



# **Annual Report of the Independent Monitoring Board at Dungavel Immigration Removal Centre**

**For reporting year  
1 January 2021 to 31 December 2021**

**Published October 2022**



# Contents

| <b>Introductory sections 1 – 3</b>   | <b>Page</b> |
|--------------------------------------|-------------|
| 1. Statutory role of the IMB         | 3           |
| 2. Description of establishment      | 4-6         |
| 3. Executive summary                 | 7-10        |
| <b>Evidence sections 4 – 7</b>       |             |
| 4. Safety                            | 11          |
| 5. Fair and humane treatment         | 12-13       |
| 6. Health and wellbeing              | 14          |
| 7. Preparation for return or release | 15-16       |
| <b>The work of the IMB</b>           | 17          |

## Introductory sections 1 – 3

### 1. Statutory role of the IMB

The Immigration and Asylum Act 1999 requires every immigration removal centre (IRC) in the UK to be monitored by an independent board appointed by the Secretary of State from members of the community in which the IRC is situated.

Under the Detention Centre Rules, the Board is required to:

- monitor the state of the premises, its administration, the food and the treatment of detained persons
- inform the Secretary of State of any abuse that comes to their knowledge
- report on any aspect of the consideration of the immigration status of any detained person that causes them concern as it affects that person's continued detention
- visit detained persons who are removed from association, in temporary confinement or subject to special control or restraint
- report on any aspect of a detained person's mental or physical health that is likely to be injuriously affected by any condition of detention
- inform promptly the Secretary of State, or any official to whom authority has been delegated, as it judges appropriate, any concern it has
- report annually to the Secretary of State on how well the IRC has met the standards and requirements placed on it and what impact these have on those in its custody.

To enable the Board to carry out these duties effectively, its members have right of access to every detained person and every part of the IRC and all of its records.

The Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that states designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detained persons and to make recommendations for the prevention of ill-treatment. The IMBs are part of the United Kingdom's National Preventive Mechanism.

## **2. Description of the establishment**

2.1. Dungavel House IRC is located in South Lanarkshire, 35 miles south of Glasgow and 10 miles west of the M74, the main arterial link from Scotland to England. It is a former 19th century hunting lodge and was used as an open prison until it became an IRC in 2001 housing both men and women.

2.2. GEO Group UK Ltd (GEO) had been the contractor since 2011. Healthcare was subcontracted by GEO to Med-Co Secure Healthcare Ltd (Med-Co). The GEO contract lasted until September 2021. In that month the contractor changed to Mitie Care and Custody (Mitie). This led to changes in systems and personnel. The Home Office advises that GEO has now exited the UK market. The long-term centre manager has been absent since prior to September 2021 and acting managers have been in place since then. Mitie have continued to subcontract healthcare to Med-Co. There are two resident Home Office Immigration Enforcement (HOIE) teams in place. One is for detention and escorting services (DES), which includes compliance, and the other is a detention engagement team (DET). Prior to Covid disruption in 2020, Scottish Detainee Visitors (SDV) entered twice weekly to see residents by appointment and once a month they operated a drop-in clinic. The position prior to September 2021 is not known but since September 2021 SDV have visited twice a month on average.

2.3. The escorting contract was held by Mitie for the whole of 2021, even when GEO was the main contractor. Mitie have an office and a vehicle base in the car park of the centre. During 2021 this had led to reduced numbers of parking bays for GEO staff and visitors. In order to create additional parking space quotes were obtained and submitted, but the project was paused until the changeover of contractors in September. It is understood that new quotes are currently being obtained.

2.4. During 2021 the vast majority of residents were accommodated in single rooms. Post-reverse cohort unit double occupancy accommodation was introduced during 2021 but this was seldom used. All association rooms were refurbished. Staff offices in each unit are staffed 24 hours a day when the unit is occupied.

