Detainees under escort: Inspection of escort and removals to

Jamaica

by HM Chief Inspector of Prisons

7-8 March 2017

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Fact page

Departure airport Stansted

Destination country Jamaica

Destination airport Kingston

Escort contractor Tascor

Number of detainees escorted 32

Number of escort staff 103

Health care staff Five (three on flight)

Length of journey 22 hours 35 minutes (maximum)

Introduction

Removal flights to Jamaica restarted recently. Many of the improvements we observed in removal operations were evident in this operation. The process of collecting detainees from the immigration removal centres (IRCs) was reasonably well organised, and IRC staff generally played their part in preparing detainees for removal, especially at Brook House, although arrangements at Yarl's Wood were less appropriate. Escorting staff promptly established an understanding with most detainees through a friendly and polite approach and informal conversation. They went out of their way on occasion, for example, to arrange for a detainee's luggage to be brought to the airport.

However, an expectation of higher risks had built up around this removal route. This was explained by the fact that four men had protested against their removal at their IRC and one detainee had violently resisted removal on the preceding Jamaica flight. However, these incidents influenced staff behaviour to a disproportionate extent. From the initial operational briefing onwards, staff were reminded of the risk of disruptive behaviour generally, rather than in respect of particular individuals. As a result, seven people were put in waist restraint belts, not because of violence or a need for physical restraint, but because of their 'demeanour' or 'attitude', in the words of staff. In the case of two men who were concealing fragments of a razor blade in their mouths, this was a proportionate response. In the case of a 57-year-old woman who was first forced into compliance by use of a rigid handcuff applied purely to inflict pain, then fitted with a waist restraint belt, the proportionality of the treatment was much less clear. These and other examples in this report illustrate that there was a need to establish and embed a calm, consistent and proportionate approach to risk management through staff training and active supervision of the process.

For a detainee (and staff with him) to spend nearly eight and a half hours on a coach before transfer to the aircraft was as demanding as it was inexplicable. Many others spent not much less time travelling. The process required streamlining; staff could rest on the return journey, but detainees went straight into a new chapter of their lives. Small deprivations were added to the experience when detainees spent the 11-hour flight without receiving hot drinks and with only a small plastic spoon with which to eat meals.

Some written information was available to detainees about sources of assistance that would be available when they arrived in Jamaica; and staff, including immigration officials, were as reassuring as possible. However, while the receiving officials were welcoming and some who disembarked at Kingston seemed confident about their future, a number were anxious and some said they knew no one there.

The flaws in this operation were not all attributable to specific risk factors such as concealment of sharp blades. Although it passed off reasonably calmly overall, talking up risks undermined to some degree even experienced staff's confidence in their interpersonal and other skills. It should be possible to achieve a more measured and consistent approach in future.

Peter Clarke CVO OBE QPM HM Chief Inspector of Prisons April 2017

Section 1. Summary

- 1.1 Staff received a briefing containing much information about risks, but no details about how to identify or meet detainees' individual needs. Many officers were experienced and carried out their duty of care well, but several inexperienced staff lacked confidence when it came to undertaking their duties.
- 1.2 Three men were removed from the flight because they had climbed onto the anti-jump netting on a landing at Brook House. Reserves (detainees who are taken to the airport to fill a vacant space in case another detainee's removal is blocked at a late stage in the process) had been identified and a number boarded the flight. The flight carried 32 detainees. Six were women.
- 1.3 Most detainees were brought directly from their residential units to the reception for departure, except at Colnbrook where they had been in the induction unit before they left. In one case immigration removal centre (IRC) staff patiently and skilfully persuaded a detainee refusing to move to go to the reception. At Yarl's Wood, however, six detainees were held in the care and separation unit from 4pm, without being given the opportunity to pack their property; the coach left at 3.25am.
- 1.4 Waist restraint belts were used on several people by Tascor staff. Staff told us this was because of their 'demeanour' or 'attitude' and not because of any risk of imminent physical resistance. None of those in restraint belts had been physically violent on the day of the departure, although one of them had fragments of a razor blade in his mouth and his behaviour was erratic enough to justify use of the restraint belt. In another case, a rigid handcuff was used to apply pain to a passively non compliant woman's wrists to induce her to board the aircraft. A waist restraint belt was then applied and remained fastened for two and a half hours.
- **1.5** Health care arrangements worked reasonably well, but the lack of a personal handover of information from IRC health care staff to the escorting health workers put continuity of care at risk in some cases.
- **1.6** Both IRC and Tascor staff generally established a good rapport with detainees. They advised detainees to note down from their phones any numbers they might need to ring, and offered them the use of Tascor mobile phones.
- 1.7 Staff focused unduly on risk. Some Tascor staff crowded around detainees so they were hemmed in confined areas. Custody officers crowded around detainees at times, which was at times unnecessary and intimidating.
- 1.8 The longest journey time was 20 hours and 35 minutes. Most were on a coach for many hours. The coaches were all suitable and detainees' physical needs were met. Food and hot drinks and water were available on the coaches. Meals on the aircraft were adequate, but no hot drinks were served, which was unduly risk averse. Detainees were safe on the aircraft as adequate supervision was maintained and at least one officer monitored each detainee at all times, even though many staff slept for periods of time.
- 1.9 Tascor staff went out of their way to help a woman who had very little property with her, enabling her husband to bring suitcases to the airport. Staff did not allow toilet doors to be fully closed, and a detainee's objection to this demeaning practice led to the only momentary fracas of the operation. Each detainee received a Speak Freely Tascor form providing a phone number for complaints, and complaint forms were available in IRC reception areas, but most detainees were not told how to make a complaint.

