



Home Office

Border & Immigration Agency

THE INDEPENDENT POLICE COMPLAINTS COMMISSION OVERSIGHT OF BORDER AND IMMIGRATION AGENCY INCIDENTS AND COMPLAINTS CONSULTATION PAPER

JULY 2007

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1. SHOULD THE IPCC HANDLE BORDER AND IMMIGRATION AGENCY CASES IN THE SAME WAY AS IT HANDLES THOSE FROM ITS OTHER JURISDICTIONS (SUCH AS THE POLICE AND HM REVENUE & CUSTOMS) IN ORDER TO ENSURE CONSISTENT AND COMPARABLE PROCEDURES?

(PLEASE SEE PARAGRAPHS 2.4, 2.5, 2.6, 2.8, 2.9, 2.10, 2.12, 2.16, 2.17)

NEITHER YES, NO NOR UNSURE, SEE BELOW

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

The question does not admit of a yes or no answer because the IPCC has a different remit for police and for HM Revenue and Customs cases. For the police, it deals with all complaints, for HM Revenue and Customs it deals only with those that meet a threshold of seriousness.

The IPCC is also complementing different internal complaints procedures in the cases of the Border and Immigration Agency and HM Revenue and Customs. The Border and Immigration Agency internal complaints procedure was not set up to deal with allegations of violence, ill-treatment and misconduct in the course of enforcement operations. Nor has it been a satisfactory complaints procedure, whatever the type of complaint. We refer you in particular to the written and oral evidence of Dr Ann Barker, Chair of the Complaints Audit Committee, to the Home Affairs Select Committee of the House of Commons. The oral evidence was given on 13 December 2005. We highlight the following exchanges:

Q4 Chairman: ...In your first report, you said that the replies to two out of three complainants gave "indefensible" reasons. That is a very, very strong statement....

Q5 Chairman: Can you give us some examples of the sorts of things you saw which led you to use that language?

Dr Barker: Yes, the main problem is that the investigations themselves upon which the decisions are made are not conducted equitably. ...the complainant's side, as it were, is not properly investigated. There are paucities of independent witness statements because of delays, and evidence like CCTV or medical reports is often missing. ...The basic problem is the inequality of the investigation which is then built into the reply and that they do not withstand inspection.

...

Q16 Mr Clappison: Dr Barker, you call for more intensive investigation of complaints of serious misconduct and I note that you say that one third of complaints against individuals fit into that category which strikes me as being quite a high proportion. ...

Q17 Mr Clappison: ... Can you give us any more specific examples of what sort of cases they are, the serious cases, ...?

Dr Barker: Those are mostly allegations of assault. About half of them occur in detention centres and the other half occur in enforcement and removal. They are not uniformly and universally referred to the police, which is an area we are also concerned about. There is ACPO guidance which is very voluminous in its recommendations about asylum-seekers in the communities, but it is largely silent on the interface between the Immigration Service and the police.

Q18 Mr Clappison: What has happened now to those serious complaints? Was each one of them investigated?

Dr Barker: Well, I do not know, is the answer. Some of them are referred to the police, but one of the problems is that there is no written audit trail, so all you see in a file is "Police NFA", and you have no idea of what they have investigated, why it did not meet the CPS prosecuting standards and, therefore, was not pursued and that whole information is lost also to the investigator who is looking at it for IND on the balance of probabilities rather than beyond reasonable doubt.'

In its *Annual Report* for 2005-2006 (the most recent report published – the timescale for publication makes accountability problematic) the Complaints Audit Committee stated that the current Immigration and Nationality Directorate (IND, now BIA) system for handling complaints fell significantly short of each of the cabinet office criteria for handling complaints and was fundamentally at odds with the government's 'Modernising Britain' agenda (Chapter 1). The Committee found evidence gathering to be inequitable in three out of five cases audited (Chapter 2, section 1). While noting some progress in tracing and interviewing independent witnesses, the committee noted that this remains the exception rather than the rule (*ibid*). The Committee also found that searches for, and the collection of medical reports and CCTV tapes, had been deficient (*ibid*). They found an inherent bias in investigations in favour of staff (Chapter 2, section 2).

The Complaints Audit Committee audits allegations of violence in detention centres (excluded from the IPCC's

remit) and in the enforcement and removals process and we address findings that draw on their experience in both areas in our responses to the questions below.