2.5. The centre consists of: -

i) The 19<sup>th</sup> century main building which houses offices, a multi-faith centre, shop, residential dormitories, kitchen/dining facilities and the health centre.

ii) Hamilton House. This is a residential building intended to house both male and female residents. Its rooms contain 1 or 2 beds, and all have en-suite toilets. There is an intercom system in each room connected to the control room, and residents have access to kitchen and laundry facilities at all times. In 2021, due to Covid, Hamilton House was used differently from before; it was used for new arrivals (instead of Duke House) due to the reverse cohort process.

iii) A central building encompassing:

- Loudoun House. All rooms have en-suite toilets and a maximum of four beds. Each has a telephone connected to the control room and there is access to prayer room, wudu, kitchen and laundry facilities at all times.
- Duke House. All rooms are en-suite with four beds or fewer and access to prayer room, kitchen and laundry facilities at all times.
- The supported living accommodation unit (SLU) is newly established accommodation. Staff have no specific training in dealing with disabilities, but anyone identified as needing additional support may be placed on a vulnerable adult care plan (VACP), an assessment, care in detention and teamwork (ACDT) plan and/or a personal emergency evacuation plan (PEEP), tailored to the needs of the resident. All staff are trained to manage and deliver these safeguarding systems.
- The reception area and the information and learning centre (ILC).

iv) The care and separation unit (CSU) which can be accessed from reception.

v) A gymnasium, games hall and outside games area.

vi) The centre is secured by a fence and gates. During 2021 completely new systems were introduced by Mitie. This development is unrelated to the issue over the electronics of the inner pedestrian gate raised in the 2020 IMB report. Instead, the systems were to improve key security and mitigate against the risk of keys being taken out of the centre. The systems are manufactured by Traka and are used widely throughout custody sites. The issue highlighted in the 2020 IMB Report related to persistent problems with the mechanisms in the electronically controlled locks in the external gates, usually attributable to cold weather. The gates were decommissioned as they were deemed to be no longer necessary since the erection of additional fencing at the gate house area. Residents now arrive at the centre via the rear gates into a sterile area.

2.6. The capacity of the centre was 125, largely male beds. Until 25 September 2021 the residential units were open from 6.45am to 9.45pm daily, during which time the residents had free association throughout the centre, subject to Covid-related restrictions. From 25 September the hours were amended to 7am until 10pm.

2.7. The facilities within Dungavel include:

- library
- computer rooms / internet café
- arts and crafts room
- sports hall and gymnasium
- chapel / multi-faith centre
- healthcare
- welfare office
- shop
- dining room
- cultural kitchen
- barbers
- outdoor sports facilities
- gardens and poly tunnels
- classroom / education

These facilities operated throughout 2021 subject to restrictions placed on activities during Covid outbreaks. The only facility that was not available throughout 2021 was the sports pitch, due to safety concerns. This is due to be renovated in 2022.

### **3. Executive summary**

#### **3.1 Background to the report**

The Covid-19 pandemic has had an impact on the Board's ability to gather information and discuss the contents of this annual report. More significant, however, has been the change of contractor. Information relating to the period when GEO was contractor has not been available. In addition, the IMB was under complement; its Chair departed on 31 December 2021 and two of the remaining three members have since departed. During the year there was less access by the IMB to the centre, for various reasons. The Board has therefore tried to cover as much ground as it can in these difficult circumstances, but inevitably there is less detail and supporting evidence than usual.

The outbreak of the coronavirus pandemic in 2020 had a significant effect on the operation of the centre, and the centre was in lockdown for part of 2021. However, during 2021 GEO and then Mitie were able to continue managing it well, despite these unprecedented and challenging circumstances.

Dungavel is located in a region which had a very high Covid community infection rate. Some staff were infected through community transmission and there was infection amongst the residents. However, this was managed well.

The activities of the IMB were curtailed by the pandemic insofar as the Coronavirus (Scotland) Act 2020 and related legislation imposed lockdown measures which discouraged movement within Scotland. None of the Board members in 2021 resided within South Lanarkshire, the local authority area in which the centre is located. However, the Board was able to monitor the centre as far as possible in the circumstances and to meet and hold some Board meetings remotely. In addition, members were able to participate in remote training.

Visits to the centre were suspended periodically throughout 2021 during Covid outbreaks.

At the beginning of the lockdown GEO set up a confidential phone line should a resident want to speak to the IMB in private. The Chair phoned the duty delivery operations manager every week for an update and Board received a written update from centre manager every fortnight. GEO informed the Chair within two hours of any notifiable event.

Until 25 September 2021 GEO had the contract to manage the centre and from that date Mitie has had the contract. Ninety staff were subject to Transfer of Undertakings (Protection of Employment) (TUPE) at contract changeover. At the end of 2021 there was a full-time equivalent staff number of 146.

The changeover was managed by an implementation team overseen by the Home Office through reference to a set of deliverables as set out in the contract.