1.10 Copies of the Coming Home to Jamaica booklet produced by the British High Commission and other agencies were handed out to all detainees. It contained limited information on sources of practical support. The chief immigration officer on board was helpful and considerate when he answered detainees' questions. Many detainees did not know what would happen to them on arrival and those who had very few or no prior links with anyone in Jamaica did not know what resources would be available for them. As the plane came in to land, many detainees became noticeably anxious about what treatment they might receive after their arrival. The handover to Jamaican immigration staff was calm and well organised.

Section 2. Background

- 2.1 All inspections carried out by HM Inspectorate of Prisons contribute to the UK's response to its international obligations under the Optional Protocol to the UN Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT). OPCAT requires that all places of detention are visited regularly by independent bodies known as the National Preventive Mechanism (NPM) which monitors the treatment of and conditions for detainees. Escorts are included in this remit. HM Inspectorate of Prisons is one of several bodies making up the NPM in the UK.
- 2.2 The aircraft was chartered by the Home Office directorate of immigration enforcement, and Tascor was the escort contractor. The operation was inspected from the point at which detainees were collected from the IRC, and an inspector monitored one of two initial staff briefings at Spectrum House, Gatwick. Two coaches from Brook House IRC carried nine and four detainees respectively. The longest journey time was from Brook House. The first detainee boarded a coach at Brook House at 9pm, but was then withdrawn from the flight. A second boarded at 9.25pm and the last at 12.10am. The coach left the IRC at 12.20am and arrived at Stansted at 2.30am. The coach did not take detainees to the flight until 5.50am. Two inspectors travelled on the flight, which took off from Stansted at 7.20am and arrived at Norman Manley International Airport, Kingston, at 6pm (all times GMT). Records of a previous flight to Jamaica were also examined for this report.

Section 3. Safety

Expected outcomes:

Detainees are escorted in safety and due regard is given to individual needs and risks. Removals are conducted in accordance with law. Security and good order are maintained through proportional operational arrangements and force is only used as a last resort.