We discuss below some areas of BIA activity to which we consider that the remit of the IPCC should be extended, by a combination of changes to primary legislation and to the draft regulations. Most notably, it should be extended to cover private contractors and operations at the juxtaposed controls.

There is also the question of the standards of conduct to which the BIA is working. Police activity is governed by the Police and Criminal Evidence Act (PACE) Codes of Practice. There is a power, but not a duty, to make modified versions of the PACE codes applicable to the Border and Immigration Agency. This is contained in section 145 of the Immigration and Asylum Act 1999. Where a modified version of the code is made, it must be followed, but there is no obligation to make it. The Joint Committee on Human Rights (JCHR) in its 14 May 2007 report (13th Report of Session 2006-7, Legislative Scrutiny: Sixth Report, HL 105, HC 538) on the UK Borders Bill, recommended that immigration officers exercising police like powers be subject to PACE. The JCHR stated

‘1.16 We are therefore concerned about the Government's reliance on Standard Operating Procedures on a number of counts: whether they will be sufficiently accessible by the public to satisfy the principle of legal certainty; whether they will receive sufficient public scrutiny when being devised; and whether their content will be sufficient to make it unlikely that the powers will be used in a way which interferes with the various Convention rights affected. We therefore recommend that the Bill be amended to provide that the relevant PACE Codes of Practice apply to the new powers of immigration officers to detain, search and seize pending the arrival of a police constable.’

On 2 July 2007, in the Grand Committee debates on the UK Borders Bill, an amendment was moved (amendment number 4, moved by the Lord Avebury, see cols 51ff of the report of the Grand Committee) that would have made designated immigration officers subject to PACE. Attention was drawn to the recommendations of the JCHR. The government rejected the amendment, stating that ‘we do not want to impose any greater burden on immigration officers than necessary’ but that some PACE-like requirements would be reflected in the standard operating procedures (The Lord Bassam, Col GC 58).

The standards expected of the BIA have been expressed with far less clarity and in far less detail than the obligations imposed on the police and it will be necessary carefully to consider what modifications to the way in which the IPCC operates are necessary to deal with this. Similarly where there are complainants who have little or no English.

As discussed below, we have grave concerns that the IPCC’s remit over the BIA does not extend to private contractors, or to the juxtaposed controls, or to the detention estate.

Those who complain of the BIA to the IPCC may be subject to removal from the UK and this may necessitate special procedures to ensure that evidence and witnesses are available to the IPCC, as discussed in our responses to the question below. Similarly, there may be complainants who have limited or no English.

ILPA would be reluctant to see suggestions that the IPCC’s mandate in BIA cases be extended rejected on the basis that the legislative vehicle identified to make the change could not also be used for, e.g., HMRC cases. This could cause delays and lead to failure to take necessary action.

2A. SHOULD SURVEILLANCE ACTIVITY UNDER THE REGULATION OF INVESTIGATORY POWERS ACT 2000 (RIPA) BE ADDED TO THE LIST OF SPECIFIED ENFORCEMENT FUNCTIONS IN THE REGULATIONS (PLEASE SEE PARAGRAPH 2.2)

YES

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

Surveillance activities are part of the wider mechanism of enforcement functions and these should properly be considered together.

2B. WOULD YOU LIKE TO SEE ANY OTHER ENFORCEMENT FUNCTION ADDED TO THOSE LISTED IN THE REGULATIONS? (PLEASE SEE PARAGRAPH 2.1 AND 2.2)

YES

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

The categories of incidents that can be the subject of a mandatory referral to the IPCC include ‘Serious corruption – restricted to the enforcement functions specified in the Police and Justice Act 2006’ (paragraph 2.7 of the Consultation paper). It is important that the IPCC are able to investigate matters referred to it with ease and the way in which the definition of enforcement functions limits the IPCC’s ability to investigate an incident of serious corruption, parts of which may fall within the category of enforcement functions and parts without, may cause problems in practice. For example, the enforcement functions set out in the Police and Justice Act 2006 include powers to obtain information, but make no reference to the passing of that information to third parties where, as might occur in a case of serious corruption, this is done to intimidate or to harass. This specific example might be cured by specifying the sharing or using of information among enforcement functions. In addition, we suggest that a more general consideration of the remit needed adequately to investigate corruption, parts of which fall within the enforcement functions currently described and parts without, is required.

