial Investigation Team is a Home Office team with responsibility for disrupting and dismantling organised criminal groups involved in organised immigration crime.

<sup>32</sup> The Encounter Log record included reference to a “large amount of cash (detained not seized)” in the ‘seized’ column.

- 6.26** Officers told inspectors of the difficulties they faced during times of high population at Manston with one stating: “You have a coach load of people waiting to leave and trying to find their property to give it back to them was a challenge. Trying to find 30 bags, while there were 3,000 of them here, was a nightmare.”
- 6.27** Senior managers told inspectors of “aspirational plans” to create a store to house migrants’ property and use of a radio-frequency identification (RFID) system linking a migrant’s wristband and their property.<sup>33</sup> A senior manager told inspectors that the Home Office would be adopting the Short-term Holding Facility Rules 2018 as they apply to belongings. Under these rules the Home Office is able to dispose of a migrant’s unclaimed property after 28 days, or after 12 months for valuables.<sup>34</sup>
- 6.28** Officers told inspectors that on ‘green days’ they would spend time taking migrants’ property to hotels in an effort to reunite them. Although these efforts should be commended, the impact on a migrant of losing their possessions, in particular a mobile phone, which could be the only way of contacting family and support networks, should not be underestimated.

<b>Recommendation 1d – Intelligence material</b>	
<b>Recommendation from the 2022 inspection</b>	
1d	“Within one month ensure that the staff are sufficiently trained and provided with updated guidance on: the process for the seizure, retention or return of intelligence material.”
<b>Home Office response to the 2022 inspection</b>	
“The department does not ‘seize’ material for intelligence purposes. We observe and record information for potential future processing as intelligence material. We drew together, at pace, improvements for intelligence capture and dissemination, with a programme of work to upskill intelligence gathering among staff at WJF and Manston, so that intelligence opportunities could be maximised.”	
“This included all Clandestine Operations Response Team (CORT) staff undertaking mandatory intelligence awareness training. This was completed by the end of April 2022 and processes were further refined in July 2022 as part of our work to continually improve processes and procedures.”	
“Those IE Rapid Response Team (RRT) members who are consistently deployed to support the processing of arrivals have also been trained. The IE Head of Intelligence for small boats provided written guidance for all staff deployed to work within the small boat threat. This guidance is available electronically to staff and features in joining instructions for officers attending Western Jet Foil/Manston. We also trained, and provided guidance to, the contractors who support our operations following completion of CORT and RRT staff.”	
“The upskilling and skills refresh activities for most of recommendation 1 was [sic] completed by the end of March 2022, together with the implementation of robust assurance processes to ensure that standards are maintained. The upskilling and skills refresh activities for recommendation 1d were completed by the end of April 2022 and have since been reviewed and improved further.”	

33 Radio-frequency identification (RFID) uses electromagnetic fields to automatically identify, and track tags attached to objects. An RFID system consists of a radio transponder, a radio receiver, and a transmitter. When triggered by an electromagnetic pulse from a nearby RFID reader device, the tag transmits digital data, usually an identifying inventory number, back to the reader. This number can be used to track inventory goods.

34 The Short-Term Holding Facility Rule 2018, No 409, Part 3, Admission and discharge. <https://www.legislation.gov.uk/uksi/2018/409/part/3/chapter/1/made>

## Home Office Service Improvement Plan 2023

Additional developments:

- “RRT carried out specific information/intelligence gathering work under Op CASSIOPE and now we have recruited a dedicated team in International Operations to carry out this work for both people and vessels.”
- “As new CORT staff are recruited, they will receive intelligence awareness training and be provided with regular intelligence briefings to support them in their roles.”

- 6.29** A senior manager whose responsibilities included information, intelligence, and evidence gathering told inspectors that their team was focused on looking at migrants’ belongings for “‘pocket litter’, collecting papers, tickets and telephone numbers”. This team of six was trained in ‘behavioural detection’ and was “multidisciplined” so it could work at any location but worked mainly from WJF.<sup>35,36,37</sup>
- 6.30** The senior manager told inspectors that they had introduced ‘town hall meetings’ with SBOC staff and contractors to inform staff about intelligence gathering, any emerging trend or patterns, what sort of pocket litter to look for, and whom to inform if they found or observed anything that may be of interest. This team worked with Home Office Intelligence, Counter terrorism (CT) police, and the National Crime Agency.<sup>38</sup> Intelligence gathered on small boat operations was stored and shared with any relevant agencies through the Home Office Intelligence Management System.
- 6.31** Officers told inspectors that they would look for certain behaviours of migrant arrivals to try and identify those who were a “leader” or a “driver” of a boat and that they were “constantly looking for things”. Most officers inspectors spoke to were confident of when and how to make a security referral to CT police. [Redacted].
- 6.32** [Redacted].

35 This team consisted of one Immigration Officer, two Chief Immigration Officers, two His Majesty’s inspectors and an Assistant Director (six in total).

36 Pocket litter is material, including notes on scraps of paper, that accumulates in an individual’s pockets. It can include identity cards, transportation tickets, personal photographs, computer files, and similar material.

37 The term ‘behavioural detection’ refers to a method of detecting individuals with hostile intentions by observing their behaviours and activities.

National Protective Security Authority, ‘Behavioural Detection’ (updated 27 February 2023). <https://www.cpni.gov.uk/behavioural-detection-0>

38 The National Crime Agency, also known as the NCA, is a crime-fighting law enforcement agency responsible for leading the UK’s fight to cut serious and organised crime. <https://www.nationalcrimeagency.gov.uk/>

[Redacted]

[Redacted]

- 6.33** Inspectors interviewed and observed CT policing officers from Kent Police at WJF. These officers had access to all the areas that they required, could speak to migrants as they wished, and were observed engaging with migrants and Border Force officers, as well as contractors. The police officers told inspectors that there was close working between contractors, Border Force, and CT policing, describing the operation as “multi-agency”.
- 6.34** The Home Office stated: “We have also worked to encourage the reporting of intelligence from staff on site ... and that process appears to now be gaining a bit of traction and will no doubt be fully manifested when the new Control Room facility is active at Manston.” A senior manager told inspectors that communication and engagement needed to improve, and stated that they would like to enhance information sharing through the introduction of verbal briefings at the start of officers’ shifts rather than requiring officers to read briefing packs.

# 7. Inspection findings: vulnerability

## Previous recommendations

**7.1** The 2022 inspection identified deficiencies in the identification of vulnerable migrants, the recording of vulnerabilities, and the collection and use of vulnerability data. The report therefore made three recommendations regarding vulnerability, around guidance, training, and monitoring mechanisms for staff to improve operational performance. The Home Office responded to these recommendations in July 2022<sup>39</sup> and later supplied a Service Improvement Plan (SIP), dated January 2023, outlining subsequent progress against the recommendations.

<b>Recommendation 2a – Identifying vulnerable migrants</b>	
<b>Recommendation from the 2022 inspection</b>	
2a	“Provide guidance, training and monitoring mechanisms for staff to improve operational performance in respect of:  identifying all vulnerable migrants at the earliest opportunity and engaging, proactively and constructively, with those with inherent vulnerabilities, such as unaccompanied children, single women and families.”
<b>Home Office response to the 2022 inspection</b>	
“We accept this recommendation and were already working on improving our identification of vulnerability in our addressing of Recommendation 5.2 in last year’s HMIP report. The fundamental changes to our processes and the prioritisation of SOLAS management at WJF ahead of formal processing at Manston means that our staff now have more capacity and opportunity to identify vulnerability. Vulnerability is now captured and recorded at the earliest opportunity and tracked and reviewed throughout the non-detained process and thereafter. In most cases it is recorded at the WJF – with Beach Landings being triaged and recorded upon arrival at Manston. We continue to prioritise the welfare of UASCs, families and vulnerable adults at the initial point of arrival.”	
<b>Home Office Service Improvement Plan 2023</b>	
Additional developments:	
	<ul style="list-style-type: none"><li>• “UASCs, and those not suitable for detention in alternative locations, now have their asylum claims registered through the Kent Intake Unit. We have worked closely with KIU [Kent Intake Unit] to map the process journey for differing categories of vulnerability.”</li></ul>

<sup>39</sup> Home Office, ‘Response to ICIBI report on small boat arrivals at Tug Haven and Western Jetfoil’.

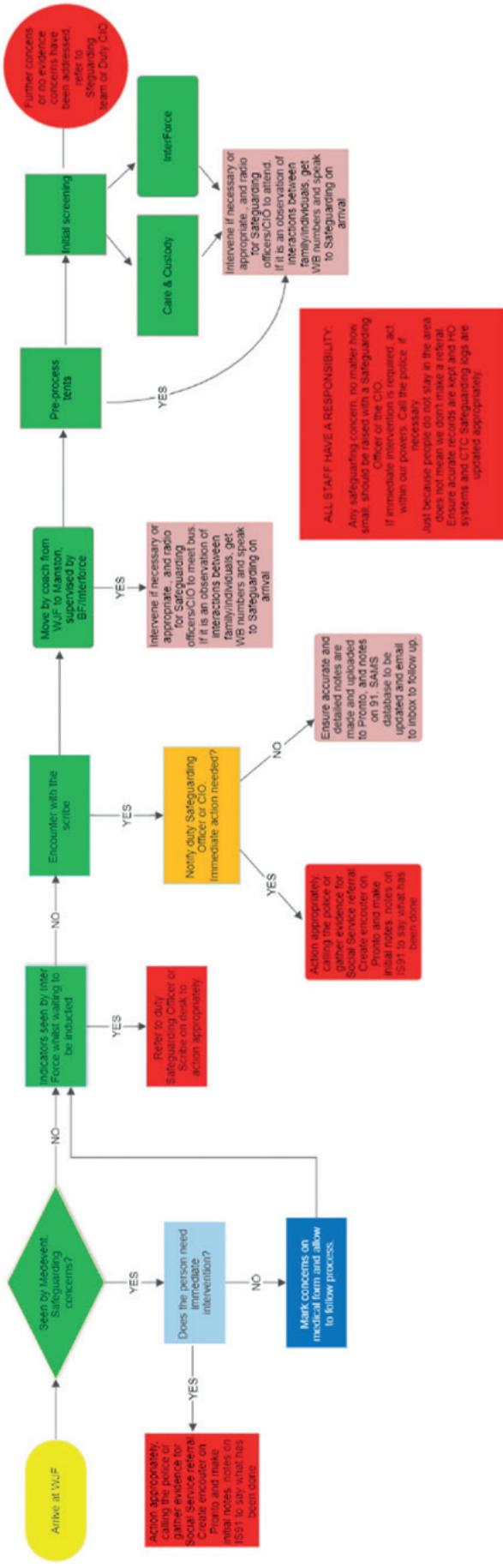


- “... working with partners, including British Red Cross, to improve the identification of vulnerability at [sic] soon as possible during the reception and induction process, as well as during rescue. Potentially vulnerable migrants are now visibly, but discreetly, flagged to ensure appropriate support is provided. An initial assessment is carried out immediately on arrival and specific vulnerabilities are identified and tracked as the person moves through all the processes.”
- “All staff and contractors who engage with migrants have been made aware of the system. Our ambition is to use technology to identify and track vulnerable migrants through the process.”
- “A remedial plan has been created to address identified training gaps. We are also working with our contractors to ensure that any vulnerability identified during medical examination etc is also captured.”
- “... currently developing an electronic patient data tracking solution that will enable vulnerability and safeguarding to be tracked throughout an arrivals initial encounter.”
- “Pregnant arrivals seen by EKHUT are issued an NHS number.”<sup>40</sup>
- “A Vulnerability and Safeguarding Lead has been appointed within the SBOC and a Healthcare & Safeguarding Team is currently being mobilised at Manston ... we have given stakeholders a single point of contact to raise concerns.”
- “... a flow chart shared with staff and stakeholders, so they are aware of their responsibilities at the various points.”
- “If immediate intervention is required at WJF, we have use of the Independent Social Workers who can assist with safeguarding interviews and family relationship interviews and UASCs. If necessary, staff know to call the police to intervene. We are building a team of officers trained to undertake these interviews in the absences of social workers, but getting the training is proving difficult.”
- “Some staff and stakeholders, including Care & Custody, InterForce and Medevent, have had basic safeguarding awareness training, and there are plans to roll this training out to all staff over the coming months.”