Preparation and departure from removal centres

- 3.1 The operation began with staff briefings at Spectrum House, Gatwick, one of which we attended. Not everyone could hear or was listening to the briefing. Staff had spilled out into the corridor and some people were having conversations outside. Staff received appropriate advice on record keeping and were reminded that if they were falling asleep or needed a break, they had to make sure an officer was awake and monitoring the detainee. Staff were told the detainees on the charter presented higher risks than those on other charters and 'virtually all are violent criminals who have assaulted staff'. They were advised to 'use close escorting ... the officer behind the detainee should have his hands on the back of him.' There was a strong emphasis on the risk of disruptive behaviour. On the flight, a member of staff justified his wary approach, saying that although he had no specific knowledge of the individuals, 'people were going back to be killed' and were desperate enough to do anything. Although a number of staff on the operation had little or no experience of charter removals, the briefing contained no guidance on welfare issues, such as the stresses the detainees might be under and why, the importance of treating people decently and giving detainees the opportunity to make telephone calls. We spoke to one officer on his first charter flight who did not know his colleagues or what his duties were in any detail.
- **3.2** The Home Office immigration enforcement (HOIE) directorate and Tascor managers communicated regularly by phone about changes to the list of passengers. This included three detainees at Brook House who had climbed over the railings on an upper landing walkway on to the safety netting at 9.10pm. They were removed from the flight list because of the delays involved. Their removal from the list at this late stage meant a coach assigned to Brook House was diverted to Yarl's Wood to collect several women who had been on the reserve list. On 7 March about 50 people were designated for removal, but 18 were removed from the list and 32 flew.
- **3.3** All detainees had been at the departure IRC for more than one night, several of them about 48 hours before the removal, so all of them had been able to rest for a reasonable period before the long operation. Preparations had been made at the IRCs. For example, at Brook House, where 27 detainees had originally been identified for the flight, a series of planning meetings had been held in the preceding days, and additional staff had been on duty on the day before the removal. Two detainees had been placed into the care and separation unit; one was passive but claimed to have weapons (none were found when he was stripsearched). He was calm and polite at the time of the removal. The other had been climbing on the netting the previous day (see paragraph 3.2); the incident was resolved with external assistance from HM Prison and Probation Service.
- 3.4 At the IRCs, a team of staff went to each individual room to collect detainees. In all cases, they were polite and gave detainees time to pack any additional items. At Harmondsworth, an IRC officer spent 15 minutes speaking politely and patiently to a reluctant detainee, finally persuading him to walk to the reception area. At Colnbrook, all detainees said they had been able to make phone calls.

3.5 At Brook House detainees arrived in reception and were greeted by the 'coach commander', the officer in charge of each coach. Most were using their phones as they arrived and could continue until they were about to board the coach; the coach commander explained that a phone would be made available on the coach and allowed them to transcribe numbers from the mobile they had been using. He explained what was happening, asked if there were any problems and if they understood where they were going. He politely explained to those who brought up legal issues, that it was beyond his control, but assured them due process would continue until the plane was ready to leave.

Security, order and personal safety

- **3.6** Rub-down searches were carried out in a separate room in each case, and searching staff were courteous. At Harmondsworth, four officers were present crowded into the small room when a detainee was searched, which was not justified by any specific risk (see recommendation 4.14). Detainees identified concerns about missing property or cash, which were promptly resolved.
- **3.7** At Yarl's Wood, six women had originally been identified for removal. They were taken to the care and separation unit at 4pm and held there, but not locked in cells. Staff said this was done to make the process smoother rather than on grounds of an individual risk assessment. The women said they were confused and did not know why they had been taken to the unit. One woman said she had been taken to the unit as she left the chapel; it was the first she knew about the removal. As a result, she had not packed her belongings, which were in her room but was able to do this later. The officer in the unit was very helpful and supportive towards the women. The coach left at 3.25am on 8 March, but only two of the original six women were removed; the remainder were kept in the unit until the coach had left. Further spaces became available on the flight and the Home Office notified the IRC and Tascor of the names of detainees on the reserve list at 4pm on 7 March. These four additional women were held in reception from about midnight, pending the arrival of the escort transport. None of them had volunteered to be a reserve for the flight.
- **3.8** At Yarl's Wood, Tascor staff dealt well with anxious and distressed women, interacting positively with them throughout, and de-escalating a situation where the detainee said she would not go. No restraints or hands-on control were applied.
- **3.9** In general, officers did not lay hands on detainees unnecessarily. At Harmondsworth, however, they took detainees by the arm to lead them to the coach, which was not necessary since detainees were complying with instructions. While boarding the aircraft the officer held each detainee, guiding them by the arm; since the area was insecure and it was the same officer who had been accompanying them up to this point, it was not inappropriate.
- **3.10** Seven detainees were placed in waist restraint belts by Tascor staff during the operation. Some of them did not comply with instructions but none was using violence to physically resist staff during the operation. At Brook House, a detainee had been brought to the reception in handcuffs after restraint in the separation unit and was placed in a waist restraint belt, although he was complying with instructions. He was then taken to have his property checked where he was compliant and talkative. The belt remained on and he was put onto a secure van. This use of the belt could perhaps be justified on the basis of recent resistance, although he had become compliant.
- **3.11** A 23-year-old detainee at Colnbrook was housed in the care and separation unit from 7pm because he had said he would not leave. IRC staff persuaded him to walk out of the centre voluntarily. He was upset because he felt he had been badly let down by his solicitor. He said he had come to the UK from Jamaica when he was aged one, and had no memory of Jamaica;

that his mother was in the UK and he had a baby. The IRC staff did not brief escort staff about him as they handed him into their care. In reception, staff decided to use a restraint belt on him. He asked why and he was told it was because of his 'demeanour' and for his protection and theirs. Staff said he had been shouting. He did not try to resist before or during the application of the belt.