We consider that the UK government has an opportunity in the UK Borders Bill currently before parliament to extend the remit of the IPCC without equivocation to cover private contractors. It is possible to do this before the regulations are brought into force and we have briefed peers proposing amendments to this effect. We had understood that it was the government’s intention to extend the remit of the IPCC to cover private contractors working for the BIA and for HM Revenue and Customs when it could identify a suitable legislative vehicle. However, the reply of Lord Bassam of Brighton in debates on the UK Borders Bill is not encouraging:

‘...The agency is currently exploring the potential of using contractors more widely to add further value to how the Border Immigration Agency delivers its services... Once the future functions are fully understood, we will consult on the appropriate level of oversight. The current feeling within Government is that, until that time, it would not be right to legislate on this issue, hence our caution. In the meantime, and pending completion of our exploratory work on widening the use of contractors, we will ensure that there is co-operation with the IPCC and other monitoring bodies, as built into contracts, so that the issue is covered.’ (Hansard, HL Report 16 Oct 2007 : col 667)

When the UK Borders Bill was considered by the Public Bill Committee, Liam Byrne MP, pressed the need to strengthen independent oversight of the operations of the BIA; for example:

‘...It is not possible for the immigration service to implement the radical reform that the Home Secretary announced last year unless there is much stronger oversight. I believe that the oversight should be independent and include the opportunity for communities to understand how the immigration service is performing in their area. I will be seeking to table Government amendments that provide for much stronger independent inspection arrangements. I envisage that they will apply to the enforcement functions that we are asking the immigration service to perform, under powers available already and those proposed in this Bill.’ (Hansard, HC Public Bill Committee 6 Mar 2007 : col 142)

However, if oversight is not extended to private contractors while so much of the BIA’s operations continue to be contracted out, the reality is less and weaker oversight of enforcement functions. Extending the remit of the IPCC without equivocation to cover private contractors would make good the Minister’s stated commitment in the Public Bill Committee towards strengthened independent oversight. This should be made a matter of the highest priority. While we do not accept that the UK Borders Bill cannot be used to do this, if it is not then the Criminal Justice and Immigration Bill currently before parliament should be used.

The urgency is highlighted by the Complaints Audit Committee stated in its Annual Report for 2005-6 (*op. cit.*) at Chapter 2 Section 3:

‘Previous CAC reports have cited concerns about the conduct of contract staff and the ability of contract monitors to oversee investigations into complaints of serious misconduct(Chapter 2, section 3). All of the weaknesses in investigation noted above were evident, and indeed more pronounced, in the handling of complaints against contract staff. These weaknesses were aggravated by investigations being left in large measure to managers, who appeared to have a vested interest in complaints not being proved against their

staff. To our minds these investigations were particularly lacking in independence. We found that:

- Evidence gathering in regard to alleged assaults was often cursory;
- Laxity in collecting evidence from asylum seekers meant that the balance was in most cases tipped heavily in favour of contract staff, and complaints were unsubstantiated;
- In most cases reply letters mirrored deficiencies in the investigation, rehearsed the staff's version of events and provided a justification for staff behaviour.

In his report on Oakington Immigration Reception Centre in July 2005 the Prison and Probation Ombuds took an identical view. He observed that investigations by contract staff against their own employees "lacked conspicuous objectivity and will always be vulnerable to criticisms of lack of robustness".

In the minutes of the IPCC meeting of 31 January 2007 it was stated

"assurances had been received from IND that arrests would only ever be carried out by an authorised officer. Relevant legislation did not permit this function to be delegated to contractors. However, if this legislative position changed then the IPCC's jurisdiction in relation to contractors would also need to be revisited"

This is of concern. Section 40 of the Immigration, Asylum and Nationality Act 2006 (Searches: contracting out) came into force on 31st August 2006 (i.e. it was already in force at the time of the IPCC meeting cited). This expressly extends powers to search and detain to private contractors. This suggests that there had been inadequate communication between the BIA and the IPCC.

The reference to the Prisons Ombuds also raises the question of the exclusion of the detention estate from the remit of the IPCC. We understand that this is intended to parallel the IPCC's remit within the criminal justice system, and that the Prison Ombuds will deal with similar complaints within detention. But we are alive to the risk that certain operations may risk falling between two stools, particularly as section 41 of the Police and Justice Act specifically excludes all functions under Part 8 of the Immigration and Asylum Act 1999, which covers not only the detention estate but also certain escort functions. We consider it vital that the IPCC be given jurisdiction over all cases that are held by the Prison Ombuds not to fall within his remit.