Since September 2021 the resident numbers ranged from a high of 96 in October to a low of 13 in December 2021. The number of 'boat arrivals' had a great effect on

these figures. The percentage who were time-served foreign national offenders (TSFNOs) varied greatly throughout the year.

The top five nationalities were Iranian, Albanian, Iraqi, Eritrean and Syrian. Including the short-term holding facility population (see immediately below) the top five nationalities were Albanian, Romanian, Polish, Pakistani and Lithuanian.

In 2021 there were 470 arrivals and 510 departures. This includes south coast arrivals housed in the Main House on a short-term basis. There was a roll count of 24 in January 2021 and a roll count of 14 in December 2021.

The longest length of stay in 2021 was 462 days (arrived August 2020 and left in November 2021). The shortest length of stay was one day. The average length of stay was 25 days.

### **3.2 Main judgements**

#### **How safe is the IRC?**

The Board is satisfied that in 2021 residents were treated fairly, with respect and dignity, and that they stated that they felt safe and that their human rights were being respected. As always, the residents' main concerns relate to the uncertainty of their futures. This, of course, is not within the control of the Board.

From September 2021 room sharing was allowed for residents who were housed on the same unit, who wished to share and who posed no room sharing risk. Staff offices were staffed 24 hours a day when units were occupied. At least one staff member was allocated to each post. Skype was available for residents to contact both their families and solicitors. Staff tried to encourage use of the service, which was advertised throughout the centre, with resident involvement in improving the service provided. There were resident consultative committee meetings and surveys conducted by the ILC manager.

Admissions to the centre arrived at any time day or night. As in 2020, people might arrive very late at night from Edinburgh Airport only to be taken back there early in the morning for assessment.

#### **How fairly and humanely are detained individuals treated?**

During 2021 detained persons were generally treated humanely in Dungavel. They appeared to have had a good relationship with GEO staff and continued to do so with the staff of Mitie. The safe, open, relaxed regime was welcome. The residential units were open from 6.45am until 9.45pm daily (until 25<sup>th</sup> September, and 7am until 10pm thereafter) during which time the residents had free association throughout the centre, always subject to compliance with Covid restrictions.

#### **How well are detained individuals' health and wellbeing needs met?**

The Board is satisfied that the residents' health and wellbeing needs are being met satisfactorily. From September 2021 a booking system was in place for the use of

Skype, the library, ILC, education activities and the gymnasium. Those residents in isolation had limited access to some facilities.

Each residential unit had a kitchen area and laundry facilities accessible at all times. Residents in units where there was no isolation could access these services directly. On isolation units the facilities were still available at all hours via the officers on the units who would collect the washing and have this laundered separately to prevent the spread of Covid.

The bedrooms did not have locks on the doors but they did have privacy locks. Residents were rarely removed from association. When a resident had an appointment outside the centre, handcuffs were only used after a full risk assessment was made.

### **How well are detained individuals prepared for return or release?**

During 2021 most removals from the centre were transfers south to other establishments. Where possible, residents were given 48 hours' notice. If they were being bailed, they had an interview with the HOIE advising them of their bail conditions and were given all necessary information, travel tickets and paperwork needed. Residents who did not own a phone of their own were allowed to keep the one issued to them on arrival at the centre, and they could keep the SIM card with which they were issued. A welfare officer was always available. An officer was posted to this role and the details of those in the welfare team was displayed around the centre.

## **3.3 Recommendations**

### ***TO THE MINISTER***

Recruitment of members is a serious problem for the IMB. Dungavel IRC is remote, with negligible public transport links. There were three applicants in 2021 and they were interviewed in the summer. Two were recommended by the interviewers. By the end of 2021 neither had reached the stage of being able to visit the centre. We would recommend that the process of recruitment, vetting and training be accelerated in order to facilitate an increased number of Board members.

### ***TO THE DIRECTOR/CENTRE MANAGER***

The temperature within the CSU was too high. This should have been reduced.

As regards equality and diversity, consideration should be given to appointing a disability officer. Disability affects a high proportion of the population.

The training of staff in negotiating techniques needs to be put in place. We note that this has been hampered by Covid restrictions, but these have now relaxed.

The parking area needs to be expanded.

### **3.4 Progress since the last report**

We made four recommendations in our 2020 report:

- ‘Consideration be given to install robust preventative measures to ensure that roofs are not accessible to detainees. This would help towards the safety of detainees and staff.’