## The initial identification of vulnerable migrants

- 7.2** In the position statement provided for this inspection, the Home Office described how, since the 2022 inspection, the focus at WJF has been “to prioritise safety of life at sea and vulnerability considerations when migrants arrive. This also allows us to concentrate immigration induction functions at Manston, improving efficiency of processing.” This means it is particularly important that vulnerabilities are picked up at the first opportunity at WJF.
- 7.3** As part of the evidence return for this inspection, the Home Office provided the new safeguarding process flow chart. This is reproduced as supplied at at figure 7.

Figure 7: Safeguarding process flow chart





- 7.4** SBOC staff told inspectors: “We’ve had lots of Teams briefings and e-Learning training on safeguarding vulnerable adults and learnt what to flag. We are looking into doing more and having a safeguarding team, but at the moment we really don’t have the time when busy to look out for vulnerabilities.”
- 7.5** Inspectors found that, although new systems were being designed and put in place, there were still significant shortcomings in the identification and handling of vulnerable migrants.

## Vulnerability and safeguarding training

- 7.6** Inspectors requested data from the Home Office showing the number of Home Office and contractor staff who had received vulnerability and safeguarding training. Nineteen SBOC staff had received vulnerability training, amounting to 17% of staff at Border Force officer (BFO) to Border Force senior officer (BFSO) grades. For safeguarding, SBOC was unable to provide training figures, as the training was not routinely delivered by Immigration Enforcement and plans to reinvigorate training under Border Force were not yet complete. At the time of this inspection in February 2023, inspectors were told: “Border Force training isn’t suitable for us ... there is also the constraint of not enough trainers.”
- 7.7** The Home Office informed inspectors that, as an interim measure, “SBOC Welfare team are creating bite size sessions of about 10-15 minutes that can be rolled out by any of the team members on days where there are no migrants, to keep staff focused on when to intervene and when to refer.”
- 7.8** A BFO told inspectors: “Vulnerabilities get missed because someone hasn’t been trained; one guy had been here four months with no vulnerability training. We don’t get replies from referrals we make either.”
- 7.9** A BFO working at WJF who had not received vulnerability training said that they “relied on their previous experience”. This BFO said they had created a leaflet listing relevant contacts for charities in several languages to give to potentially vulnerable migrants. While this shows laudable initiative, it serves to illustrate the reliance on individuals’ motivation and experience, rather than a rigorous, standardised, and assured process.
- 7.10** The Home Office was only able to provide training data for one contractor, which showed that, as of January 2023, out of 265 active staff at that time, 241 had received training on ‘Safeguarding and Protection of Adults’, and 237 had attended a similar course for children and young adults. These were not Home Office assured courses. As a result, the Home Office does not have a clear picture of the training needs of all contractors and staff in respect of vulnerability and safeguarding.
- 7.11** As part of the evidence return for this inspection, inspectors asked for the numbers of Home Office staff and contractor staff who had current Disclosure and Barring Service (DBS) certificates.<sup>41</sup> For the SBOC Operational Team, the Home Office stated that “zero” staff held a current DBS certificate. Out of 1,387 active contractor staff listed, 664 had DBS certificates at the time of this inspection. The DBS is a basic criminal check which employers should use for relevant roles that involve working with children or vulnerable adults. As it is a way of providing assurance about the suitability of staff it is an important safeguard that should be considered where people are being detained.

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<sup>41</sup> A basic DBS check is a criminal record check. It will contain details of convictions and conditional cautions considered to be ‘unspent’ under the terms of the Rehabilitation of Offenders Act 1974.

## Recommendation 2b – Recording vulnerabilities

### Recommendation from the 2022 inspection

- 2b “Provide guidance, training and monitoring mechanisms for staff to improve operational performance in respect of:
- accurately recording vulnerabilities on the Op ALTAIR Encounter Log, Pronto and CID<sup>42</sup>”

### Home Office response to the 2022 inspection

“Clandestine Channel Threat Command (CCTC) has worked closely with the Border Force Safeguarding and Modern Slavery (SAMS) National team and Home Office IT colleagues to build a mechanism which will enable work areas to flag and trace vulnerability cases on Home Office systems. This allows the journey of vulnerable people through the system to be monitored, reducing the risk of vulnerability needs being overlooked during casework and improving the support package for vulnerable cohorts.”

“The planning work was completed by the end of May 2022. We produced guidance covering the correct and timely recording of vulnerability on HO systems, including the Op ALTAIR Encounter Log, PRONTO and CID/ATLAS.”

“We took this work forward as part of wider departmental work around improving data quality. We created vulnerability process maps which were shared with staff and identified 10 vulnerability categories with the aid of partners, including British Red Cross. This ensures consistency when identifying vulnerability. We backed up this guidance with a programme of training which continues.”

### Home Office Service Improvement Plan 2023

Additional developments:

- “planning work to build a mechanism which will enable work areas to flag and trace to be completed and implementation of the project to be underway by the end of May 2022 [sic].”
- “producing guidance covering the correct and timely recording of vulnerability on HO systems, including the Op ALTAIR Encounter Log, PRONTO and CID/ATLAS. We are taking this work forward as part of wider departmental work around improving data quality.”
- “SBOC have established its [sic] own Safeguarding team and established robust links with Children & Adult safeguarding leads with Kent County Council. They have recently attended Manston to deliver training to staff.”
- “Through the collation of information and referral forms sent to the Safeguarding team inbox, we are able to ensure any safeguarding concerns are logged on CID and Atlas, and where appropriate the Op Altair [sic] is updated, by the safeguarding team.”

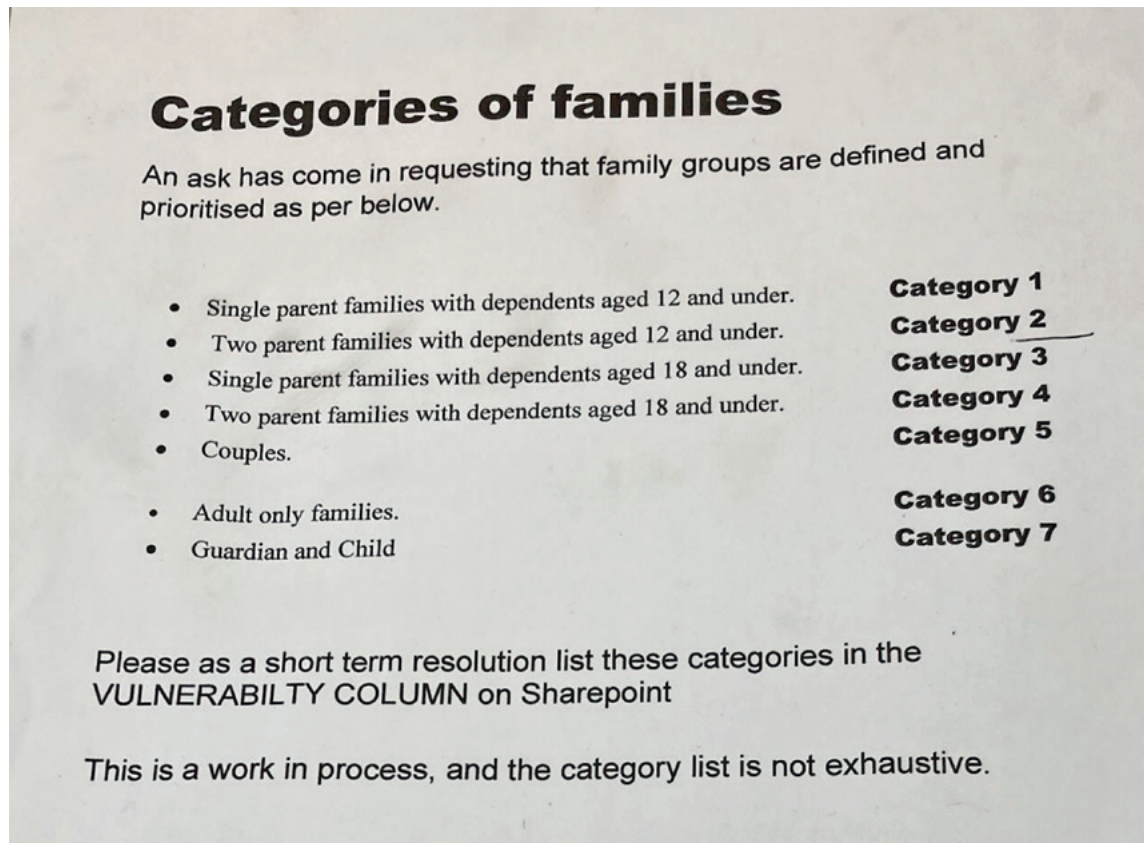
**7.12** The Encounter Log Excel spreadsheet has a field for capturing vulnerability, in free text format only. Inspectors reviewed the Encounter Log for 25 January 2023 and noted that this was not used to record vulnerabilities. Some individuals were given a category based on the make-up of their family group. Inspectors were shown a typed sheet of paper (image 5) showing an instruction for staff to record family groups according to seven categories in the Vulnerability field in the Encounter Log. Given the Home Office has identified ten vulnerability categories, it would appear a missed opportunity not to be using these as drop-down menu options for the

42 CID: case information database. This is a cross-Home Office immigration casework and reference tool (being phased out through delivery and implementation of Atlas).

vulnerability field in the Encounter Log or anywhere else. This would enable analysis of trends and improve the tracking of individuals through later stages of the process.

- 7.13** Inspectors did not find any evidence of the ten vulnerability categories identified with the aid of the British Red Cross and other partners being used across the organisation.

### Image 5: Categories of families



- 7.14** A BFO told inspectors that families move through the system rapidly, and that this meant information did not reliably travel with them. This is an issue that inspectors found when requesting evidence from the Home Office. Inspectors requested a breakdown of the demographics of migrants in the six months to the end of December 2022, including the numbers identified as vulnerable or requiring safeguarding, and the type. The submission received from the Home Office included no vulnerability data, but did not give an explanation why.
- 7.15** Inspectors requested statistics on migrants at WJF and Manston who had been identified as adults at risk in detention at each of the three levels in the six months to the end of December 2022.<sup>43</sup> In response, inspectors were only provided with the number of individuals the contractor Medevent considered to be vulnerable when undertaking initial medical checks, with no further breakdown. It would appear that no individuals have been recorded as adults at risk in this period, despite migrants arriving with disabilities or claiming they had been victims of modern slavery, contrary to Home Office policy.
- 7.16** SBOC processes provide for particularly vulnerable migrants to be transferred directly to Kent Intake Unit (KIU) in Dover rather than to Manston. However, when inspectors requested

43 UK Visas and Immigration, and Immigration Enforcement, 'Adults at risk in immigration detention' (published 26 May 2011, last updated 16 March 2022). <https://www.gov.uk/government/publications/adults-at-risk-in-immigration-detention>

information on the numbers of migrants directed there or elsewhere because of vulnerability, the data provided was incomplete, with the following explanatory narrative:

“Using a secondary method of tracking, we do hold some of the detail of those transferred to KIU which partly addresses the specific asks of ‘reason not sent to Manston’ and any ‘vulnerabilities identified’. However, this only covers 753 of those transferred.... The limitation to the data is due to the way in which the information has been stored, incomplete record keeping related to the circumstances in which a transfer took place, the use of different IT systems to record the data, and some particular issues encountered with SharePoint documents.”

**7.17** This raises further concerns about the consistency and accuracy of information gathered on vulnerability upon arrival, and about the Home Office’s ability to move information through the system to ensure any safeguarding concerns are addressed.

**7.18** Inspectors found that the Home Office’s ambition to track and review vulnerabilities through the process has not been realised due to problems with data capture, upload, and maintenance.