As to juxtaposed controls, we consider that primary legislation should be used to extend the IPCC's remit without equivocation to cover the juxtaposed controls. We were gratified to see the Lord Bassam of Brighton promise to give this consideration in debates on the UK Borders Bill, in the following exchange:

Lord Dholakia... You cannot have two groups of people, one of which in this country is ultimately accountable to the IPCC and the other abroad with similar powers but without that accountability. I am not asking for a reply now, because the Minister has been positive in his response so far, but can he look at that issue again? I obviously intend to discuss this with the IPCC to see how we will take the matter further.

Lord Bassam of Brighton: I will reflect on the noble Lord's last point. I do not believe that the IPCC could have jurisdiction abroad in this instance, but we need to look at the designation of those officers operating from abroad. The noble Lord has raised an important point and we will certainly have another look at it.' (Hansard, HL Report 2 July 2007 col GC50)

HM Chief Inspector of Prisons and the Children's Commissioner, to give two examples, have remits that extend to the juxtaposed control zones.

While it is correct that the IPCC do not have jurisdiction over police officers operating outside England and Wales, distinctions can be drawn between the work of the immigration officers and BIA staff overseas. The police may be operating over a wide geographical area, varying from case to case. The juxtaposed control zones are specific and fixed areas. It is practicable to extend the IPCC's remit to them. Article 12(6) of the Nationality, Immigration and Asylum Act 2002 (Juxtaposed Controls) Order 2003 (SI 2003/2818) makes provision for an offence in relation to the provisions set out in Article 12(1) by a constable or immigration officer in the exercise of their functions to be treated as having been committed in the County of Kent or the inner London area. A parallel provision could be devised to extend the remit of the IPCC to cover immigration officers, other Home Office staff and the police operating in the juxtaposed control zones.

The limitation of the remit of the IPCC to cases within England and Wales raises real concern about who will investigate if a person is injured on, for example, an aeroplane in the course of a removal. Consideration should be given to ensuring that the remit of the IPCC extends without equivocation to cover such cases.

3A. THE REGULATIONS WILL SPECIFY THAT CERTAIN CATEGORIES OF INCIDENTS MUST BE REFERRED TO IPCC (PLEASE SEE PARAGRAPH 2.7) . ARE THERE ANY OTHER CATEGORIES WHICH SHOULD BE INCLUDED?

YES

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW AND GIVE DETAILS OF WHICH CATEGORIES YOU FEEL SHOULD BE ADDED.'

There should be mandatory referral of incidents of serious self-harm. This would ensure that the categorisation of such incidents is properly verified and that any treatment of the person that led to the self—harming behaviour is identified.

It is for the IPCC to determine whether an incident falls within its mandate and great care will need to be taken to ensure that the BIA are not failing to refer cases because they are making their own decisions on what constitutes 'serious' assault, a criminal offence aggravated by discriminatory behaviour, or a breach of Article 2 or Article 3 ECHR. In the Complaints Audit Committee report of 2005-2006 (*op. cit.*), the Committee stated

'The CAC will play a critical role as the 'gateway' to the IPCC. We will be obliged to refer all complaints involving death, serious injuries and breaches of Articles 2 and 3 of the European Convention on Human Rights (right to life and prohibition of torture). We may also voluntarily refer complaints for which we assess independent, external scrutiny to be essential due to the gravity of the complaint or its exceptional circumstances.

...

We have integrated referral to the IPCC into our model decision-making matrix, and we look forward to working with officials from both IND and the IPCC in refining systems and procedures to ensure speedy referrals and effective working practices.'

These arrangements are not mentioned in the consultation paper. Reference is made to the new arrangements for a Chief Inspector under the UK Borders Bill but it is made clear that the Chief Inspector will not consider individual cases (para 1.3 of the consultation paper). It is unclear to us from the consultation paper whether the independent element in the referral of complaints, and the concentration of expertise, that was proposed in the Complaints Audit Committee model, is indeed a feature of the new system. If it is not, then we see no real prospect of the mandatory referral criteria operating effectively. To fulfil a referral role effectively will require considerable resources, as well as an overview of the range of complaints made against the BIA.

4. SHOULD THE IPCC HAVE THE POWER TO DIRECT THE POLICE TO INVESTIGATE CERTAIN BORDER AND IMMIGRATION AGENCY CASES? (PLEASE SEE PARAGRAPH 2.10 AND 2.11)

YES

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

This is essential because the BIA cannot be relied upon to do this. The Complaints Audit Committee in their Annual Report for 2005-2006 stated at 1.4

'4 Referral of all criminal allegations to the police.