We are advised that in consultation with the emergency services it was identified by the contractors that physical barriers would not guarantee that a resident would be unable to access roof space and it was felt that additional measures could have a detrimental impact and could complicate the rescue process. Consideration was also given to the negative impact on residents’ wellbeing of what could be construed as excessive security measures. The contractors advised (and we agree) that a balance needs to be struck between securing the roofs and ensuring that there is not an unduly custodial feel to the centre. There have been no protests at height since 2019. The contractor states that there are robust monitoring processes for residents who are identified as high risk or who fail to comply with the rules of the centre.

Measures have been put in place, such as installing metal barriers to prevent access and bars have been put on windows where access was previously obtained. Anti-climb paint has been applied.

- ‘Some staff be trained in negotiating techniques.’

This has not yet been addressed but we are told that Bronze Commander training has been scheduled and the participants will be invited to attend negotiating technique training.

- ‘The escorting contract is held by Mitie who have an office and a vehicle base in the car park of the centre. This by default, has led to a much reduced number of parking bays for GEO staff and visitors. This must be addressed.’

We are advised that the old training base, situated on the centre grounds, is being extensively refurbished and will house the vehicle base and escorting vehicles and that this will free up considerable parking in the car park.

- ‘The centre is secured by a fence and gates. During 2020 there was an issue with the electronics of the inner pedestrian gate. The Board strongly recommends that this gate be upgraded.’

We are satisfied that the new security measures implemented by Mitie (see 3.5 vii) above) appear to have resolved this issue. The inner pedestrian gate now has biometrics as an additional security measure. It also has an override function that allows the manual opening of the gates in the event of any failure.

## **Evidence sections 4 – 7**

### **4. Safety**

#### **4.1 Reception and induction**

Each resident was seen by a nurse within two hours of arrival and was assessed by health staff.

#### **4.2 Suicide and self-harm, deaths in custody**

In 2021 there were three instances of self-harming. No resident required hospital treatment. There were three instances of food and fluid refusal, as compared to nine in 2020. All procedures followed were in line with World Health Organisation guidelines throughout 2021. All residents resumed eating. Any person found to be self-harming was put on a vulnerable adult care plan (VACP) or an ACDT.

#### **4.3 Violence and violence reduction**

From September to December 2021 there was one resident on resident assault. In the same period there were three resident on staff assaults, involving two residents. Charges were brought against the two residents and the outcome of this is awaited.

#### **4.4 Detained individuals with specific vulnerabilities, safeguarding**

Reverse cohorting occurred throughout 2021. On arrival, all residents were placed on a VACP as a precaution to ensure that they received additional support due to isolation and possible vulnerability. Those residents who were thought to need further support were encouraged to speak to healthcare and might be placed on an VACP or an ACDT or PEEP (personal emergency evacuation plan). Thereafter, there was always a welfare officer in reception, and residents could request an appointment by speaking to an officer whereupon an appointment would be arranged. The safety of the female population is taken seriously. Their residential unit is always secured but they have free association. They can request an escort to gain access to their social rights, e.g. multi-faith room. Safety surveys are carried out monthly to ensure they do not feel threatened.

#### **4.5 Use of force**

Incidents where force was used were recorded and reports were made to the monthly meetings between the IMB, the contractor and the Home Office.

#### **4.6 Substance misuse**

A Rapsican narcotics detector was in use throughout 2021. No drug dogs have been on site since September 2021 but there is provision for such dogs to return on an ad hoc basis and then routinely as required.

## **5. Fair and humane treatment**

### **5.1 Escort, transfer and transport**

The IMB is satisfied that all these activities are conducted fairly and humanely.

### **5.2 Accommodation, clothing, food**

As regards food, the kitchen provides three meals a day. Lunch and dinner consist of three courses. Menus are on a four-weekly cycle and the quality and quantity of food is excellent. All religious and medical dietary needs are catered for and staff try, where possible, to cater for the preferences of different nationalities. The menus have been expanded since September to offer more options to residents.

A food safety management system is in place to ensure all appropriate standards are adhered to. Paperwork is collated noting stock in / out dates and food temperatures both hot and cold at the servery. A Lanarkshire environmental health food officer visits annually and the catering department is audited quarterly by an auditor from the National Offender Management Service appointed by the Home Office. All staff certification is up to date and displayed.