<b>Recommendation 2c – Collecting and using vulnerability data</b>	
<b>Recommendation from the 2022 inspection</b>	
2c	<p>“Provide guidance, training and monitoring mechanisms for staff to improve operational performance in respect of:</p> <ul style="list-style-type: none"> <li>collecting and utilising vulnerability data to inform staff (regularly and through clear communications) of the vulnerability characteristics of those who have arrived via small boats to inform intelligence and safeguarding priorities”</li> </ul>
<b>Home Office response to the 2022 inspection</b>	
<p>“Internal communications around vulnerability have been improved and have [sic] an appropriately senior manager leading work to bridge the vulnerability and intelligence pieces.”</p> <p>“An awareness campaign has taken place, with a newsletter for staff now regularly circulated to inform them of the characteristics of those who have arrived via small boats.”</p> <p>“CCTC has created an additional role to improve the link across to Intelligence teams and networks. The postholder will work closely with intelligence partners to understand the upstream threat posed by illegal migration and how this is likely to adapt in response to both international developments and UK action.”</p>	
<b>Home Office Service Improvement Plan 2023</b>	
<p>Additional developments:</p> <ul style="list-style-type: none"> <li>“Vulnerability and Safeguarding criteria has been shared widely with staff. We are also working closely with A&amp;P colleagues to facilitate a Trauma Informed Pilot, which is focussed on enabling staff to take a trauma informed approach, whilst processing arrivals in their care.”</li> </ul>	

- “All staff and stakeholders have been issued with the safeguarding referral form (Annex B), so that all safeguarding referrals are submitted in the same format., [sic] regardless of the nature of the referral and who dealt with them, and the level of intervention required. This information is [sic] collated on a password protected spreadsheet, and from this we are able to identify trends or emerging concerns. By linking in with GSA who undertake the screening interviews, we are also able to identify cases we have potentially missed, and we can use this information to further develop staff.”<sup>44</sup>
- “We are using this information to create further “bite-size” sessions to deliver to staff during quiet weather windows.”

**7.19** Inspectors found that there were several improvements that had just been, or were about to be, put in place to improve awareness of staff around vulnerabilities and safeguarding and to improve the collection of information about migrants. Among the most notable was the recent appointment of an experienced safeguarding lead who told inspectors that their role was “to identify what processes are needed, how to put these in place and see what needs to improve”. But there is recognition that challenges remain: “Lots of little things have been put in place and we are trialling it as we go along. It hasn’t been particularly busy whilst I’ve been here so I’m not sure if what’s put in place will work when busier.”

**7.20** Senior staff told inspectors that some processes around recording, handling, and referral of vulnerability, safeguarding, and intelligence information are still being designed, and that they recognised systems must be designed to work for busy staff. A senior manager told inspectors:

“We are conscious of too much information being sent to officers. We are looking at the opportunities to make sure that it is read – we can use SharePoint, briefings and there are guides that we have created. One of the issues that I have is how I get that information and intelligence to the frontline officers in a way that can be absorbed by them.”

**7.21** The Home Office provided inspectors with a copy of the safeguarding referral form referred to in the 2023 Service Improvement Plan. This form lists 12 types of referral:

- “Domestic Abuse
- PVOT [Potential victim of trafficking]
- Child Neglect
- Physical Disability
- Mental Health concerns
- Pregnant
- Learning difficulties
- Self-harm /suicide attempt
- FGM [Female genital mutilation]
- Substance abuse
- Claimed family connection and
- Other.”

<sup>44</sup> GSA: Global Secure Accreditation, the contractor whose staff undertake asylum screening interviews.

- 7.22** The form provides a simple method for staff to refer safeguarding concerns to the new SBOC safeguarding team via email. However, its usefulness depends on staff having the time and inclination to use it, and this is a concern for the safeguarding team. One member of the team said:
- “We’re not getting many forms back. Last week we should have got one, but it hasn’t come through. This slows the process down. It was a Mitie Care & Custody case of four children with a claimed mother, but there was concern she was not their mother – but no one filled out the form to refer it.”
- 7.23** The contractor undertaking asylum screening interviews, Global Secure Accreditation (GSA), copies the SBOC safeguarding team into any safeguarding referral forms it sends to the Border Force Safeguarding and Modern Slavery (SAMS) national team. Inspectors noted this was positive, as it links the SBOC safeguarding team with the national team and allows them to be aware of what is being picked up later in the migrants’ journeys. A safeguarding lead told inspectors how this is helping to improve their awareness: “We can then see what we could have picked up on.”
- 7.24** Border Force’s International Relations team collaborates with Home Office Intelligence to try to ensure potential intelligence is gathered from migrants arriving at WJF and passing through Manston. As with safeguarding, ultimately this work suffers because of a lack of capacity. A member of staff familiar with this work told inspectors: “Prevention work is less important to staff whose emphasis is on getting people through the process.”
- 7.25** The January 2023 Service Improvement Plan states that data regarding vulnerability is routinely being collated to identify trends or emerging concerns. Despite this, the Home Office was not able to provide any data on vulnerability and safeguarding referrals when this was requested by inspectors.



## 8. Inspection findings: data

### Collection and use of data

- 8.1** Owing to the strategic focus on the response to small boats, the operation receives numerous and varied requests for data. The high volume of migrants arriving at Western Jet Foil (WJF) and Manston means the sites are data-rich environments. At both sites, agencies collect and record information regarding the number and timing of arrivals, the personal information of migrants, migrant vulnerabilities and medical issues, intelligence and security concerns, and various aspects of migrant processing.
- 8.2** Multiple electronic systems are involved in the capture, recording, and use of this data. Upon arrival at WJF, aspects of a migrant’s reported personal information – including name, nationality, date of birth, age, and medical concerns – are collected into a ‘scribe sheet’ that is later transferred to an ‘Encounter Log’.<sup>45</sup> The Encounter Log is a separate spreadsheet held in a shared area on SharePoint, accessible to all operational staff working on the small boats response.
- 8.3** Information about migrants who arrive at Manston is also recorded on the Immigration Enforcement system called ‘Pronto’. Capture of biometric information is performed at Manston using the Biometric Recording Stations (BRSs) present in the ‘fire station’ room at that site. Additional tracking of migrants’ journeys and migrant processing is performed using further shared spreadsheets, such as the ‘Detention Log’ and ‘Case Progression Log’.
- 8.4** In addition to these sources of data, TagworX, a tracking system that relies on the wrist-banding of migrants, is in use at WJF and Manston. SBOC staff use TagworX to track migrants through different parts of these sites. When a migrant arrives at each part of the site, the location (for example a marquee) is manually scanned by Interforce staff. The QR code contained on the migrant’s wristband is then likewise scanned. The location of a migrant is then visible to some SBOC staff through dashboards that report TagworX data. However, no migrant personal information is stored on this system.
- 8.5** The 2022 inspection identified deficiencies in the reconciliation of data between systems used in the response to small boats and in overall data quality. The inspection report also noted gaps in the data collected, a lack of data assurance, and lack of clarity about who held overall responsibility for data oversight. The report therefore made four recommendations regarding data. The Home Office responded to these recommendations in July 2022 and later supplied a Service Improvement Plan (SIP), dated January 2023, outlining subsequent progress against the recommendations.

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<sup>45</sup> The scribe sheet is an Excel spreadsheet held on SharePoint (which enables documents to be accessed, and entries made, by required teams across the Home Office).

## Recommendation 3a – Data quality and assurance

### Recommendation from the 2022 inspection

3a “Within three months ... improve the quality of the information recorded in the Op ALTAIR Encounter Log, Pronto and CID, by establishing clear, minimum data entry requirements for biographic details, encounter, arrest and search records; and develop and implement an assurance regime for data collected about migrants, including contemporaneous spot checks on Pronto records by Bronze Commanders, with regular feedback to staff.”

### Home Office response to the 2022 inspection

“We accept this recommendation. A review of the collection, reconciliation and usage of small boats arrivals data identified a number of process and oversight improvements, which are currently being implemented, and clarified ownership responsibilities under a single SCS. In parallel, there is also wider work underway across the department to more closely track small boat arrivals through the system to monitor performance ....”

“It is acknowledged that the quality of information captured across systems needs to be standardised to become a single coherent narrative. Since the ICIBI inspection we have revised training/briefing material for CORT/frontline IE/BF officers to improve data quality by standardising entries on these systems, in order to ensure that every record has the same data fields populated in a consistent manner.”

“We also established an assurance mechanism, using random sampling, and this was in place by the end of March 2022. This enables us to reconcile any anomalous data and provide feedback to teams and individuals so that data quality is improved.”

### Home Office Service Improvement Plan 2023

Additional developments:

“To address issues surrounding the Encounter Log a project team from DDaT [Home Office Digital, Data and Technology] was commissioned to ... deliver [a] MVP [Minimum Viable Product] by the end of March 2023.”

- 8.6** The Home Office provided inspectors with a recent sample of data from the Encounter Log reflecting information recorded about migrants who arrived by small boat on 25 January 2023.
- 8.7** The Encounter Log is often accessed by several staff simultaneously. It is a large spreadsheet containing eight tabs, including a ‘master’ sheet. The ‘master’ sheet contains 70 columns and could, on a day with a large number of arrivals, include over a thousand rows. A fresh Encounter Log is created every day to record information about migrants arriving on that day.
- 8.8** Inspectors examined the quality of data held on the Encounter Log relating to migrants arriving on 25 January 2023. This consisted of 380 records. The names of migrants had been redacted by the Home Office. Inspectors therefore could not determine whether the names listed appeared plausible or if some records of migrant names contained numbers and special characters as was apparent in the data received during the 2022 inspection. The quality of data recorded about other aspects of migrant personal information reflected an improvement relative to the data accessed during the last inspection. All migrants had a gender recorded, and all but four migrants had dates of birth recorded. In all cases where a date of birth was provided, the listed age agreed with the date given. All migrants recorded as under the age of 18 were also marked as minors. Of those migrants with a date of departure from Manston recorded (264 records), all but two contained a plausible date and time of departure.



- 8.9** Seven records were duplicated within the Encounter Log data seen by inspectors. When asked for clarification, the Home Office responded that it “cannot explain” the duplications.
- 8.10** Assurance processes to enhance the quality of data collection, meanwhile, are informal and not mature. As covered in the discussion of vulnerability above, there is no data validation to standardize entries or flag obviously inaccurate entries. Information regarding age assessments was found in both the ‘vulnerability’ and ‘medical conditions/concerns’ column, while columns marked ‘disputed minor’ and ‘age assessment conducted’ were entirely unused.
- 8.11** Inspectors were told that Home Office operational managers undertake a random check of a proportion of entries in the Encounter Log to look for obvious data errors. At the time inspectors were onsite, this process had only very recently been restarted, having been curtailed as a result of operational pressures in late summer/early autumn. Prior to the reintroduction of that process, the Bronze Commander held a generalized responsibility for informally overseeing the quality of data on the Encounter Log. Inspectors requested information regarding data assurance activity currently ongoing within SBOC but received no such information or data.
- 8.12** While the quality of the Encounter Log data appeared to have improved relative to the last inspection, some weaknesses remain and, furthermore, inspectors saw little evidence of any formal assurance process that might further enhance data quality.
- 8.13** Of more concern to SBOC staff than the quality of data collected was the overall reliability of data collection and recording systems. As noted, the Encounter Log is a spreadsheet that is held in SharePoint and is available to all SBOC staff. A Border Force officer (BFO) estimated that up to 40 staff might add or edit the data on the Encounter Log at one time and characterised the system as “horrific”. Senior managers and operational staff agreed that the Encounter Log is fragile and vulnerable to crashes. On one such occasion, a crash resulted in the loss of data that had been entered into the log over a three-hour period.
- 8.14** Both operational staff and managers likewise expressed reservations about the appropriateness of Pronto in a border’s environment. As noted, Pronto is an Immigration Enforcement system, but has remained in use at WJF and Manston despite the movement of SBOC from that directorate into Border Force. Multiple senior managers reported concerns as to whether the system was “right” for the sites and in general about how much value it provides. Reflecting SBOC’s ongoing large-scale recruitment and its recent transition into Border Force, inspectors spoke to several operational staff who had only recently had training on Pronto or had not yet been trained in it. Operational staff reported finding Pronto user-friendly and – notwithstanding a national outage while inspectors were onsite – stable. The wider matter of Pronto’s value to SBOC, however, appears unresolved. One senior manager suggested that if, as planned, Pronto is developed such that information entered into it will also be reflected on Atlas, this will enhance its utility at WJF and Manston.