It is imperative that allegations of criminal offences are formally reported to the police and formally recorded so that they can be properly handled.

- We are pleased to note that the reporting of allegations to the police has improved over the period of our audits, especially in the detention estate. 79% were referred in the first quarter of 2006.
- In some cases it remains the practice that referral is left to the complainant or to his/her solicitor. In our view this is entirely inappropriate. Many asylum seekers come from countries in which the police are oppressive and are feared. Asking asylum seekers if they wish to lodge a complaint with the police ignores cultural perceptions and misplaces the onus of responsibility.
- In the overwhelming majority of cases there is no correspondence about the police enquiry. The absence of a written audit trail and poor record keeping mean that the value of any evidence gathered to inform the police decision in regard to prosecution has been lost to IND.

See also the evidence of Dr Barker cited in our response to question 1. The Complaints Audit Committee also found grave delays in investigating complaints (Annual Report 2005-2006, Chapter 2 section 5 and noted that

‘In the overwhelming majority of cases, there has been no obvious reason why targets have not been met.’

Delay in a matter reaching the police can compromise the entire investigation and it is necessary to take all steps to avoid this. Referral to the police by the IPCC is necessary as a safeguard.

5. THERE WILL BE A WORKING CONVENTION THAT STATES THAT NO COMMISSIONER WITHIN THE IPCC WHO HAS ANY CONNECTION WITH THE BORDER AND IMMIGRATION AGENCY OR THE JUDICIAL PROCESS THAT UNDERPINS IT, WILL DEAL WITH ANY BORDER AND IMMIGRATION AGENCY REFERRALS. SHOULD THIS BE INCLUDED IN THE REGULATIONS? (PLEASE SEE PARAGRAPH 2.13)

SEE BELOW

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

It is very unclear what is meant by ‘who has any connection with the judicial process that underpins it’. Any arrangement must be clear. Putting it into the regulations might focus attention on achieving such clarity.

6. DO YOU AGREE WITH THE RIGHTS OF APPEAL? (PLEASE SEE PARAGRAPH 2.18)

NO PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

There should be a right of appeal against the non-recording of a complaint. We note the comment at paragraph 2.18 of the consultation paper that in the event of a non-recording of a complaint the IPCC could exercise its call-in power, but that does depend on the IPCC knowing anything about the complaint. A potential complainant may be removed from the UK, or facing such removal and may be isolated and not know their rights. Not only should there be a right of appeal but a duty to inform them of this. This is, we fear, still inadequate, and will offer incomplete protection, but it at least improves the chances that a complaint that ought to reach the IPCC will do so. We are fortified in this view by the documented concerns about the BIA’s complaints handling, as described in our responses above. We have a great deal of respect for the current Complaints Audit Committee and the vigour with which they are undertaking their task but, as their published report demonstrates, there is still a very long way to go.

7. IS THE PROTOCOL REGARDING THE REMOVAL OF COMPLAINANTS A SUITABLE WAY OF ADDRESSING THE ISSUES REFERRED TO IN PARAGRAPH 2.20?

NO

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

It is proposed that the regulations will include a provision applying to cases which would lead to an abuse of the system by those wishing to delay removal but will not include provision (which will be the subject of a separate protocol) whereby the IPCC can delay removal of a complainant or witness. The imbalance is striking and has no place in the final version of the regulations.

The IPCC must have power to delay removal of a complainant or witness. The BIA cannot be relied upon to cooperate in this, as was demonstrated in the case of *R (Karas and Miladinovic) v Secretary of State for the Home Department* [2006] EWHC 747 (Admin), where Munby J stated

“I am driven to conclude that the claimants’ detention was deliberately planned with a view to what in my judgment was a collateral and improper purpose - the spiriting away of the claimants from the jurisdiction before there was likely to be time for them to obtain and act upon legal advice or apply to the court. That purpose was improper. It was unlawful. And in my judgment it renders the detention itself unlawful.”

“What the present case and others like it reveal, in my judgment, is at best an unacceptable disregard by the Home Office of the rule of law, at worst an unacceptable disdain by the Home Office for the rule of

law, which is as depressing as it ought to be concerning.”

It would be a matter of grave concern were people to be spirited away from the jurisdiction before there was a chance for the IPCC to investigate their complaints or take their testimony of witnesses. Given the evidence that has come to light in cases such as *Karas*, protocols cannot be relied upon and the powers of the IPCC should be set out on the face of regulations.