- **3.12** At Harmondsworth one detainee in the searching area was placed in a waist restraint belt, because staff said he had 'a bit of an attitude.'
- **3.13** At Brook House, two detainees had fragments of a razor blade in their mouths. In one case, in reception two Tascor staff asked him what was in his mouth. One of the staff swore loudly, exclaiming he had blades in his mouth, while another grabbed his arm and several staff told him to spit the blades out, which he ignored. When the coach commander arrived, he restored calm. Staff instructed the detainee to kneel and they appropriately applied the waist restraint belt. Tascor staff were only then handed an assessment, care in detention and teamwork (ACDT)¹ document, of which none of them had previously been aware. The ACDT gave no indication of an immediate threat. The detainee was taken to Stansted Airport in a secure van. On the aircraft, he handed over the blade fragments and the waist restraint belt was loosened to the 'restricted' position. Tascor staff's lack of awareness of the ACDT and staff's immediate reactions contributed to an increasingly risky situation, although it ended calmly.
- **3.14** At Brook House, welfare staff and an ACDT assessor, having spoken to each of the detainees during the day, came back on duty when the detainees would have been taken to reception for departure. They had a good rapport and knowledge of those who were leaving.
- **3.15** A 57-year-old woman brought from Yarl's Wood said she would not leave the coach when it drew up beside the aircraft. Staff persuaded her to go to the front of the coach but she then refused to move any further. A female escort officer recorded: 'She kept repeating she did not want to go and refused to move, at which point I applied a handcuff for pain compliance on her left wrist, and told her I would apply pain to her wrist if she did not walk with me off the coach.' She was carried down the coach steps, and pain compliance was used to make her kneel so the waist restraint belt could be fitted. She had both wrists tight to her waist in the belt, and a rigid handcuff on her left wrist. She walked up the aircraft steps and was seated, while crying out 'I'm hurt. Why did he have to put me in this?' The handcuff was removed half an hour after it had been applied. The waist restraint belt remained on for two and a half hours. The health care worker examined her and recorded slight reddening and abrasion to the skin around the wrist. Use of the rigid handcuff solely to inflict pain before other measures had been taken to ensure the woman boarded the aircraft was at least questionable (no inspector witnessed this incident until she was on the aircraft).
- **3.16** Records of a previous flight to Jamaica in September 2016 were also examined. On that occasion force was used on two men. One refused to open his mouth when being searched in reception; he admitted that he had a blade in his mouth. A rigid handcuff was used to inflict pain to make him kneel, and the waist restraint belt was then applied. Staff decided that the removal would not proceed. In the other case, the detainee violently resisted staff at various stages of the operation. In this case, the waist restraint belt was applied on the coach when he refused to board the aircraft, as were leg restraints; he was carried up the aircraft steps. A rigid handcuff was applied for pain compliance only in the aircraft, when he continued to resist violently. The case appeared to exemplify a suitably graduated use of force in response to a violent detainee, in contrast to the way in which force was used in some cases during this removal, notably the case of the 57-year-old woman.

¹ ACDT is a process for monitoring and supporting those identified as at risk of self-harm or suicide.

Recommendations

- 3.17 All escorting staff should be effectively briefed about their duties. Briefings should include accurate and balanced information on risk and welfare issues.
- 3.18 Physical force, waist restraint belts and handcuffs should be used in a planned and sequenced way, ensuring that each use is limited to situations where it is required to prevent harm or to enforce compliance when all other means, short of physical force, have failed. It should also be proportionate.
- **3.19** Custody officers should understand how to respond to the unexpected in a calm and measured way.
- **3.20** Escort staff should be informed of any detainees on self-harm monitoring case management immediately on their arrival at the IRC.