Recommendation 3b – Data review	
<b>Recommendation from the 2022 inspection</b>	
3b	“Within three months ... commission a review of the collection, reconciliation and usage of data related to migrant arrivals via small boats.”
<b>Home Office response to the 2022 inspection</b>	
“A CCTC-led review of how data relating to small boats arrivals is captured, input and reconciled was completed in June 2022 and implementation of a series of process improvements is underway. On usage, work on improving the retrieval and sharing of data between HO systems is being undertaken by DDAT. This wider piece of work continues.”	
<b>Home Office Service Improvement Plan 2023</b>	
Additional developments: “A CCTC-led review of how small boats arrival data is collected and reconciled is underway and will complete by end April 2022 [sic]. On usage, work on improving the retrieval and sharing of data between HO systems is being undertaken by DDAT.”	

- 8.15** As noted in the Home Office’s response to the recommendations made in the 2022 inspection report, CCTC conducted a review of its data collection, reconciliation, and usage in April 2022. The Home Office provided inspectors with a PowerPoint file comprising six slides that reflected the output from this review. These slides provide high-level process maps showing current and planned data collection processes, and identifying risks and limitations upon capacity. Despite the review, there remains a sense among senior managers that much work remains to be done to develop the level of sophistication of data collection, reconciliation, and use at WJF and Manston. One senior manager commented on the need for a “really strong data strategy” across the sites. A recently appointed senior manager commented on their desire to develop the data picture within SBOC by, for instance, “building data repositories and linking existing data to create dashboards”. This manager expressed frustration that SBOC, in common with many areas of the Home Office, was “horrendous” in its collection and use of data.
- 8.16** Several senior managers reported to inspectors that enhancing the collection and use of data had been – in common with many other areas of work – an activity that had been inhibited by the strain of day-to-day operational work in the summer and autumn of 2022 and by changing priorities. Multiple senior managers commented on the receipt by SBOC of requests from outside the business to provide information it did not hold. One manager related this to changing political and public interest in different aspects of migrant demographics and vulnerabilities, and suggested that the need to supply such information frustrated attempts to adopt a more strategic approach to data.
- 8.17** A senior civil servant told inspectors that the Home Office Digital, Data and Technology (DDaT) data review referred to in the Home Office’s response to the recommendations of the 2022 inspection was still ongoing. Home Office DDaT also continues to work with SBOC on the development of TagworX and of a web-based version of the Encounter Log, and in supporting the transition away from Ministry of Defence systems.
- 8.18** From the information provided to them, inspectors concluded that senior management has a better understanding of the importance of good data use and collection relative to the findings of the 2022 inspection. Managers are enthusiastic about undertaking work to improve the quality of data collection and to use and assure that data more effectively. The unmet need for

a single, reliable data source is widely and urgently felt. However, inspectors noted – and senior managers themselves acknowledged – that this work to enhance the collection and use of data is at a relatively early stage when considering the complexity and volume of data collected across the Manston and WJF sites.

<b>Recommendation 3c – Data governance</b>	
<b>Recommendation from the 2022 inspection</b>	
3c	“Within three months ... identify an SCS [Senior Civil Servant] to be responsible for all data related to small boats.”
<b>Home Office response to the 2022 inspection</b>	
“The review at 3b) considered oversight arrangements and whether changes were needed to existing SCS responsibilities. The review identified a single SCS owner for the collection, reconciliation and usage of small boats arrival data, and recommended additional governance arrangements to improve oversight.”	
<b>Home Office Service Improvement Plan 2023</b>	
Additional developments: “With Military Primacy ending on the 31st January 2023 and the establishment of the Small Boats Operational Command & the Manston Site Team, means [sic] that we are reviewing SCS responsibilities around data ownership. To be concluded by end of February 2023.”	

- 8.19** While the Home Office’s response to the recommendations of the 2022 inspection indicated that a single senior civil servant had been given overall ownership for collection, reconciliation, and use of small boats data, senior managers told inspectors during this inspection that in fact this had not occurred. The material regarding the CCTC review of its data processes seen by inspectors made no reference to data governance arrangements.
- 8.20** A senior leader told inspectors that it was not practicable to bring responsibility for all data under the ownership of a single senior civil servant. Currently, responsibility for data at the WJF and Manston sites is split between three senior members of staff. Responsibility for historical data and data relating to the number of arrivals by small boat sits within SBOC’s Illegal Migration Strategy team. Responsibility for operational data rests with both the SBOC Landside Response team and with Manston Headquarters.
- 8.21** The division of responsibilities between those owning historical and arrival-related data on the one hand, and ‘live’ operational data on the other, appears clear. A senior manager told inspectors that, while the Illegal Migration Strategy Team assists those responsible for operational data periodically, its primary function is to forecast and track overall numbers of arrivals by small boat and of those leaving Manston. This clear division of responsibility does, however, bring with it a risk that different sets of data might not always reconcile. Inspectors noted that, while the Encounter Log data for migrants arriving on 25 January 2023 contained 380 migrant records, this differed from the number of arrivals listed in the Home Office’s ‘Migrants detected crossing the English Channel in small boats’ transparency data. That document gives this figure as 321.<sup>46</sup> Inspectors asked the Home Office to explain this discrepancy and were informed that the Encounter Log contained duplicate records and that the transparency data on migrant arrivals had erroneously recorded some arrivals

<sup>46</sup> Home Office and Border Force, ‘Migrant detected crossing the English Channel in small boats – last 7 days’ (published 1 February 2023, last updated 18 April 2023). <https://www.gov.uk/government/publications/migrants-detected-crossing-the-english-channel-in-small-boats>

on 25 January 2023 as having occurred on 24 January 2023. This has not been revised subsequently.

**8.22** With respect to responsibility for live operational data, meanwhile, senior managers conveyed a less clear picture. One recently appointed senior civil servant reported that they had not yet managed to fully establish who had ownership of various data strands. They were, for example, unsure who was responsible for managing the scribe sheet on which the Encounter Log’s data is based.

**8.23** In summary, the Home Office has not nominated a single senior civil servant to hold responsibility for data on small boats, despite the department’s suggestion in its response to the 2022 inspection report that it had already done so. A senior manager articulated a clear business justification for this, but the apparent acceptance, implementation, and then rejection of this recommendation itself reflects a potential lack of clear and consistent thinking around data ownership.

<b>Recommendation 3d – Data integration</b>	
<b>Recommendation from the 2022 inspection</b>	
3d	“Within three months ... design and implement a robust and auditable methodology to establish a single, comprehensive, contemporaneous, accurate database of information relating to migrants’ arrivals and initial processing performance.”
<b>Home Office response to the 2022 inspection</b>	
“It is accepted that data on processing performance relating to migrant arrivals required improvement. There is a comprehensive programme of work ongoing (Project Aspen) which seeks to bring together multiple databases, and track migrants through the WJF/Manston process.”	
“Work started in January 2022, and a pilot of a new wristband barcode tracking system began this week (week commencing 18 July 2022). We will continue to work with DDaT to use this product to inform the development of a single system that is compatible with, and can write-back to existing HO systems. The next iteration is due to deliver in autumn 2022.”	
<b>Home Office Service Improvement Plan 2023</b>	
Additional developments:	
“We are establishing whether such a database would be feasible or whether the recommendation’s requirement would be better met by adapting existing databases and their functionality to monitor initial processing performance. Should a new database be necessary and feasible, we would plan to design the operational requirement and initiate it as a project by the end of May 2022 [sic]. Separately, the Home Office is currently engaged in modelling the end-to-end journey of irregular migrants through the immigration and asylum system, identifying dependencies and factors which militate against a smoother and faster flow with the aim of creating an end-to-end Illegal Migration Capacity plan. This plan, which directly affects WJF and Manston, is due to be finalised in April 2022 [sic] and we will use it to guide capacity planning for Manston.”	

**8.24** The need for clear ownership of various strands of data activity across both sites is amplified by the number of agencies involved in recording and using data in those environments.

- 8.25** There are a number of systems and documents into which data is entered across the sites. As noted, the Encounter Log is itself built from an initial record of migrant personal information known as a scribe sheet. Sections of data from the Encounter Log are used to build ‘bulk lists’ that contain information used when migrants are dispersed between locations. Migrant information is further added to Pronto. SBOC officers are currently inputting migrant processing information into both CID and Atlas. Mitie Care & Custody, meanwhile, retains its own data for use in its custodial and detention work. While the TagworX system does not hold migrant personal information itself, it provides data indicating where migrants are around the WJF and Manston sites and how long they have been on the sites or in particular parts of them.
- 8.26** In its response to the recommendations made in the 2022 inspection, the Home Office in July 2022 declared that it had begun “a comprehensive programme of work”, under Project ASPEN, “to bring together multiple databases and track migrants through the ... process”.<sup>47</sup> However, the service improvement plan provided to inspectors as constituting an update on the progress since July 2022 suggested that SBOC was seeking to determine whether creation of a single database was “necessary and feasible”. During this inspection, a Grade 7 (G7) manager confirmed to inspectors that Project ASPEN had come to be seen as overly complicated and was abandoned. This inconsistent or shifting approach to data integration suggests that a lack of clarity about the overall data strategy for WJF and Manston persisted after the 2022 inspection.
- 8.27** In the absence of the single comprehensive database envisioned by Project ASPEN, both managers and operational staff expressed concern about the complex constellation of data and systems across WJF and Manston. Several managers noted the need for a “single version of the truth” – a single reliable and comprehensive data source. The weakness of data integration resulted in conflicts in the data and a duplication of effort in circumstances where multiple agencies spent time recording substantially the same or overlapping data. One G7 manager also told inspectors that business areas and agencies working with incomplete data pictures were required to make data requests of each other, drawing on management time. A recent review of the Manston operation also highlighted the view among contractors that data was not shared with them.
- 8.28** Inspectors observed issues in the quantitative data provided to them that appeared to originate from this lack of a single, reliable data source. As noted above, there is evidently the potential for inconsistencies to arise between Encounter Log data and the Home Office’s public transparency data on the number of migrant arrivals by small boat on a given day. Likewise, the Encounter Log data for 25 January 2023 suggests that 66 migrants departed Manston on that date (although one of these is listed as having departed on 25 December 2023, which is presumably a typographical error). However, the Home Office provided a separate document to inspectors suggesting that 70 migrants left Manston on that day.
- 8.29** To address such inconsistencies, and in the absence of Project ASPEN, senior managers emphasised the benefits that will accrue from the introduction of TagworX. There is an ambition for TagworX to be “all singing, all dancing” and to provide staff with “everything we need”. While inspectors did not see the data produced by the system, it is evidently still reliant on the manual scanning of QR codes printed onto migrant wristbands. Managers told inspectors that these scanners sometimes malfunction, and that the process remains vulnerable to human error. Senior managers gave conflicting accounts as to whether TagworX is yet providing ‘real time’ data. Regardless, senior managers clearly consider that the system is

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47 Home Office, ‘Response to ICIBI report on small boat arrivals at Tug Haven and Western Jetfoil’.

in its early stages. There are ambitions for it to operate through radio-frequency identification rather than manual scanning and to link migrants to their physical property. However, there were inconsistencies in the information provided to inspectors regarding the timescales for this. In any case, the Home Office confirms that no migrant personal data is held on TagworX; while this remains the case, the system must work alongside others that do hold such data.

**8.30** Data integration and reconciliation has evidently persisted as an issue affecting the processing of migrants at WJF and Manston since the time of the last inspection. While much emphasis is placed on the potential for TagworX to meet the operation's data integration needs, this system is still in relatively early stages of development. Moreover, the system and other new aspects of data collection and usage have not yet been 'stress-tested' during a period in which daily arrival numbers consistently meet or exceed the peaks seen in 2022.

