BiD Bail for Immigration Detainees

Autumn Legal Advice Survey

November 2025

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

Legal Advice Survey – Autumn 2025

About BID

BID is an independent national charity established in 1999 to challenge immigration detention. We assist those held under immigration powers in immigration removal centres and prisons to secure their release from detention through the provision of free legal advice, information and representation. Alongside our legal casework, we engage in research, policy advocacy and strategic litigation to secure change in detention policy and practice.

BID is entirely reliant on charitable donations, and we are not in receipt of legal aid funding. BID does however call for the automatic provision of civil legal aid to everyone held in detention under administrative immigration powers, without the requirement of a merits test.

BID operates a telephone advice helpline for people in detention to be able to contact us and receive support on submitting their bail applications. With the assistance of barristers acting pro bono, BID prepares and presents bail applications in the Immigration and Asylum Chamber of the First-tier Tribunal for the most vulnerable detainees, including long-term detainees, people with serious mental or physical ill-health, or people who are primary carers separated by detention from their children, and who are unable to obtain legal representation. In 2014 BID employed a Legal Manager to advise and provide occasional representation for people challenging deportation on Article 8 ECHR grounds.

One of BID's key aims is to improve access to justice for people in detention. To achieve it, and to improve our own advice service, BID speaks directly to people in detention twice a year so that we can document their experiences of obtaining and receiving legal advice while in detention – known as the 'Legal Advice Survey'. This is the 23rd survey we have carried out.

Introduction

"I've completely lost trust in the system..."

Individual currently held in detention without any legal representation, September 2025

Depriving someone of their liberty is one of the most severe actions that a state can take and must therefore be subject to the highest standard of legal safeguards. Yet in the UK, over 20,000 people per year are being detained indefinitely for the purpose of immigration control with no guarantee of access to legal advice, representation and the courts for people to challenge their detention.

The decision to detain lies solely with the Home Office, without any initial judicial oversight, and this often leads to flawed decision-making. Evidence shows that the Home Office has repeatedly broken the law in its operation of immigration detention. In the period 2024-2025 alone, the Home Office was required to pay £10.4 million in compensation to 334 people it was found to have detained unlawfully.[1] Additionally, as HM Chief Inspector of Prison's most recent report noted, over half of

[1] Home Office Annual Report and Accounts 2024 to 2025 (period ending March 31st 2025)

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

people in detention were released to the community, demonstrating that their detention was unnecessary and went far beyond the mandated remit of 'last resort'.[2]

Detention is deeply harmful to individuals,[3] and conditions in detention are worsening. Since our last survey, the Prison inspector reported some of the 'worst ever' conditions in detention, with health services 'stretched to breaking point' at Brook House and Harmondsworth IRCs.[4] Equally damning, the Independent Monitoring Board's (IMB) annual report found that detention centres have become 'increasingly unsafe', with people 'exposed to unnecessary harm' and detained for long periods 'with no real prospect of removal'.[5] Despite these harms having been identified, the government continues to prioritise the expansion of the detention estate, with plans to re-open Campsfield House and Haslar IRCs before the end of the year.[6] This comes alongside an increase in policies designed to significantly increase the use of detention and deportation, from the ongoing Border Security, Asylum and Immigration Bill to the recent UK-France deal, which leaves people with extremely short timeframes to challenge their removal.

Given this context, quality legal advice and representation for those in detention is ever more essential. However, this report shows that people continue to face significant barriers to accessing legal services for both bail and immigration matters, resulting in strikingly low levels of representation.

In large part, this is tied to the state of civil legal aid in the UK. The cuts to civil legal aid brought about under the Legal Aid, Sentencing and Punishment of Offenders Act (LASPO) in 2013 removed non-asylum immigration work from the scope of legal aid, with devastating results for people in detention. Although bail and judicial review remain in scope, the lawfulness of detention and the likelihood of bail being granted are closely interrelated with a person's substantive immigration case. Alongside the impact of LASPO, legal aid rates have not been increased for almost thirty years, leaving providers working at very low rates and resulting in severe lack of capacity for immigration and asylum work across the country.[7] Contractual changes to the legal aid-funded Detained Duty Advice Scheme in 2018 have also led to significant concerns around the quality of the legal advice being provided.[8]

BID's bi-annual legal advice surveys continue to expose the reality of access to justice for people in immigration detention. This edition reveals that representation levels in detention are **the lowest they have ever been** since we started monitoring. Our recommendations following this survey should therefore be taken as a matter of extreme urgency.