During 2021 catering for isolating residents was delivered to the residential units. Staff provided weekly menus to those residents and they would return these to the unit officer with food choices daily. Food was packaged in bags and containers and placed inside the door, with the resident being asked to move to the back of the room and wear a mask when the food was delivered.

Social distancing and mask wearing were encouraged amongst residents and were mandatory for staff since September 2021. This included at times when meals were delivered.

The shop / internet cafe sold a range of products to meet the diverse needs of residents. The shop stocked a good range of basic clothing, shoes, toiletries and food products which were sold at extremely low prices. Profits were re-invested into the centre and the residents were consulted on this.

Fire alarms and smoke detectors were tested weekly. Fire evacuation procedures were tested, although due to Covid this was done without the residents' participation.

#### **5.3.1 Separation**

The centre's CSU was used in relation to removal from association (rule 40) and a completely separate ground, temporary confinement (rule 42)

Rule 40 was used on 11 occasions from September to December 2021. Of these:

- Eight were for non-compliance and disruptive behaviour.
- Three were for damage to property.

### **5.4 Staff relationships with those in detention**

The impression of the IMB is that there was a good relationship between residents and GEO and then with Mitie. In comparison with other IRCs in the UK Dungavel had a small number of residents and this seems to have lent itself to a relaxed and quiet atmosphere with a high ratio of staff to residents.

## **5.5 Equality and diversity**

All protected characteristics were observed in the centre in 2021. There were two appointed LGBTQ+ officers, one of whom was male and the other was female. A confidential helpline was available. There were posters throughout the centre promoting respect for LGBTQ+ residents. Disability was not afforded the same priority.

## **5.6 Faith and religious affairs**

In 2021 the centre was well provided with facilities for religious observance. These were well maintained. Where possible, all religious needs were catered for, and the women's residential area and Loudoun House have prayer rooms which can be accessed day and night. Signage indicating the direction of qibla was present in all prayer rooms and in the CSU.

Since the Covid restrictions were introduced various faith leaders would come to the centre if requested and visits were facilitated via an on-demand service. Residents could book religious visits via the religious affairs manager (RAM). The RAM was responsible for ensuring that residents and visitors had PPE (masks and gloves) and were waiting in the multi-faith area prior to visit. The RAM escorted the religious visitor to the multi-faith area and supervised the session to ensure that social distancing was maintained, and that PPE was in place throughout.

## **5.7 Complaints**

5.4. Complaint forms in several languages were openly available. All HOIE complaint boxes were checked every 24 hours and passed to the appropriate agency to be dealt with. There were 20 complaints made about Mitie from 25 September to 31 December 2021.

There were nine complaints against healthcare staff. These were largely submitted by two residents.

No complaints were upheld.

## **5.8 Property**

There were lockable wardrobes in each room and those in Hamilton House had safes fitted. Residents were encouraged to keep their rooms clean and tidy and would receive £2 per day in return.

## **6. Health and wellbeing**

### **6.1 Physical healthcare**

Healthcare provision was good, and a GP attended the centre daily. An NHS psychiatrist dealt with mental health issues. Residents had access to dental and optical care and several specialist clinics were regularly held. External practitioners operated as per Covid guidelines when visiting to undertake clinics.

Rule 35 cases were dealt with by doctors trained to undertake this assessment. There were 32 rule 35 reports completed and submitted in 2021.

During 2021 a nursing team of eight qualified staff provided 24-hour care

There were residents with Covid symptoms and those with positive Covid results. These were managed safely and appropriately following daily contact with Public Health Lanarkshire during these episodes.

### **6.2 Mental healthcare**

During 2021 an NHS psychiatrist dealt with mental health issues. A consultant from Wishaw Hospital provided psychiatric input. None were sectioned under the Mental Health Act in 2021 (two residents were sectioned in 2020).

**6.3 Exercise, time out of room** centre is very well provided with a range of activities, facilities and communal areas whereby residents need not spend more than minimal time in their sleeping accommodation. Given the low numbers of residents during 2021 there seems to have been ready access to these services. Also, the ILC organised activities and competitions.

The

### **6.4 Soft skills**

During 2021 a barber would attend the centre provided Covid guidelines permitted. In the absence of a barber the resident would be provided with hair clippers and would be monitored. Once used the clippers and accessories would be bagged and deep cleaned prior to being re-issued

## **7. Preparation for return or release**

### **7.1 Activities including education and training**

The ILC was open each day in 2021 from 9am to 12pm, 1pm to 5pm and 6pm to 9pm.