## 9. Inspection findings: staffing

### Small Boats Operational Command

- 9.1** When the 2022 inspection took place, the Clandestine Operational Response Team (CORT) had responsibility for frontline duties at Tug Haven and Western Jet Foil (WJF). CORT comprised 14 staff, working on a shift basis each day, requiring ‘supplemental’ staff from other areas of the Home Office to assist with the demands of the operation. The 2022 inspection noted “resources (skills and numbers) were not always effectively balanced with the volume of migrant arrivals”.<sup>48</sup>
- 9.2** The Small Boats Operational Command (SBOC) took over the functions of the CORT in December 2022, and in January 2023 it comprised 213 permanent staff and 13 temporary staff, with vacancies for an additional 149 staff.
- 9.3** As numbers of SBOC staff increase, it should become self-sufficient, and the Home Office then plans to permanently reduce the number of surge staff requested from both Immigration Enforcement (IE) and Border Force (BF), to cover operational activity where arrival numbers are too high for the Landside Operations team to manage.
- 9.4** The move from Immigration Enforcement to Border Force for SBOC was considered beneficial by senior managers for several reasons. Although WJF and Manston are not official ports of entry, WJF is a point of entry for migrants. As Border Force has the remit to conduct entry checks to the UK, it is more fitting that it should handle these arrivals. Border Force is also a larger organisation, providing a greater pool of staff who are able to travel to their ‘place of work’ outside of their shift hours, unlike Immigration Enforcement staff. This enables Border Force officers to complete full shifts at the sites.
- 9.5** The Home Office informed inspectors that a priority for 2023-2024 was “to continue expanding SBOC through an ambitious recruitment programme”. The Home Office recognises it faces significant challenges with its plans to recruit approximately 750 additional staff for SBOC, due to the highly competitive labour market in the region, from which other parts of the BF and contractors at WJF and Manston are also seeking to recruit. This challenge, as well as the length of time it takes for essential security checks to be completed, means that the recruitment plans for SBOC appear highly ambitious. Recruitment will require intense focus by senior leaders in the Home Office in order to be successful.

### Stand-up levels

- 9.6** The 2022 inspection made a two-part recommendation on resourcing. The table below deals with recommendation 4a relating to stand-up levels. The Home Office responded to this in

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48 ICIBI, ‘An inspection of the initial processing of migrants arriving by small boats’.



July 2022 and later supplied a Service Improvement Plan (SIP), dated January 2023, outlining subsequent progress against the recommendations.<sup>49</sup>

### Recommendation 4a – Stand-up levels

#### Recommendation from the 2022 inspection

4a “Within three months review the operational staffing requirements for both CORT and supplemental staff and produce accurate and detailed Statements of Requirement (SOR).

Define and monitor:

- Stand-up levels: both the trigger point (i.e. predicted migrant numbers) and associated staffing requirement, considering both skills and numbers for each level.”

#### Home Office response to the 2022 inspection

“We accept this recommendation without reservation, and work is already in hand to address much of its substance. This takes into account the changes in processes (WJF and Manston), as will any involvement of the MOD in operations.”

“A review of the stand-up levels and work with partners to agree a more workable and sustainable arrangement for the stand-up was completed by the end of May 2022. We have reviewed numbers and skillsets required for the two-site model (WJF for SOLAS triage and Manston for initial reception), including consideration of whether simplification was needed of the levels of support against increasing volumes.”

“This review also included identifying how and from where suitably qualified staffing resources could be assured for all contingencies. While the review was completed by the end of May 2022, the operationalising of these SORs is taking longer, in line with our expectations at the time that this report was received in the Home Office.”

#### Home Office Service Improvement Plan 2023

Additional developments:

- “As of the 30th January 2023 a new three level stand up document was introduced (Annex C).”
- “Following on from the Mechanism of Government change on 07 Dec 2022 when CCTC was formally transferred into BF and renamed as Small Boats Operational Command, further work was commissioned to examine the structure and size of SBOC to ensure it has sufficient resources to respond to forecasted demand for 2023.”
- “Based on the 2022 arrival forecasts, CCTC (now SBOC) had been directed to expand its Landside Operations team to a target of 288 operational staff. Recruitment based on this direction is ongoing. Subsequently, and based on arrival figures over the summer of 2022, SBOC has been asked to start planning on increasing operational and non-operational FTE to meet the demands of receiving in and processing up to 1,600 migrant arrivals within a 24hr period. Pending the results of ongoing planning, SBOC expects to be directed to increase FTE staffing to c750 staff, with the majority (600) located within the Landside Operations command. The intent is to provide SBOC with sufficient resources to manage the entirety of SB-related operations without the need for reinforcement/surge staff from either Immigration Enforcement or other areas of Border Force.”

49 Home Office, ‘Response to ICIBI report on small boat arrivals at Tug Haven and Western Jetfoil’.



- “Detailed work to understand to [sic] requirement is underway but has not yet reported its findings at this time.”

9.7 The Home Office’s July 2022 response to this recommendation stated that the stand-up levels review was completed in May 2022. However, the resultant 3-level stand-up model which replaced the previous 5-level model, was only introduced on 30 January 2023. The switch to 3-levels was partly due to “the former model not accurately forecasting arrival numbers”. The new model is based on the forecast arrival numbers, the estimated number of boats making it to the UK or intercepted at sea, days that small boat crossings are possible and the average number of passengers per boat. Figure 8 sets out the number of migrants expected and the associated stand-up levels to meet that demand. The South East Immigration Compliance Team and the Readiness Task Force form part of the additional ‘surge’ staff.

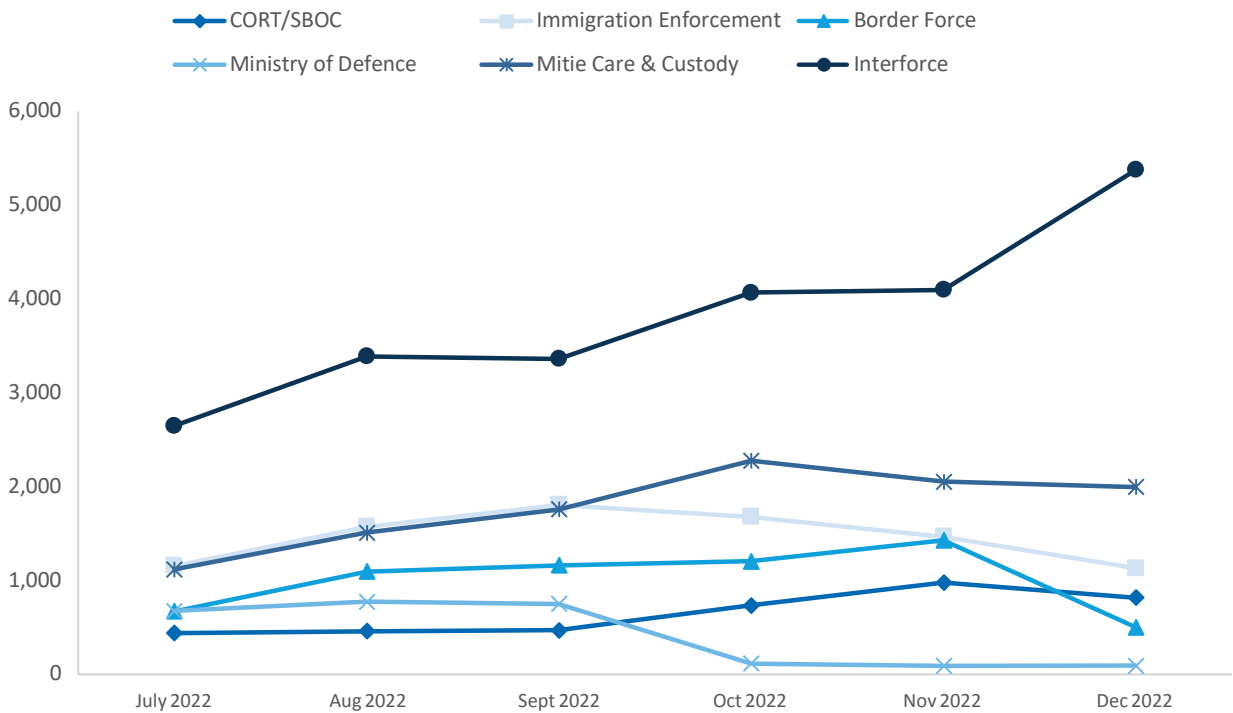
**Figure 8: Stand-up and resourcing levels**

<b>Level 3</b>				
<b>Between 0 and 125 arrivals or persons still to be processed</b>				
<b>TEAM</b>	<b>Early</b>	<b>Late</b>	<b>Night</b>	<b>Total</b>
Small Boats Operational Command	17	17	6	40
South East Immigration Compliance Team	0	0	0	0
Readiness Task Force	0	0	0	0
<b>TOTAL</b>	<b>17</b>	<b>17</b>	<b>6</b>	<b>40</b>
<b>Level 2</b>				
<b>Between 125 and 600 arrivals or persons still to be processed</b>				
<b>TEAM</b>	<b>Early</b>	<b>Late</b>	<b>Night</b>	<b>Total</b>
Small Boats Operational Command	17	17	6	40
South East Immigration Compliance Team	10	10	10	30
Readiness Task Force	10	20	0	30
<b>TOTAL</b>	<b>37</b>	<b>47</b>	<b>16</b>	<b>100</b>
<b>Level 1</b>				
<b>Over 600 arrivals or persons still to be processed</b>				
<b>TEAM</b>	<b>Early</b>	<b>Late</b>	<b>Night</b>	<b>Total</b>
Small Boats Operational Command	17	17	6	40
South East Immigration Compliance Team	10	20	20	50
Readiness Task Force	20	30	0	50
<b>TOTAL</b>	<b>47</b>	<b>67</b>	<b>26</b>	<b>140</b>

## Contractors

9.8 As figure 9 below shows, the operations at WJF and Manton have increasingly relied on contractors during the course of 2022. Most notably, Interforce have taken over from Ministry of Defence personnel. Interforce staff supervise migrants’ change of clothes and handle migrants’ belongings, as well as administering the TagworX tracking system.

**Figure 9: Number of staff days provided by different agencies at Manton and Western Jet Foil in each month July to December 2022**



9.9 As noted by the Independent Chief Inspector during his visit on 24 October 2022, the lack of sufficient Detention Custody Officers (DCOs), who are employed by contractors, meant that Home Office staff were required to perform DCO functions, limiting their ability to perform their substantive roles. There is a need to increase DCO numbers, particularly if migrants are to be detained for up to 96 hours, as enabled by the change to the STHF Rules to create the Residential Holding Room (see chapter 12, ‘Future plans’ for more details). Mitie Care & Custody staff told inspectors that there were “335 DCOs working to a four-shift system”, whereas a Home Office manager said they were “working with Mitie to increase their numbers to 330 from an original target of 230”. A senior manager told inspectors the Home Office was also working with another contractor, MTC, to attain a target of 90 DCOs (they were currently at 30 to 40), “so making good progress”, with the aim of having “430 by the summer of 2023”.

9.10 Although the Home Office wanted to move to a model of exclusively using DCOs to carry out custody functions, if more than 1,000 migrants arrive on any given day, the Home Office would need to use other contractors to manage non-custody related tasks.

9.11 To ensure appropriate staffing levels and coverage of DCOs across all short-term holding facility (STHF) and planned residential holding room (RHR) accommodation, administrative roles are also being considered through existing detention contracts. In its position statement, the Home Office set out that it “intends to ask suppliers to review the creation of a new role – that of Operational Support Officer (OSO) to carry out routine tasks that do not require the specific

training or skills of a DCO (who will be free to focus on security, safety and well-being activity). OSOs will receive basic training in breakaway techniques (PST2) and safeguarding.”

