



association of **visitors** to
immigration detainees

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Tyson Hepple
Director General Immigration Enforcement
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30th March 2020

Dear Tyson Hepple,

We write in our capacity as members of AVID – the **Association of Visitors to Immigration Detainees** - a network of organisations providing support to people in immigration detention. Together, we support people detained in every single immigration removal centre, residential short-term holding facility and in some prisons in the UK. As such, we are in day to day contact with people held under immigration act powers around the UK and are writing to express our grave concerns about the Home Office's response on immigration detention in light of the COVID-19 crisis.

AVID wrote to Immigration Enforcement contacts by email on the 12th March to ask a series of questions on behalf of our members about the centralised response to the COVID-19 crisis. Despite several follow up emails since then, we are still waiting for a response to our substantive questions. Instead, we have been sent a link to the guidance on '[Coronavirus and immigration removal centres](#)' which was published on the gov.uk website on 24th March. We note that other guidance '[COVID 19 and other prescribed places of detention guidance](#)' was updated on the 26th March.

The measures outlined in these documents are woefully inadequate. By the time of publication, there was already a confirmed case in Yarl's Wood and reports of people displaying symptoms of the virus in other centres. We believe that the Home Office response to date has not been clear enough, has not been thorough enough, and was published far too late. As such, people in detention have been put at unnecessary additional risk.

In light of the urgency of the situation facing the people we support **we are calling for the immediate release of all those who remain in immigration detention**. This release should be effectively managed to ensure that no one is released into destitution or poverty, and so that everyone is given appropriate access to accommodation and basic services, including healthcare, in line with the [recommendations made by the Commissioner on Human Rights](#) (26th March).

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Until releases are facilitated and while the Home Office continues to hold people under immigration act powers during this crisis, we are asking for further information in relation to the following concerns:

- **Implementation of government guidance inside detention facilities:** we are hearing reports from people detained that social distancing measures are not being implemented in all communal areas and that it is increasingly difficult to carry out even the most basic of the government's recommendations i.e. hand washing, as the availability of soap and antibacterial gel is limited. On the 25th March, the Home Office outlined that it would make antibacterial cleaning agents available to all detainees "on request"¹. Given the severity of the current crisis and the way in which such viruses can spread far more rapidly in incarcerated settings, everyone in detention must immediately be given supplies of soap and antibacterial gel. They should not have to ask for this basic necessity at this time. All communal areas must be kept clean in compliance with advice from Public Health England, Health Protection Scotland and the NHS. The Government guidance on social distancing measures in our communities must be implemented immediately inside detention facilities. Given the nature of the incarcerated environment, consideration must be made as to how this can be applied to sleeping accommodation, all communal areas and most critically in canteens and washrooms, without infringing upon people's rights to time out of room, and their access to fresh air, exercise and meaningful activity.
- **Access to communications during this period of crisis:** As all visits to places of detention have been stopped, there is a greater reliance on telephone, skype/online video, and the internet, to maintain contact with friends, family, external supports and most importantly legal advisers. Given the long-standing problems with mobile phone reception in many centres, and with many confined to their rooms, people are reporting difficulties in maintaining decent phone contact at this time. Phone credit is an issue for many, and our member organisations are being asked to provide phone top ups, something which is unsustainable for voluntary groups. We are also hearing of restricted access to the internet suites, worries about using the internet suite in light of social distancing advice, and technical problems restricting the set up and availability of skype for legal visits. During this crisis, it is vital that communication is facilitated from within detention in a way that is as easy and accessible as possible. Resource must be heightened to meet increasing demand. This must include the increased availability of phone credit, particularly for those without financial means; lifting of restrictions on internet access, including the current ban on social media and online chat facilities; ensuring all places of detention have the technical and physical capacity to facilitate an increasing demand for skype and online video calling. Consideration must be given to the access afforded immigration detainees held in prisons, who at present do not have access to the internet or mobile phones.
 - Many AVID member groups are offering phone and skype support to their clients during this time. We ask that information about AVID members and the support they offer is made available to all those who remain in detention.
- **Continuing movements around the detention 'estate':** We understand that people are still being brought into detention from the prison estate, from other detention centres, or via 'lorry drops'. People arriving in detention from other countries which may have higher

¹ <https://detentionaction.org.uk/2020/03/26/press-release-over-350-released-from-immigration-detention-and-all-cases-to-be-urgently-reviewed/>

instances of the virus puts both staff and detainees at risk. Moving people between facilities also risks spreading the virus further.