The department manager was qualified in educational management and was a qualified teacher. She was assisted by one full-time tutor and two part-time tutors. Residents spent considerable time in the ILC and staff have built up a good relationship with them which helps promote harmony.

Residents in regular association could book a 45-minute slot to attend the gym and/or the ILC daily. This was done by the resident completing and signing a booking sheet which was brought by either the resident or the unit officer to the library. Unit detention custody officers can also book an appointment by telephone.

In 2021 the library stocked books in 41 different languages and there were many multilingual posters and signs throughout the centre. There were also multilingual books available on 17 Kindles which residents could borrow. English for speakers of other languages (ESOL) classes were offered. All residents were required to complete a food hygiene course at induction which was carried out in the department on a daily basis. During the pandemic only two residents were permitted in the library at any one time. Social distancing was required at all times and a failure to do so would result in exclusion.

There was a large sports hall and a gymnasium, both of which were extremely popular and were supervised by trained staff. All gym equipment was checked by a service engineer. During 2021 when the centre was in lockdown, access to the gym was stopped until the centre came out of lockdown.

Residents placed in isolation did not have access to the main gymnasium. Fitness DVDs were obtainable through the library and exercise plans were included within distraction packs. A treadmill and free weights were available within the isolation unit in Hamilton House. These items could only be used within the designated room and on completion of the equipment induction. This was facilitated by the gym officer. Only one resident was permitted to use the room at any one time to ensure social distancing. Areas required thorough cleaning and chlorination after use. Sufficient time had to be left between bookings to allow for suitable cleaning and air dispersal. Staff cleaning the area were required to wear masks, gloves and aprons.

Women in isolation could make requests to access the gym and ILC facilities. On request, dedicated isolation sessions could be booked to accommodate regime opportunities for women. The duty manager had to approve all isolation sessions and give specific guidance.

There is also an outdoor multi-use sports facility which was used for a variety of sports including football and cricket. This was well used in the summer months.

Residents had access to Xboxes, Xbox games, DVDs and CDs, and there was satellite TV in rooms. There were also board games and a pool table in association rooms, and residents would be allocated time in fresh air even if Covid-positive or in isolation.

During 2021 internet access was not available to isolating residents. If any communications or correspondence required emailing or faxing to outside agencies, Mitie would assist in ensuring that this was promptly achieved for the resident.

## **7.2 Case management**

In 2021 residents were provided with a list of authorised legal aid firms and were encouraged to name their own choice. Unlike the English centres Dungavel does not have a duty solicitor scheme; instead, residents select their own solicitor from a list of recommended immigration solicitors based in the Glasgow area.

## **7.3 Family contact**

Dungavel IRC is in a remote location. During 2021 a free bus service for visitors from the local bus and train stations in Hamilton 15 miles away was provided by the centre if the visitor made a request for this service the day before the visit. Visits were disrupted due to Covid. Mitie expanded the service so that as long as notice was given a taxi would be ordered to and from the railway station or other relevant location.

## **7.4 Planning for return or release**

The majority of removals from the centre were to other establishments in the UK. Residents were given 48 hours' notice where possible. A welfare officer was always available during return or release. If bailed, residents had an interview with the HOIE to inform them of their bail conditions. Residents without a phone of their own could keep the one issued to them when they arrived at the centre, and they could keep their SIM card.

## 8. The work of the IMB

The IMB comprised only four members. They were stretched. One was on a sabbatical for the entire year and was unable to visit. This left three individuals on the rota. Until July 2021 one of them was unable to drive, hampering his ability to visit. Both the other members lived well away from the centre. One had health issues towards the end of the year. The Chair stepped down on 31 December. Visits to the centre were suspended periodically throughout 2021 during Covid outbreaks.

During the pandemic, the IMB application boxes were checked daily by HOIE and posters were put up advising residents how to contact the IMB. They were also told they could ask a member of staff to contact the IMB.

### Board statistics

|                                                              |                       |
|--------------------------------------------------------------|-----------------------|
| Recommended complement of Board members                      | 8                     |
| Number of Board members at the start of the reporting period | 4 inc 1 on sabbatical |
| Number of Board members at the end of the reporting period   | 4 inc 1 on sabbatical |
| Total number of visits to the establishment                  | 45                    |



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