---

[2] HM Chief Inspector of Prisons for England and Wales, *Annual Report 2024-25,* July 2025
[3] see for example British Medical Association, *Locked up, locked out, health and human rights in immigration detention*, Nov 2017 Medical Justice, *Failure to Protect from the Harm of Immigration Detention*, 2019; Brook House Inquiry, *The Brook House Inquiry Report, VOLI-III*, 2023
[4] HM Chief Inspector of Prisons for England and Wales, *Annual Report 2024-25,* July 2025
[5] Independent Monitoring Boards, *National Annual Report 2024,* June 2025
[6] Home Office, Campsfield IRC, June 2025; Home Office, Haslar IRC, October 2025
[7] Jo Wilding, *No Access to Justice 2: Mapping the UK's continuing immigration and asylum legal advice crisis,* 2025
[8] *See evidence given in* R (Detention Action) v Lord Chancellor [2022] EWHC 18 (Admin); Joint Committee on Human Rights, *Immigration Detention Sixteenth Report of Session 2017-2019, pg 20,* 2019

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

Methodology

The report is designed to evaluate levels of access to immigration legal advice for people detained in the UK under immigration powers in Immigration Removal Centres (IRCs). We produce separate reports that assess access to legal advice for people detained under immigration powers in prisons.

The sample was taken from who fitted the following criteria:

- Had open files with BID from March 1st 2025 until 31st August 2025;
- Had signed letters of authority consenting to the disclosure of their anonymised information; and
- Were detained in IRCs

Or

- Completed the survey with a BID representative in person at an IRC in July and August 2025; and
- Gave verbal and written consent to complete the survey in person

Participants completed the surveys via one of two methods. The first method was by phone, the second in person. Both methods used the same survey questionnaire, which includes a mix of quantitative, closed questions and qualitative, more open-ended questions. Where qualitative answers were given, answers were transcribed as accurately as possible.

Telephone interviews were completed between 22nd September and 8th October 2025 by BID volunteers, with supervision from a BID staff member. Volunteers telephoned 39 people who fitted the first set of criteria listed. Of those contacted, 22 went to voicemail, were the wrong number, or the phone was switched off. Three people answered but declined to take part in the survey. 14 people gave verbal consent to complete the survey over the phone. Respondents were also given the option to end the survey at any time, and to only answer the questions they felt comfortable with. Seven of the interviews required an interpreter.

In line with our March 2025 survey approach, we also undertook further surveys in person at Tinsley House, Brook House, Yarl's Wood and Harmondsworth IRCs to ensure we included enough people in the study. We spoke with 15 people who gave verbal and written consent to fill in the surveys in person. Everyone was given the same options to terminate the interview at any point and only to answer questions they felt comfortable with.

A total of 29 respondents completed surveys. Out of those people, five were held at Harmondsworth, four at Colnbrook, eight at Brook House, six at Tinsley and six at Yarl's Wood. We did not speak with anyone at Derwentside or Dungavel, the UK's other two IRCs.

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

Survey Findings

Levels of representation

Only 11 out of 29 people surveyed had an immigration lawyer working on their case (38%). This is a further drop compared to our last survey in March 2025, in which 42% of respondents were represented[9], and is an exact reflection of another survey on legal advice in detention by the Jesuit Refugee Service which also found that only 38% of respondents had legal representation.[10] Two people in our survey did not know whether they are represented or not, and others who eventually said 'yes' or 'no' had also expressed uncertainty about their answer. This flags a repeated issue of communication between people in detention and legal representatives.

The length of detention of people surveyed ranged from one day to 11 months, with an average of 108 days. Eight people had been detained for more than 3 months – evidence that they could not be removed 'within a reasonable timeframe' in line with the Home Office's policy on the use of detention[11] - and still had no immigration lawyer.

Of those respondents who are represented, eight out of 11 people had legal aid lawyers via the Detained Duty Advice Scheme (DDAS) while three had obtained lawyers privately. **In total, only eight of 29 people surveyed were represented by legal aid lawyers (28%)**. This is supported by a HMIP report on Colnbrook which found that only 45% of people they surveyed said they had received free legal advice, let alone representation.[12]

These numbers are shockingly low. They represent a continuing downward trend in levels of immigration advice for people in detention since legal aid cuts came into force in 2013 as a result of the Legal Aid, Sentencing and Punishment of Offenders Act 2012 (LASPO). Prior to the cuts coming into force in 2013, BID's November 2012 legal advice survey found that 79% of respondents had legal representation, 75% of which were through legal aid. This falling trajectory of representation for people in detention is a cause for significant concern, as people are being deprived of access to justice and are denied their right to liberty as a result.