- **Changes to the regime:** People in detention have told us that they are experiencing extreme restrictions on movement, ranging from extended periods confined to their rooms or in some detention centres being locked in their rooms. We have also heard that the chaplaincy services are not running in some centres, and that the internal shops have closed. Some centres have shortages of staff in key roles owing to self isolation, we are hearing reports of detainees having to take up service roles inside some centres. Restrictions on visits are also impacting on access to legal representation and to independent clinicians. These changes are contrary to several of the Detention Centre Rules (2001). We would ask that any changes to the detention regime are made with due consideration to the purpose of detention stated within these rules, which is to provide: *'secure but humane accommodation....in a relaxed regime with as much freedom of movement and association as possible'*.
- **Information and support provision for people in detention:** it is not clear to us if information on COVID 19 is being made available to people in detention in a language and format that they understand. At a very minimum, we would like assurance that the latest updates and public health guidance are being made available to all, and in languages and format that is easily understood. There are various external sources of information available in translation, for example [Doctors of the World have produced useful guides in a range of languages and the World Health Organisation information pages on the virus](#) are available in different languages. At this time it is vital that tailored information is made widely available, that it is reviewed on a regular basis, and that people are told where they can access support, advice and care for any concerns they may have during this time.
- **Information and support for those released:** Similarly, we are concerned that people being released from detention are not being provided with current information about support available to them, or how to stay safe and well during the COVID 19 crisis. We have very little information about the support being offered to people on release. We understand that local authorities have been advised to make emergency accommodation available to all, but in some areas this requires people to physically 'walk in' to access, whereas in others it can be done over the phone. Consideration must be made for those leaving detention in being able to access any emergency support.
- **Care pathways for those in detention with symptoms:** Although we raised these questions some time ago, we still have a lack of information on the care pathways for those in detention displaying symptoms of the virus and how places of detention are responding to the very real risk of infection spreading. How are staff identifying people with symptoms and what steps are being taken to protect both staff and people detained at this time? People in detention are understandably anxious that isolation is happening too late, resulting in high levels of stress and worry amongst the detained population. We are concerned that facilities for isolation/quarantine are inadequate, and it is not clear if those placed in isolation are able to maintain contact with friends, family or legal advisers, or what medical care is provided from within detention for those with symptoms of the virus. At this time of crisis, it is vital that there is transparency around infection rates, conditions and deaths from within detention as this situation unfolds.

We are already hearing alarming reports of high levels of anxiety and stress, and even self-harm, from inside detention. We are concerned that if the situation is not addressed with some urgency,

alongside the public health crisis we are facing, there will also be a very real crisis of mental health inside the UK's detention facilities.

We have waited over two weeks for a response to our original questions, and we therefore hope that you can respond with some urgency. It is vital that this information is provided so that we can relay appropriate advice to those in detention.

We look forward to receiving a response at your earliest opportunity.

Yours Sincerely,

Ali McGinley, Director, AVID (Association of Visitors to Immigration Detainees)

Bella Sankey, Director, Detention Action

Anna Pincus, Director, Gatwick Detainees Welfare Group

Sarah Teather, Director, Jesuit Refugee Service UK

Teresa Degenhardt, Coordinator, Larne House Visitors Group

Jean Gould, Coordinator, HMP Lewes Foreign National Prisoners Visitors Project (LOSRAS)

Chris Lukey, Coordinator, Manchester Immigration Detainee Support Team

Camille Herreman, Director/Coordinator, Morton Hall Detainee Visitors Group

Kate Alexander, Director, Scottish Detainee Visitors

Michelle, Coordinator, SOAS Detainee Support Group

Maddy Crowther, Co-Executive Director, Sudanese Visitors Group

Nicky Woods, CEO, Yarl's Wood Befrienders

cc. Hindpal Singh Bhui, Her Majesty's Inspectorate of Prisons

Dame Anne Owers, Independent Monitoring Boards

David Bolt, Independent Chief Inspector of Borders and Immigration

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