## Administrative support

- 9.12 The second part of recommendation 4 regarding resourcing related to administrative support and is addressed in the table below. The Home Office responded to this in July 2022 and later supplied a Service Improvement Plan (SIP), dated January 2023, outlining subsequent progress against the recommendations.<sup>50</sup>

<b>Recommendation 4b – Administrative support</b>	
<b>Recommendation from the 2022 inspection</b>	
4b	<p>“Within 3 months review the operational staffing requirements for both CORT and supplemental staff and produce accurate and detailed Statements of Requirement (SOR).</p> <p>Define and monitor:</p> <ul style="list-style-type: none"> <li>How and where consistent administrative support could improve operations at WJF.”</li> </ul>
<b>Home Office response to the 2022 inspection</b>	
<p>“By the time the report was submitted to the Home Office, we had already reviewed the skills and powers mix required for the reception phase at WJF and subsequently mapped where administrative support would provide the most value, and where we could lessen our reliance on surge support from Immigration Compliance and Enforcement (ICE) teams and Border Force.”</p> <p>“This piece was completed by the end of May 2022 and forms the template for our future administrative resourcing. We recognise the importance of improving administrative support and will prioritise recruitment. The highly competitive market and essential security checks on prospective new employees/contractors means that the transition to full administrative support is a slower piece, but it will be completed no later than December 2022.”</p>	
<b>Home Office Service Improvement Plan 2023</b>	
<p>Additional developments:</p> <p>“We have already reviewed the skills and powers mix required for the reception phase at WJF following the publication of the Irregular or Unlawful Entry and Arrival policy, and continually look for opportunity to reduce our reliance on surge support. We recognise the importance of improving administrative support and this is factored into our recruitment plans, and into our Continuous Improvement work where we are seeking to lessen the administrative burden through innovative and bespoke digital/tech solutions. The highly competitive market and essential security checks on prospective new employees/contractors continues [sic] to pose a significant challenge to timely recruitment. Full resolution expected no later than December 2022.”</p>	

- 9.13 In relation to increased administrative support, which was due to be addressed by December 2022, work is ongoing. A senior manager told inspectors: “I would partially accept this

<sup>50</sup> Home Office, ‘Response to ICIBI report on small boat arrivals at Tug Haven and Western Jetfoil’.

recommendation ... because if people are multi-skilled, we can consume that administrative work given the numbers we are recruiting.”

- 9.14** The Home Office has increasingly relied on contingent labour from contractors due to the difficulties with recruiting civil servants. With the withdrawal of the Ministry of Defence, the Home Office contracted an agency, Prevail, for six months, mainly to undertake co-ordination and intelligence functions, but also to provide an element of administrative support to SBOC and to help improve data capture at Manston. A senior manager told inspectors that, while this contract was an interim measure, the “long-term intention is to recruit civil servants when there is capability to do so”.
- 9.15** The Service Improvement Plan suggests that the administrative burden and therefore the need for administrative resource will be reduced “through innovative and bespoke digital/tech solutions”, but at the time of this inspection there had been little progress with such solutions. The Home Office may well need to consider what further administrative support might be beneficial to free up BFOs to use the skills for which they are trained.

## 10. Inspection findings: asylum screening interviews

- 10.1** In a change to processes observed during the 2022 inspection, asylum screening interviews for some migrants are now conducted at Manston. Screening interviews represent an important early opportunity to understand migrant vulnerabilities as well as to gather information regarding the basis of the asylum claim being made.
- 10.2** The National Asylum Intake Unit (NAIU) has a presence at Manston and oversees the screening interview process at that site. The primary responsibility of NAIU staff at Manston is to conduct Operating Mandate checks on migrants claiming asylum. Screening interviews at Manston are undertaken by a contractor, Global Secure Accreditation (GSA), whose staff work to the NAIU.
- 10.3** Migrants at Manston receive a screening interview only after they complete other stages of processing. Before being screened, migrants will have been served with an IS91 'Authority to detain' form, formally notifying them of their administrative arrest and detention, and will have had their biometric information enrolled. A case progression spreadsheet is used to task screening interviews to GSA, with more vulnerable migrants and families being prioritised. Migrants are escorted in batches by the security contractor MTC from detention marquees to the two buildings, 'Hurricane' and 'Spitfire', in which interviews are conducted. These buildings contain 33 interview rooms, though some of these are in practice used by other agencies, such as law enforcement.
- 10.4** A GSA operational manager informed inspectors that the team of screening interviewers comprises 36 staff working across three shifts. Screening interviews are conducted between the hours of 7am and 11pm. Inspectors observed that some staff are assigned to a 'co-ordination' role in addition or alternatively to their work as interviewers.
- 10.5** Both managers and operational staff told inspectors that interviews take an average of around 40 to 60 minutes to complete and that around 220 interviews could be conducted per day (there was no Service Level Agreement in place specifying a minimum number). These figures suggest that the 33 interview rooms are being under-utilised at present. Nevertheless, neither senior nor operational managers suggested that the NAIU was under-resourced with respect to screening interviewers. A GSA operational manager emphasised that bottlenecks in the system mean that migrants scheduled for interviews flow to their team slowly. They noted that delays can be caused to a screening interview during prayer and meal breaks, or by the general difficulty of locating a migrant on the large, busy site.
- 10.6** Given the under-utilisation of interview rooms, inspectors were surprised to note that the GSA resource deployed to Manston is also being used to support regional intake units by conducting remote screening interviews for asylum claimants who have arrived by means other than small boat. While such interviews are only scheduled from 4:30pm, this arrangement creates the risk that there will not be sufficient GSA screening interviewers to interview asylum claimants detained at Manston.<sup>51</sup>

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<sup>51</sup> In March 2023, in its factual accuracy response, the Home Office explained: "GSA contractors are redeployed to other regional asylum intake units only when there is no or reduced flow at Manston. This is to ensure efficient utilisation and value for money. Manston arrivals are always prioritised."

**10.7** The limitations on screening interview resource and slow rate at which migrants filter into screening interviews are reflected in the high numbers of migrants who depart from Manston without being interviewed. A senior manager within NAIU suggested that only 20 to 30% of migrants leave Manston having had a screening interview. Figures provided to inspectors show that 13.29% of migrants who left Manston on 24 January 2023 had had a screening interview and 64.29% on 25 January 2023. Figure 10 shows the number of migrants who left Manston without being interviewed in the second half of 2022. For context, 33,008 migrants arrived by small boat in this six-month period.

**Figure 10: Migrants leaving Manston without an asylum screening interview**

Month	Left without screening interview
July 2022	1,505
August 2022	4,967
September 2022	4,464
October 2022	3,860
November 2022	3,294
December 2022	833
<b>Total</b>	<b>18,923</b>

**10.8** Where migrants leave Manston without having received a screening interview, they are dispersed to hotels that are ‘ringfenced’ solely for those who have departed Manston without receiving a screening interview. The Home Office intends that such migrants then be screened at their hotel at a later date. However, GSA operational staff expressed concern at the high level of absconding from these hotels, particularly by migrants of certain nationalities. One screening interviewer suggested that some migrants have absconded from a hotel by the time they arrive there to conduct screening interviews.

**10.9** Notwithstanding such concerns, screening interviewers expressed a high degree of confidence in their ability to conduct effective interviews. One interviewer emphasised that they “always” asked additional safeguarding questions to understand migrant vulnerabilities and offered thoughtful comments about how to effectively build rapport with an interviewee such that they might comfortably disclose vulnerability. This interviewer also reported that they found the safeguarding referral process “straightforward”. While obtaining an interviewer of a specific gender if this were requested by an applicant would be “problematic”, staff were confident it could be done. A senior manager within SBOC confirmed that GSA staff were using the designated form to refer safeguarding concerns appropriately and that most of the completed forms they received came from that source.

**10.10** Likewise, a GSA operational manager felt confident that their interviewing staff knew when to make referrals both through the safeguarding process and to police. They felt that their staff – who are mostly former police officers – “know when to dig” and suggested with pride that their work had led to the issuing of “European arrest warrants” and to some arrests.

**10.11** Interviewing staff did, however, express concern that the safeguarding process at Manston “falls down”, inasmuch as they are not sighted on the actions that arise from their referrals, or given feedback on the quality or appropriateness of referrals. Screening interviews conducted

at Manston are subject to an overall quality assurance exercise in which a 'dip sample' is taken of each interviewer's work by NAIU staff and rated on a five-point scale.

- 10.12** While staff therefore do receive evaluation and feedback to improve the quality of their work, screening interviewers reported that they relied upon their previous professional experience to operate effectively. One interviewer suggested that their background as a police officer helped them to interview effectively and expressed concern that a colleague without such experience might struggle since, in their opinion, standard Home Office E-Learning packages were not sufficient in themselves. Interviewing staff therefore expressed a desire for a "proper programme of induction" for new interviewers.
- 10.13** Interviewers also expressed a desire for more and clearer communication about changes affecting their work. One GSA screening interviewer voiced particular frustration at the lack of clear communication regarding timescales for the switchover from CID to Atlas and the data entry requirements this placed upon them. Interviewers also indicated that policy changes, for example around how to process migrants not claiming asylum, were inconsistent, or unclear, or were made with the intention of simplifying the process by pushing applicants towards making an asylum claim.
- 10.14** The primary source of frustration for screening interviewers, however, was reported to be the systems and technology they are required to use in their work. Frequent losses of internet connection were reported, as well as occasional power outages. 'thebigword', the telephone translation service used when a physical interpreter is not available, was described by one interviewer as "intermittent". This interviewer also commented on the "dysfunctional" overall nature of the Manston site and the limited provision for staff wellbeing there.
- 10.15** Screening interviewers therefore appreciated the importance of their work and felt confident in their ability to refer vulnerability and security concerns appropriately and effectively. This favourable impression of their work was shared by management both in GSA and SBOC. However, interviewers were also clear that they were operating within environmental and technological constraints. They expressed concern about the multiple bottlenecks that can delay their work, and about the limitations to inter-agency communication. Moreover, inspectors noted that only a small proportion of migrants leave Manston having completed a screening interview. When coupled with the reported high rates of absconding from ringfenced hotels, this creates a risk that migrant processing is not meeting expectations and that vulnerability and security concerns are not being fully understood at the earliest possible time.

## The non-asylum process

- 10.16** A senior Small Boats Operational Command manager informed inspectors that processes at Western Jet Foil (WJF) and Manston were devised under the assumption that all migrants arriving on small boats would claim asylum. While a large majority of arrivals did in fact do so, in summer 2022 around 10% of migrants travelling by small boat did not make an asylum claim, with that figure reaching as high as 22% in some weeks. A separate 'non-asylum' process has been developed for such migrants, though staff across grades and functions reported that this process is shifting and unclear; see figure 11. Owing to this lack of clarity, migrants not claiming asylum are likely to remain at the Manston facility for a longer period of time.

## Figure 11: 'Non-asylum' process at Manston

### 'Non-asylum' process at Manston

A migrant arriving by small boat might announce an intention to claim asylum at any point in the process. In practice, this occurs most often at the Manston 'fire station' during biometric enrolment. At that point, Border Force officers conduct a short conversation with migrants, assisted by an interpreter, and ask whether a migrant intends to claim asylum.

A migrant not claiming asylum will therefore be subject to the same processing steps as a migrant who does claim asylum up to and including the point of biometric enrolment. These processing steps include an initial safeguarding triage, wristbanding, a wand search, change of clothes, bagging of property, taking of biographical details, administrative arrest under S17, photographing, and a personal search under S25b. Migrants not claiming asylum will, like those who do intend to claim, be able to seek medical assistance.

Once a migrant expresses an intention not to claim asylum, however, he or she is referred to the Border Force officer in charge. The migrant will then receive a mitigating circumstances interview and be referred for Border Force caseworking on Atlas. This results in non-asylum claimants being served refusal paperwork and issued with removal directions. Like other migrants, those not claiming asylum are subject to Operating Mandate checks. Thereafter, non-claimants are bailed to an Immigration Removal Centre (IRC). If no space is available at IRCs and a migrant's Operating Mandate checks have been completed, they might be bailed to an address of their choice.