The question of whether there is ‘abuse’ must be a matter for the IPCC alone and not for the BIA and should never operate to stop the referral of a complaint to the IPCC. If the BIA can decline to refer a complaint on the basis that it is ‘abusive’ there will be no accountability, no transparency, and a risk that gross misconduct not be investigated.

It is essential that any action in the course of removal could form the subject of a complaint. As described above, it is unclear what redress is proposed for any abuse after take-off of an aeroplane, for example.

8A. DO YOU THINK THE REMIT OF THE IPCC IN RELATION TO THE EXERCISE OF ENFORCEMENT FUNCTIONS BY IMMIGRATION OFFICERS AND OFFICIALS IS CLEARLY EXPLAINED / WILL BE CLEARLY UNDERSTOOD?

NO

PLEASE EXPLAIN THE REASONS FOR YOUR RESPONSE BELOW

The remit of the IPCC in these cases is very complex. Under section 41 of the Police and Justice Act, whether the IPCC has jurisdiction depends upon:

Whether a person is an immigration officer or an official of the Secretary of State

- Whether the person is exercising specified enforcement functions
- Whether those functions were conferred by or under Part 8 of the Immigration and Asylum Act 1999
- The seriousness of the conduct
- The geographical location where the conduct takes place

As described in our responses above, immigration officers and officials of the Secretary of State are not subject to the PACE codes and the standards governing their conduct have been the subject of criticism by the Joint Committee on Human Rights and others. This makes ascertaining whether a case falls within the criteria described above all the more difficult. We do not consider that there will be any clarity until private contractors are included within the IPCC’s remit. As detailed above, it will be important to ensure that there are no gaps between the remit of the Prison Ombuds and that of the IPCC.

8B. HOW IS THIS BEST COMMUNICATED TO YOUR OWN STAKEHOLDERS TO ENSURE THE REMIT IS CLEAR?

PLEASE RATE THE FOLLOWING OPTIONS BY HOW EFFECTIVE THEY WOULD BE IN COMMUNICATING THIS INFORMATION.

POSTAL LEAFLET **SEE BELOW**

EMAIL LEAFLET **SEE BELOW**

WORKSHOPS **SEE BELOW**

PRESENTATIONS **SEE BELOW**

ILPA and its members are likely to be able to manage if the IPCC has a clear and comprehensive website setting out its remit in documents that are clearly dated and sufficiently detailed. This will assist legal representatives in understanding how to assist a person to make a complaint, and how to ascertain whether the BIA has correctly handled a complaint, including referring it to the IPCC. We are happy to facilitate informal discussions or

meetings with the IPCC on specific points and often find these more useful than large 'stakeholder' events. We welcome the opportunity to hold discussions with the IPCC on specific points.

We would rather that resources were directed at ensuring that our clients, and those people with no legal representation, understand the remit of the IPCC. Even if the IPCC does not cover the detention estate, or juxtaposed controls etc. these are areas in which information about its mandate could usefully be communicated to those who are very isolated and may have been the victim of conduct in enforcement action that should be referred to the IPCC or conduct that in future should be referred to the IPCC. There may be scope for working with the Prisons Ombuds to ensure that people can see where to direct their complaint. There should be information in the Asylum Screening Unit, in all BIA offices, in all reporting centres and in all Home Office provided accommodation about complaints including complaints to the IPCC. It is one thing to rely on legal representatives to bring the role of the IPCC to the attention of their clients but many people will have no legal representative and it is important to reach them.

8C. ARE THERE ANY OTHER OPTIONS THAT YOU FEEL WOULD BE EFFECTIVE IN COMMUNICATING THIS INFORMATION?

PLEASE GIVE DETAILS BELOW AND RATE EFFECTIVENESS

CONFIDENTIAL ADVICE LINES, OPERATING IN DIFFERENT LANGUAGES, MAY BE OF ASSISTANCE TO THOSE WHO WOULD OTHERWISE STRUGGLE WITH WRITTEN MATERIALS.

A LOT / A LITTLE / NOT AT ALL / UNSURE **(DELETE AS APPROPRIATE)**

A LOT / A LITTLE / NOT AT ALL / UNSURE **(DELETE AS APPROPRIATE)**

A LOT / A LITTLE / NOT AT ALL / UNSURE **(DELETE AS APPROPRIATE)**

DO YOU WISH YOUR RESPONSE AND NAME TO BE KEPT CONFIDENTIAL?

NO