Reasons for low levels of representation

Those who were unrepresented gave a range of answers when asked why they did not have an immigration lawyer. More than 30% of respondents gave reasons that were financial, with five people saying that they simply could not afford a lawyer – despite the apparent availability of free legal advice through DDAS. Four people said they had been told their case had no merit, and one said their lawyer dropped the case after bail was rejected, while another had lost their lawyer when moving from prison

[9] Bail for Immigration Detainees, *Legal Advice Survey March 2025,* 2025
[10] Jesuit Refugee Service, *Accessing Legal Advice in Detention,* July 2025
[11] See Home Office's policy: HO Detention general instructions Version 5.0, 18 August 2025
[12] HMIP, *Report on an unannounced inspection of Colnbrook Immigration Removal Centre (20 January – 6 February 2025),* May 2025

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

to an IRC. Two people said they were not aware they needed a lawyer due to lack of information given to them in detention, and three people were not sure why they were not represented. Again, uncertainty arose as a key theme.

One person tried to find a lawyer on six different occasions through legal aid but was told the case had no merit and was not taken on for either his substantive case or for bail. He then applied for bail himself with the support of BID and the application was granted, demonstrating the poor quality of merit assessments and the failure of DDAS.

Of the 18 people without representation, 16 had *never* had a lawyer while in immigration detention. The lack of representation clearly has negative impacts not only on case outcomes, but on the entire legal process. For example, of the 11 people with lawyers, only one person did not understand what stage their immigration case was at whereas 33% of unrepresented participants did not even know the current status of their immigration case. This reflects the complexity of UK immigration law, and the difficulty of navigating it without representation.

Eight people had resorted to doing work on their own immigration case. However, the majority of people had not, citing reasons from it being 'too complicated' to 'I can't read very well, and I don't have my documents'.

Bail

Of the 11 participants who were represented, only five people's lawyers had applied for bail for them. Of those five, only three were legal aid lawyers while the other two were private. Given the significant implications for people's liberty, it is highly concerning that more than half of representatives had not applied for bail for their clients, and this represents a decrease in comparison to our past reports.

Only one person said their lawyer was waiting for a medico-legal report in order to apply for bail, while the rest said they did not know why their lawyer had not applied for bail for them and one added that it had been 'very difficult' to get in contact with his lawyer at all. Two people with lawyers had applied for bail themselves, while two had applied with the support of BID. **The fact that people required free legal advice from a charitable organisation despite having legal representation flags significant problems with the quality of the representation.** Lawyers should be applying for bail for their clients at the earliest possible opportunity to secure their freedom. Once released from detention, people are better able to access necessary resources such as expert or other documentary evidence and to communicate with their lawyers. The lawyers are in turn better able to progress their clients' main immigration case.

51% of all people in immigration detention during the year ending June 2025 were released on bail[13], demonstrating it is more likely than not that people will be granted bail and that their detention was

[13] Home Office, *Immigration detention detailed datasets, year ending June 2025,* 2025

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

unnecessary. However, without adequate legal support for bail applications, more people remain in detention deprived of their liberty.[14]

Immigration legal advice in prisons

"No, nothing, zero..."

BID publishes specific reports on legal advice in prisons. However, we also ask respondents in IRCs about their access to legal advice in prison if they were previously held there. Out of 21 participants who had previously been in prison, only three (**14%**) were given any advice at all relating to their immigration case while held there. Only one of those received legal advice from an immigration lawyer, who was a privately paid lawyer, while the other two explained the advice came from prison staff or BID.

One person said they were served deportation papers in prison and subsequently missed their appeal deadline as they did not receive any legal advice and were unsure what to do.

One person added that 'no one from the Home Office told me I would be taken to the removal centre after I was released', reflecting the general poor communication between the Home Office and people being held under immigration powers in prison. It is imperative that these communication issues are addressed, as many people find their mental health considerably worsens after expecting to be released upon their Conditional Release Day and then continuing to be detained.

The Detained Duty Advice Scheme (DDAS)

"The solicitors let me down, they said they would call back but they didn't."

Everyone detained in an IRC is eligible for 30 minutes of free legal advice under the Detained Duty Advice Scheme, or DDAS. During the appointments, solicitors should establish whether a case can be taken on (if it qualifies for legal aid, including whether it requires further investigation) as well as giving advice on bail to everyone regardless of their substantive immigration case details.

Most participants were aware of the DDAS, with 27 out of 29 people saying they knew that free advice was available. However, two people said it took at least three weeks for them to find out about the DDAS, while one person said he only found out about the DDAS once he had already paid a private lawyer, which he said was 'cruel' as he was in very difficult financial circumstances.

