

97. The IMB endorses the recommendations made by Professor Bosworth as enumerated at the conclusion of her oral evidence.<sup>193</sup>

98. In addition, the IMB has previously identified three matters which should form the subject of recommendations arising from this Inquiry:

- a. First: it is imperative that the safeguards against the inappropriate use of detention which appear to have broken down at Brook House – the use of rules 34 and 35 and the Adults at Risk policy – must be strengthened with particular focus on the impact of detention on the mental health of all detained persons and especially those who are, or should be, identified as vulnerable adults at risk. IMBs have raised concerns or recommended changes in these areas in annual reports for a number of years. The IMB will, in any event, continue to focus carefully on how these operate in practice.
- b. Second: to ensure that detained people have access to meaningful support in dealing with those in the Home Office who are making decisions affecting their lives. Caseworkers should be on site and meeting with detained persons on at least a periodic basis. There should be meaningful access to legal advice, including significant improvements to mobile telephone reception, IT facilities and access to interpreters for legal appointments.
- c. Third: the IMB reiterates a recommendation made by it for many years: that, because of the profound impact which detention has on individuals, a time limit for immigration detention should be introduced.

99. The IMB would add that this Inquiry has confirmed the view held by the National Chair and Management Board that it is important that the IMB's national governance structures be placed on a statutory footing.<sup>194</sup>

29<sup>th</sup> April 2022

JONATHAN DIXEY  
JENNIFER WRIGHT

5 Essex Court

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<sup>193</sup> Professor Bosworth [29 March 2022 161/6 – 163/4](#).

<sup>194</sup> See Dame Anne Owers' first statement: [IMB000199\\_0006](#), §17 and second statement: [IMB000221\\_0009-0010](#). Within Dame Anne Owers' second statement she has addressed (at §§34-37: [IMB000221\\_0010](#)) the issue of whether there should be separate monitoring bodies for prisons and immigration removal centres. On this issue, see also Professor Bosworth [29 March 2022 163/12 – 164/25](#).