# 11. Developments at Manston since October 2022

## Independent Chief Inspector's 24 October 2022 visit

- 11.1** The Independent Chief Inspector made a visit to Manston on 24 October 2022 to get a first-hand view of the situation. On that date, the capacity of Manston was 3,200, with 2,800 migrants onsite, a further 190 arriving from Western Jet Foil (WJF) and 24 migrants in transit between WJF and Manston. The original design capacity of Manston was 1,600 migrants. The 'inflow' to Manston was described by senior managers and officials as "overwhelming". According to senior staff approximately 45% of those onsite were believed to be Albanian nationals, but managers were unable to provide the total number of women or children onsite.
- 11.2** On the day of the visit, there were eight interpreters on duty working a 12-hour shift, from 10am to 10pm. The provision of interpreters depended on availability and the 'stand-up level' of staffing.
- 11.3** Senior managers informed the Independent Chief Inspector that the average outflow of migrants was 137 per day around the time of his visit, which resulted in migrants remaining in Manston much longer than they should. This was, according to senior managers, partly due to a lack of onward accommodation. The Independent Chief Inspector observed migrants being held in all the buildings that the Home Office deemed habitable, including marquees, an old mess hall, a former social club, and the officers' mess. On the ground floor of the officers' mess, there were approximately 150 single adult migrants, while the first floor housed families in individual rooms with beds.
- 11.4** There were approximately 1,000 staff onsite each day at this time. This figure included Clandestine Channel Threat Command, Border Force, Immigration Enforcement, contractor staff, and catering staff. Of the 2,800 migrants at Manston, 400 were guarded by Detention Custody Officers (DCOs), while the remaining 2,400 migrants were guarded by immigration officers. The Independent Chief Inspector was alarmed by the lack of adequately trained detention staff, noting that contractor staff with Security Industry Authority (SIA) accreditation did not have the required skills to deal with large numbers of detained migrants and the associated risks that this entailed.<sup>52</sup> The Independent Chief Inspector immediately arranged to speak to His Majesty's Inspectorate of Prisons and wrote to the Home Secretary that evening to alert them both to the situation he had observed (see Annex D).<sup>53</sup>
- 11.5** Senior managers told the Independent Chief Inspector that the aim was for DCO-trained contractors to guard all marquees, but that was not possible due to recruitment and training issues that the contractor was facing.

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<sup>52</sup> The Security Industry Authority (SIA) is the regulator of the UK's private security industry. SIA is an executive non-departmental public body, sponsored by the Home Office.

<sup>53</sup> UK Parliament, Home Affairs Committee, Formal meeting (oral evidence session): Channel crossings (Wednesday 26 October 2022). <https://committees.parliament.uk/event/14980/formal-meeting-oral-evidence-session/>

- 11.6** At the Home Affairs Select Committee on 26 October 2022, the Independent Chief Inspector described how he spoke to three migrant families during his visit. One family had been residing in the same marquee for 32 days, during which time they had been sleeping on the floor. The two other families had been at Manston for two weeks and the mother of one of these families became “terribly distressed”, begging to be moved from the site. There appeared to be no outdoor space for them to use, and they had not been informed how long they might have to stay at Manston, in conditions described by the Independent Chief Inspector as “pretty wretched”.<sup>54</sup>
- 11.7** The catering provider had recently been changed to provide more nutritious meals. Previously, all food was provided via a mobile catering unit which only had the capacity to provide fast-food type meals, such as burgers, sausages, chips, and on occasion, a curry. It was acknowledged that this provision was not appropriate for migrants who had been on site for a protracted period of time, and was leading to unrest before the change of provider.
- 11.8** A senior manager stated that a doctor was based at Manston full time. His first day was the day of the visit.<sup>55</sup> The doctor wanted to create a four- or five-bed ward with en-suite facilities to minimise the spreading of infectious diseases. In the two months prior to the Independent Chief Inspector’s visit, four of the 11,000 people who had been through Manston had been diagnosed with diphtheria.<sup>56</sup> Senior managers explained that streptococcus was more prevalent than diphtheria and as a result there were “a lot” of people with tonsillitis. Golf-style buggies had been introduced to transport medical staff around the site for use in an emergency.
- 11.9** The Independent Chief Inspector observed that blue plastic bags holding migrants’ property were stored outside in unsecured locations, and that rubbish and building materials had not been cleared properly from portions of the grounds.

## February 2023 inspection update

- 11.10** The Independent Chief Inspector accompanied the inspection team on two of the onsite days of this reinspection (24 January and 2 February 2023) to observe what improvements had been made since his visit to Manston on 24 October 2022.

## Capacity

- 11.11** Migrants were present at Manston during two of the four days inspectors spent onsite. On 25 January 2023, a total of 326 migrants arrived at Manston according to the Home Office’s ‘Migrants detected crossing the English Channel in small boats’ transparency data. Between 24 and 25 January, a total of 228 migrants left Manston. In contrast to the Independent Chief Inspector’s visit in October, inspectors’ observations took place at a time when migrant arrival numbers were low, and the system and site were not under pressure.<sup>57</sup> Nevertheless, three migrants who were present on 25 January remained there for more than 24 hours. None of the three had initially claimed asylum, though one subsequently did, the longest being detained for 37 hours and 9 minutes.<sup>58</sup>

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<sup>54</sup> UK Parliament, Home Affairs Committee, Formal meeting (oral evidence session): Channel crossings (Wednesday 26 October 2022).

<sup>55</sup> In March 2023, in its factual accuracy response, the Home Office explained that the provision of emergency department doctors commenced on 12 October 2022.

<sup>56</sup> Diphtheria is a highly contagious infection that affects the nose and throat, and sometimes the skin. Diphtheria can be a serious illness and sometimes fatal, especially in children, if not treated quickly. Vaccination can prevent it. Source: NHS.UK, accessed 9 February 2023. <https://www.nhs.uk/conditions/diphtheria/>

<sup>57</sup> Inspectors were onsite at Manston 24 to 25 January 2023 and 1 to 2 February 2023.

<sup>58</sup> Two migrants were classed as ‘non-asylum’, the third was initially ‘non-asylum’ then made a claim for asylum.

**11.12** At the time of the inspection, migrants were being housed solely in marquee accommodation, with other buildings that had been deemed habitable no longer used to house migrants. These marquees were observed to be warm, dry, clean, and with rigid sides. While at Manston, inspectors noted the decommissioning of old soft-sided marquees, which were due to be replaced by improved, hard-sided marquees.

## Communications with migrants/interpretation

- 11.13** The electronic display screens providing information to migrants in the fire station reception hall now included additional messages. Messages on the screens informed migrants that they would be asked about their reasons for entering the UK; notified them that a voluntary diphtheria vaccination programme was offered onsite; and encouraged them to drink water, request hot food if required, and seek medical attention if suffering from fuel burns or other injuries.
- 11.14** In addition to these messages, interpreters were available on site for use by officers if needed. Staff and some contractors also had access to a number of 'desk translators', mobile tablet devices with translation apps. Staff told inspectors that these had increased the ability to communicate with migrants and that, although the tablets were beneficial, there was room for improvement, as they did not contain all of the languages required.
- 11.15** Inspectors invited interpreters at Manston to share their experiences of working there, but they declined this offer.

## Sleeping accommodation

- 11.16** While at Manston, inspectors noted that during the day migrants were provided with blankets and padded 'custody mats' which were approximately 5cm thick. Contractor staff told inspectors that migrants slept in the same marquees that they had spent the day in and, although the capacity of the marquee was 100, there was only space to lay out 70 custody mats. An officer remarked that due to the relatively low number of migrants this had not yet been an issue, adding: "If all processes go well, within two hours of being in the marquee they were leaving for hotels."
- 11.17** Although they were not in use at the time of inspection, inspectors observed thicker sleeping mats ready for use in marquees designated for single adult male arrivals (see image 6).

**Image 6: Sleeping mats in marquees for single adult males**



**11.18** A senior manager told inspectors that the blankets that had been used were being replaced with sleeping bags which, for fire safety reasons, were closed with poppers rather than zips.

## Contractor staffing levels

- 11.19** During the inspection visits to Manston in late January and early February 2023, migrant numbers had greatly reduced from the time of the Independent Chief Inspector's visit in October 2022 when he had expressed concern that, given the numbers being accommodated, insufficient staffing levels and inadequate training could prevent safe operation of the site.
- 11.20** A manager from one contractor told inspectors that all its staff were trained to DCO level and staff were not permitted to work in the marquee without this. They added that there were never fewer than six staff in the marquee regardless of the number of migrants present and that the capacity of that marquee was 140 migrants, which would not be exceeded. When the marquee reached capacity, they had the ability to stop any more migrants entering, controlling the flow until more space had been created when migrants left that marquee.
- 11.21** Senior managers told inspectors about issues with some of the Security Industry Authority (SIA) -accredited contractors, which had resulted in a breakdown of trust and the subsequent banning of some contractors from site.<sup>59</sup> There had been reports of SIA security staff selling tobacco to migrants, filming within the perimeter of Manston, and using drugs onsite. In order to prevent banned security staff from re-entering the site under the employment of a different contractor, a centrally held spreadsheet had been produced to monitor the security clearance of all contractors, their SIA accreditation, and their permission to be granted access to site. Senior managers stated that, as a result of these issues, they were looking to move away from the use of SIA-accredited staff for site security and use more qualified staff with DCO training.

## Migrant wellbeing

- 11.22** After the completion of immigration processing, migrants were moved to a contractor-led and -staffed marquee. Inspectors observed contractor staff treating migrants with dignity and respect. Migrants appeared well looked after and content, albeit tired from the journey they had undertaken.
- 11.23** Inspectors observed marquees with clean toilet and shower facilities, which migrants could use whenever they wished. If a migrant wanted to wash or shower, the contractors would provide a clean, dry towel, as well as a 'shower welfare kit', which contained a facecloth, toothbrush, comb, toothpaste, and shower gel. Contractor staff in these marquees were all trained to DCO level, which included training on identifying vulnerabilities.
- 11.24** Senior managers were aware of the importance of migrant wellbeing and told inspectors of plans to bring religious leaders such as pastors and imams to Manston to assist. Although aware of the advantages a religious leader could bring to Manston and SBOC, inspectors observed a female migrant asking for a headscarf and being told that they were not available. Senior managers confirmed that headscarves were not available to female migrants, an issue previously highlighted in the 2022 inspection, and there were no plans to provide these.

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<sup>59</sup> The Security Industry Authority (SIA) is the regulator of the UK's private security industry. SIA is an executive non-departmental public body, sponsored by the Home Office.

## Catering

- 11.25** The Manston Recovery Plan set out a need for improved catering services that were more “culturally appropriate”, including more varied and nutritious meals and options that cater for different dietary requirements.
- 11.26** While at Manston, inspectors observed the provision of meals to migrants. Breakfast consisted of a yoghurt, cereal, fruit, and a carton of milk, while lunch was a chicken tikka wrap, a packet of crisps, a small cake bar or brownie, and a carton of fruit juice. Migrants appeared content with the food. Contractors told inspectors that outside of mealtimes migrants had access to basic snacks as well as hot and cold drinks.
- 11.27** Senior managers told inspectors that the catering was “much better” and that kitchens had been reinstalled in the barracks and would start providing culturally appropriate food “imminently”. As part of these improvements senior managers had procured ‘hot fridges’ allowing bulk produced frozen food to be brought to temperature and kept at that temperature for up to 72 hours. Senior managers added that there would be a selection of three to four different culturally and religiously appropriate meal choices daily from a menu that would change weekly. This use of hot fridges would enable up to 800 migrants to have at least one hot meal a day while also reducing food waste.

## Healthcare

- 11.28** The need for improved medical services was an issue highlighted in the Manston Recovery Plan that noted “the provision of improved medical services, including better health screening, is essential to ensure the health of residents and staff on the site”. Migrants were offered a diphtheria vaccination on a voluntary basis, which was administered by medical contractors in a separate marquee. In documents provided to inspectors, the Home Office stated that they have closer relationships with UK Health Security Agency (UKHSA) and that UKHSA has provided expert advice during outbreaks of contagious diseases. NHS Kent and Medway Integrated Care Board visited the site on 18 October 2022 and recommended improvements to infection prevention and control, general medical provision, and child health and wellbeing. A follow-up visit on 29 November 2022 found that improvements had been made but noted other areas required attention.
- 11.29** In its position statement SBOC stated:
- “Medical services are delivered through two separate but complementary contracts with external suppliers. In total, there are 8 paramedical/medical trained staff on site by day, in a fully equipped medical centre. In addition, there are 3 Emergency Department Consultant doctors providing clinical cover at the site; a consultant is on site during the day between 08:00-20:00hrs, with on-call cover provided overnight.”
- 11.30** The medical facilities at Manston were small and consisted of a triage room staffed by paramedics, a separate locked room that acts as a pharmacy, and another room containing one bed that can be used for resuscitation, which, due to size and confidentiality requirements could accommodate one patient at a time. Paramedics judged that the facilities were too small for the number of people requiring treatment. As of February 2023, no provision for mental health care was available onsite. Medical staff had an ambulance at Manston with the ability to “blue light” migrants to hospital if required.