Section 4. Respect

Expected outcomes:

Detainees are escorted in decent physical conditions and individual needs are addressed. Detainees are treated with humanity and respect.

Physical conditions and property

- **4.1** Many detainees spent a long time on a coach before moving straight into the aircraft for the II-hour flight. A detainee boarded the coach at Brook House at 9.25pm, was transferred from the coach directly to the aircraft at about 5.50am, and arrived in Jamaica at 6pm GMT. The length of the journey was exhausting for detainees and staff alike. The total journey time for the first detainee who boarded a coach was 20 hours and 35 minutes. Almost as soon as the journey began detainees were provided with food: a choice of sandwiches with crisps, fruit, cakes or chocolate bars and water. All detainees were served before staff were offered food. Hot drinks were offered to detainees on two coaches, but not on the aircraft. On the aircraft, detainees and staff only received plastic spoons with their meals. Although many staff slept during part of the flight, each detainee was always supervised.
- **4.2** Although there were long waits on the coaches at Stansted, the new system of transit directly from coach to aircraft was a significant improvement and no longer required detainees to undergo the unnecessary and often demeaning process of being marched through airport security.
- **4.3** When a man used the toilet on the coach or aircraft, an officer kept the door very slightly ajar. This practice was not on the basis of individual risk assessment, demeaning and in most cases an unnecessary intrusion on privacy. In this case it led to the only brief physical altercation of the operation, when a detainee accused a security team officer of looking at him; he struck the door to close it and the officer opened it and raised his arm to ward off any aggressive movements. The moment was quickly over.
- **4.4** Detainees could change into clothing of their choice before their luggage was sealed for the flight. At Harmondsworth, some detainees could have a cigarette in a secure exercise area before departure.
- **4.5** Staff dealt well with one woman who had brought very little property to the centre. They allowed her to call her partner so he could take suitcases to the airport. She could call again when she was on the coach and the suitcases duly arrived at Stansted airport.

Respectful treatment

4.6 Staff were generally courteous to detainees. As soon as the detainee boarded the coach, an officer introduced themselves and sat next to him; the same officer remained responsible for that detainee's care until the end of the flight. At all IRCs, Tascor staff advised detainees to note down from their phones any numbers they might need to ring, and offered them the use of Tascor mobile phones, which detainees could use on the coach, in some cases for long periods. On the Colnbrook coach, two young men who were not at ease – one suffered panic attacks and the other had overstayed his visa and had no criminal conviction – were in the care of officers who were friendly and chatted to them.

- **4.7** However, on the Harmondsworth coach, the escorting officer told a detainee who was unhappy that if he refused to get on the flight or caused a nuisance, the Home Office would 'rip up any appeal documentation and not let him back.' This man was concerned as he said he had lodged an appeal. The officer's words were intimidating and untrue.
- **4.8** Staff emphasised unduly the high risk posed by detainees, which led to occasions when officers crowded around detainees unnecessarily. At Yarl's Wood, Tascor staff were crowded around the desk as women walked out of the waiting room; they stood close together in the narrow corridor leading to the care and separation unit, which was intimidating. Staff also crowded around the detainee during the chief immigration officer's surgery on the aircraft.
- **4.9** Although escort staff generally explained how the operation would go, not all detainees were kept informed about what was going to happen: for example, many were not told they would be filmed while boarding the aircraft or the reasons why, which meant some reacted negatively when it happened.
- **4.10** One detainee was on self-harm monitoring and walked with a crutch. He said the police in Jamaica had caused his disability when they tortured him. He was one of those who had concealed fragments of razor blade in the mouth. Staff treated him with reasonable consideration for his disability.
- **4.11** Speak Freely information sheets on making a complaint about Tascor staff were handed out to all detainees, and complaint forms were available in IRC reception areas. There was no provision for making complaints about the Home Office immigration enforcement directorate.
- **4.12** Handovers from health care staff in the IRCs was mixed. The Tascor medical officer had to ask the nurse if they could discuss issues she had seen in medical notes, which came in a sealed envelope, on at least three occasions. IRC nursing staff responded promptly but did not offer information of their own accord nor did they remain in reception for long. At Harmondsworth, no verbal handover from IRC to Tascor health care staff took place. At Colnbrook, the paramedic was aware of a detainee who was a diabetic and reassured him, explaining that he would have access to a diabetic pack throughout the flight. Another Colnbrook detainee was afraid of flying and had previously suffered panic attacks. We were told that he should have been taking medication over the previous three days but that he had not received any. A nurse brought the medication to the paramedic. Two men did not have their medication; the health care worker said this happened regularly when people were transferred from the IRC. On the aircraft, a man who had dislocated his shoulder the previous day was given medication, and cabin crew helped health care staff provide an improvised ice-pack for him.