- 11.31** Medical staff at Manston were able to issue prescriptions to migrants, but for safety reasons, migrants were only given the medication they need for that day. The prescription was linked to their wristband number and their photo to safeguard against a migrant overdosing, sharing, or passing on medication. This safety measure had been introduced to prevent migrants from switching wristbands to access medications not prescribed to them.
- 11.32** When a migrant was issued with a prescription or had received treatment, they were given an additional ‘medical wristband’ with information about treatments or medications they had received. Medical staff described the most common issues that they saw as “knocks, grazes and fuel burns”.
- 11.33** Medical staff told inspectors that they were confident that migrants’ medical issues and treatment needs are communicated to their onwards locations. Senior managers were aware of the importance for a migrant’s health needs to travel with them and be available to doctors and GPs elsewhere. A senior manager told inspectors they were trying to add migrants’ information to the Electronic Master Patient Index (eMPI) system to facilitate this.<sup>60</sup>
- 11.34** Medical staff and senior managers told inspectors of plans to convert the building opposite the current medical centre into “a mini-A&E”. It was planned that the building would contain a triage room, two cubicles, a sluice room and shower for the treatment of fuel burns, a resuscitation bay, a major injuries section, a minor injuries section, storage for medication, an ultrasound machine, maternity facilities, and some mental health facilities. A paramedic told inspectors that it was “hoped” that this ‘mini-A&E’ would be ready by summer 2023, although at the time of the inspection no work had started to fit out this building. One member of medical staff expressed their frustration by saying, “everything is always tomorrow when it comes to improvements”.

## Migrant property

- 11.35** The volume of migrant property in Manston in January and February 2023 was greatly reduced in comparison to the Independent Chief Inspector’s visit in October 2022. Inspectors observed migrant property bags that were waiting to be loaded on a coach that was taking migrants from Manston to their onward location. These bags were behind fences in a controlled area. Inspectors noted a large volume of migrant property bags in a ‘lost property’ store. This is addressed in more detail in chapter 6, ‘Inspection findings: security’.
- 11.36** Home Office documents state that there are “plans in place” for the creation of a property store to be erected with QR codes to track property in and out. The document did not contain information on progress that had been made or a completion date for the property store to be operational.

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<sup>60</sup> eMPI works by linking all the records for an individual patient held across several information systems to a single ‘gold standard’ patient identity record. It ensures any new patient registration or changes of name and address are recorded once and copied across to all the systems that need to know about them, Source: <https://dhcw.nhs.wales/providing-the-infrastructure/> accessed 9 February 2023.



## 12. Future plans

### Residential holding rooms

- 12.1** In January 2023, in response to the legal risk of detaining individuals in ‘holding rooms’ for more than 24 hours, the government amended the Rules relating to short-term holding facilities (STHFs) to create a new third category of STHF, a ‘residential holding room’ (RHR).<sup>61</sup> The main effect of the amendment is to make detention lawful, both by increasing the upper time limit on detention and by introducing qualifications to the specifications in the rules around access to facilities, standards for accommodation, and access to legal services. It is envisaged that the use of the RHRs will only be required in circumstances where there are unusually high numbers of migrants arriving, who cannot all be processed within 24 hours. This relaxation of requirements will require effective management oversight if safeguarding of those with vulnerabilities is to be assured.
- 12.2** Small Boat Operational Command’s future priority in terms of the detention accommodation is to enhance the standard of it, so it complies with the requirements of the RHR and STHF rules. Once Manston is procured by the Home Office, which was imminent in February 2023, planning permission can then be sought to build the permanent structures required, including “proper rooms with beds and showers”.<sup>62</sup> The old officers’ mess on the site is currently being “converted to provide up to 106 RHR places by the end of March 2022 [sic] and will also work to ensure that the nine barrack blocks can also be deployed from summer 2022 [sic]”. The intent is to create detention capacity of 3,200 through a combination of RHRs and non-residential short-term holding rooms.
- 12.3** The plan, although not yet finalised, is to have the STHF holding rooms (for those held up to 24 hours) and the RHRs (for those held up to 96 hours) managed by two different detention contractors. The Home Office anticipates that its revised one-year contracts with Mitie Care & Custody and with MTC (detention contractors) will place their relationship with the two suppliers on a clearer footing and allow for the introduction of key performance indicators (KPIs) to ensure maintenance of lawful detention. Further developments proposed to bring Manston in line with STHF Rules include installation of perimeter security, CCTV, and improved control of access to the site. The TagworX tracking system is to become automated through use of radio-frequency identification (RFID), which will involve installation of 37 arches strategically placed across the two sites to scan and monitor the inflow and outflow of the detainees.
- 12.4** The Home Office is developing longer-term plans to provide a 2024+ vision for the Manston facility. Some of the ideas for the future development of this site are focused on the welfare and needs of the workforce, including a gym and a staff restaurant, and possibly even onsite accommodation for staff.

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61 The Short-term Holding Facility (Amendment) Rules 2022 came into force on 5 January 2023 amending the 2018 Rules, including a new category of STHF – “residential holding room” means a short-term holding facility where a detained person may be detained for a period of not more than 96 hours unless a longer period is authorised by the Secretary of State.

62 The Home Office was completing the purchase of the Manston site at the time of the inspection and anticipated completion in March 2023.

**12.5** However, the development of the RHRs will not address the issues with processing capacity at Manston, and the Home Office will need to guard against the 96-hour RHR detention limit having unintended consequences, such as reducing the incentive, or the ability, to process arrivals within 24 hours.

## Efficiency initiatives

**12.6** The Home Office advised inspectors that the SBOC Future Planning and Capabilities Command (FPCC) is currently working with consultants “to improve the efficiency of operations and deliver a user-centred, efficient process at Western Jetfoil and Manston, putting users (arrivals, contractors, and staff) at the heart of everything we do”. This is focused on three key areas, which touch on some of the areas highlighted for improvement in this report:

- language and interpretation – enhancing access to interpretation services to provide an improved arrival experience and increased accuracy in data collection, speeding up overall processing times
- processing – encouraging lawful data sharing between organisations to reduce duplication of effort and exploring efficiency gains leading to a reduction in arrival processing times
- ways of working – prioritising staff wellbeing and strengthening stakeholder relationships to provide a supportive and collaborative working environment

**12.7** The Home Office is aiming to deliver this programme of work by early April 2023.

**12.8** The FPCC has a further strand of work focused on the training of its workforce, both for new starters and existing staff. It is currently developing learning pathways for staff “to build a highly skilled and resilient workforce that is able to flex across all elements of the SBOC operation and surge out to support the wider business when necessary”. The Home Office anticipates that this programme of work will be delivered over the course of the next year.



# Annex A: 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 and 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 paragraph 17 of Schedule 3 to the Equality Act 2010 (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.

# Annex B: ICIBI ‘expectations’

**Background and explanatory documents are easy to understand and use (e.g. statements of intent (both ministerial and managerial), impact assessments, legislation, policies, guidance, instructions, strategies, business plans, intranet and GOV.UK pages, posters, leaflets etc.)**

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

**Processes are simple to follow and transparent**

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

**Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent**

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

## **Decisions and actions are ‘right first time’**

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance
- They are reasonable (in light of the available evidence) and consistent
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

## **Errors are identified, acknowledged and promptly ‘put right’**

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective
- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from administrative reviews and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

## **Each immigration, asylum, nationality or customs function has a Home Office (Borders, Immigration and Citizenship System) ‘owner’**

- The BICS ‘owner’ is accountable for
  - implementation of relevant policies and processes
  - performance (informed by routine collection and analysis of Management Information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
  - resourcing (including workforce planning and capability development, including knowledge and information management)
  - managing risks (including maintaining a Risk Register)
  - communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
  - effective monitoring and management of relevant contracted out services
  - stakeholder engagement (including customers, applicants, claimants and their representatives)

# Annex C: Letter from the Home Secretary to David Neal, 8 December 2022



Home Secretary

2 Marsham Street  
London SW1P 4DF  
[www.gov.uk/home-office](http://www.gov.uk/home-office)

David Neal  
Independent Chief Inspector of Borders and Immigration

8 December 2022

Dear David,

Thank you for your time on 21 November, it was helpful to hear your views on several issues including Manston. I have considered your letter to my predecessor on 24 October and your conversation with the Minister for Immigration today, as well as the significant progress made in increasing the flow of arrivals from Manston into other accommodation since your visit.

HM Chief Inspector of Prisons (HMCIP) has recently reported on the short-term holding facilities at Manston<sup>1</sup>, and while this report pre-dated your observations in October, it outlined a series of priority and key concerns, which the Department is progressing, as outlined in the Service Improvement Plan (SIP), which will be published on the HM Inspectorate of Prisons website alongside the inspection report in due course.

It would however be helpful if you would follow up your own observations formally. I am therefore writing to formally commission you to include a review of Manston as part of your planned re-inspection of how the Home Office responds to Small Boat arrivals, noting the parameters below. This acknowledges section 48(2A) of the UK Borders Act 2007 which permits your scrutiny in an area that would otherwise be covered by HMCIP in accordance with the Prison Act 1952. I also request that in due course you report to me on this matter under section 50(1)(b).

**Timing** - To incorporate a review of Manston as part of your planned re-inspection of Small Boats indicated on your inspection plan for 2022/23.

**Terms of Reference** – In addition to your intended terms of reference for your re-inspection, your report should specifically assess the situation at Manston and improvements made to address the concerns you raised after visiting the site in October 2022.

<sup>1</sup> Report on an unannounced inspection of the short-term holding facilities at Western Jet Foil, Lydd Airport and Manston by HM Chief Inspector of Prisons 25-28 July 2022 ([justiceinspectorates.gov.uk](https://justiceinspectorates.gov.uk))

I would be grateful if you could acknowledge this commission and provide indicative timing for your planned re-inspection on the Home Office's response to small boat arrivals, to include Manston. My officials will work with your office to agree any formal announcements regarding this formally commissioned inspection in a way that respects your independence.

Yours sincerely,

A handwritten signature in blue ink that reads "Suella Braverman". The signature is written in a cursive, flowing style.

**Rt Hon Suella Braverman KC MP**

# Annex D: Letter from David Neal to the Home Secretary, 24 October 2022

The Rt Hon Grant Shapps MP  
Home Secretary  
2 Marsham Street  
London  
SW1P 4DF



24 October 2022

Dear Home Secretary,

I am writing to bring to your attention an urgent concern from observations I made following a routine visit to Manston earlier today. Specifically, the exceptionally high number of migrants held in detention conditions, guarded by staff who I understand are not trained custodians.

A senior Home Office official briefed me that of the 2,800 detainees who were in detention on the site, only 380 of them were being guarded by trained custodians, Detention Custody Officers (DCOs). The remaining number were being guarded by a mixture of Immigration Enforcement (IE) officers and contracted security staff, neither of which are trained DCOs.

Staff without detention training lack the capability to identify vulnerability, manage potential conflict and ensure the smooth running of the facility in compliance with legislation and international safeguarding mechanisms.

I was informed by a senior Home Office official that the average duration of detention for migrants at Manston is 14 days and that there are detainees who have been detained for up to a month. This is far in excess of the Short-Term Holding Facility (STHF) Rules and dangerously beyond the planning assumptions for the site.

This area is outside my remit as set out in the UK Borders Act 2007 and is the responsibility of His Majesty's Chief Inspector of Prisons, under Section 5 of the Prisons Act 1952. As such, I have copied this letter to Charlie Taylor.

I would be happy to discuss my concerns with you in person.

Yours sincerely,

David Neal  
Independent Chief Inspector of Borders and Immigration

# Acknowledgements

The inspection team is grateful to the Home Office for its co-operation and assistance during this inspection and for the contributions from the staff who participated.

## Inspection team members

Lead Inspector: Phil Insuli

Project Manager: Harry Palmer

Inspector: Paul Whitehead

Inspector: Amrit Bains

Inspector: Jed Fazakarley