Recommendations

- 4.13 Detainees should be held on a coach for the shortest time possible.
- 4.14 Staff should not crowd around detainees in such a way as to intimidate them, except where close guarding is justified by credible information on specific risks.
- 4.15 Staff should, at every stage, explain to detainees what is going to happen in sufficient detail to allay fears and enable them to prepare.

Good practice

4.16 Tascor staff made strenuous efforts to enable a detainee's luggage to be brought to her at the airport before departure.

Section 5. Preparation for reintegration

Expected outcomes:

Detainees are prepared for their arrival and early days in the destination country. Any unacceptable behaviour in destination countries is appropriately challenged.

- **5.1** Welfare staff at the IRCs had a series of information packs and a leaflet from an agency, which could assist detainees on arrival in Jamaica with accommodation and other concerns. They had been issued in the units and were also offered in reception. The Coming Home to Jamaica booklet, prepared by the British High Commission and other agencies, was offered to each detainee at various points, including on the aircraft. It contained information about Jamaica, although guidance on sources of practical support was limited.
- **5.2** Many detainees complained that the zip bags in which their belongings were placed easily identified them as returnees and made them vulnerable.
- **5.3** The chief immigration officer (CIO) held a surgery on the aircraft. He listened carefully and gave detainees advice about what possible steps might be open to them, without expressing a judgement. When one man came to speak to him, staff stood around him at an intimidatingly close distance. He became visibly angry and would not speak to the CIO under these circumstances. Later the staff member looking after him returned with the question he had wanted to ask and, together with the CIO, did what was possible to remedy a problem which need not have arisen in the first place.
- **5.4** Five detainees said they did not have anyone to meet them at the airport and did not know how they would get to family on the island. One woman and one man said they had no one to go to and no idea what they would do, although others had family meeting them. Several detainees had lived in the UK for a long time, leaving family behind, including children.
- **5.5** A young man, aged 20, who had 36p on him, was given a destitute payment of \$30 to get him across the island.
- **5.6** On landing, several detainees were anxious after seeing the Jamaican police draw up with police coaches to collect them. Many said they were worried for their safety. The Jamaican immigration staff who came to identify the detainees on the aircraft were courteous and professional and welcomed the detainees.

Recommendation

5.7 Luggage should not make detainees easily recognisable as returnees on arrival.

Section 6. Summary of recommendations and good practice

Recommendations

To the Home Office and Tascor

Security, order and personal safety

- **6.1** All escorting staff should be effectively briefed about their duties. Briefings should include accurate and balanced information on risk and welfare issues. (3.17)
- 6.2 Physical force, waist restraint belts and handcuffs should be used in a planned and sequenced way, ensuring that each use is limited to situations where it is required to prevent harm or to enforce compliance when all other means, short of physical force, have failed. It should also be proportionate. (3.18)
- **6.3** Custody officers should understand how to respond to the unexpected in a calm and measured way. (3.19)
- **6.4** Escort staff should be informed of any detainees on self-harm monitoring case management immediately on their arrival at the IRC. (3.20)

Recommendations

Respectful treatment

- 6.5 Detainees should be held on a coach for the shortest time possible. (4.13)
- **6.6** Staff should not crowd around detainees in such a way as to intimidate them, except where close guarding is justified by credible information on specific risks. (4.14)
- **6.7** Staff should, at every stage, explain to detainees what is going to happen in sufficient detail to allay fears and enable them to prepare. (4.15)

Preparation for reintegration

6.8 Luggage should not make detainees easily recognisable as returnees on arrival. (5.7)

Good practice

6.9 Tascor staff made strenuous efforts to enable a detainee's luggage to be brought to her at the airport before departure. (4.16)

To Tascor

Section 7. Appendices

Appendix I: Inspection team

Martin Kettle
lan Dickens
Sandra Fieldhouse
Tamara Pattinson
Frances Russell
Hindpal Singh Bhui

Team leader Inspector Inspector Inspector Inspector