19 people said they had made appointments. Two people said they had tried but had not yet been given an appointment, while one person said there was no point even trying because he had heard from others that 'the lawyers don't take cases on when it's too complicated'. Others said they had

[14] This is evidenced by the high level of bail grants for clients supported by BID – in the reporting year 2023-2024, 329 of 409 (80%) cases prepared by BID were granted bail or bail in principle.

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

made multiple appointments – with one person trying six times and still not speaking with a legal representative.

Over 50% of those who had made appointments were seen by a lawyer within a week. However, one person waited two and a half months for an appointment while five others had to wait for more than three weeks. This delay means people miss key deadlines - for example, people under the UK-France scheme only have seven days to make representations to the Home Office.

Securing a DDAS appointment does not guarantee access to legal advice. The consistency in quality across appointments was poor. Only 3 people received their allocated 30 minutes of advice. Out of 19 people who had appointments, 12 shared that the conversations they had were very general, they received no advice or the advice was unrelated to their case. Only three people were given advice on bail during the appointments. One person had a 5-minute phone call during which the solicitor told him he should 'just take voluntary deportation'. One person said 'we spoke for 14 minutes, I didn't understand [anything]. Nothing else happened, and I've had no replies since'.

Five people said that the solicitor said they would get back to them after the phone call but never did. This lack of follow up is exacerbated by the fact that many lawyers do not share their contact details after the calls. Fewer than 50% of respondents received the lawyer's contact details after their appointments, leaving them unable to confirm whether they have been taken on or not.

Of those who had DDAS appointments, 79% only ever received advice over the phone. One participant said that this made it 'difficult to explain things'. HMIP's report on Colnbrook also found that most DDAS appointments were by phone and confirmed that this was 'not popular with detainees'.[15] We are also concerned that this remote-only approach can lead to vulnerabilities being missed, which potentially have significant bearing on someone's legal case as well as their wellbeing.

Only five out of 19 people (**26%**) answered 'yes' with certainty when asked whether the DDAS lawyer had taken on their case after their appointment. Of those, three were only taken on after multiple appointments with different lawyers, demonstrating that their cases had merit yet were wrongly assessed initially. The remaining respondents either were not taken on, had been taken on but then dropped, or were uncertain about whether they had a legal representative after the appointment. Out of everyone who spoke with a legal advisor through the DDAS, only one person was given any advice in writing despite this being an obligation for DDAS advisors.

When asked why they were not taken on after the appointment, the majority of participants said they did not know. Two participants gave reasons related to merit, and one that their case was 'too difficult'. Two participants were told that their case was not in scope for legal aid, and two were asked to pay

[15] HMIP, *Report on an unannounced inspection of Colnbrook Immigration Removal Centre (20 January – 6 February 2025)*, May 2025

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

privately instead, with one participant asked by a solicitor to pay £5000 or he would not be able to take on his case.

One individual experienced a range of inadequate reasons for not being taken on after four different DDAS appointments: "One solicitor refused me because of the lack of an interpreter, another one said I needed to pay £2000 before he could start the case. Another solicitor I called twice to find out about my case as I had not heard from him, and he cancelled his services because he said I called too often. The last one...gave no explanation."

He was then taken on by the fifth solicitor he spoke to and was granted bail within two weeks, after being in detention for five months.

The issues do not stop at the point of being taken on: for many people who were taken on, the poor – or total absence of - communication continued. One individual's solicitor did not reply for two weeks and then told him they were going to drop his case four days before his appeal deadline. He questioned 'why did they take my case on if they thought they wouldn't get paid enough?'

Exceptional Case Funding

When LASPO came into force in 2013, non-asylum immigration cases were taken out of scope for legal aid. However, Exceptional Case Funding (ECF) was introduced to enable people to apply for legal aid on specific grounds: where the absence of legal aid would result in serious unfairness, a breach of human rights and/or denial of effective access to justice. Despite multiple participants being told they could not be taken on as their cases were not in scope for legal aid, or being asked to pay privately, only one person was informed by the lawyer about Exceptional Case Funding (ECF) and no applications were made. This is highly concerning, as it suggests that some solicitors are encouraging people to pay privately where legal aid-funded routes have not been explored. There is also a lack of clarity around whether work on the time-consuming ECF applications is covered by legal aid, which makes legal representatives reluctant to take it on.

BID's report on ECF[16] found that ECF applications are widely recognised by legal professionals as being too complicated to complete without legal advice. The report also shows that where applications are made with legal support, the chance of securing a grant is high – so it is of vital importance that representatives make these applications on people's behalf. Whilst the government has acknowledged that legal aid rates should be increased in order to encourage legal aid lawyers to take on complex cases,[17] this has yet to be implemented.

[16] Bail for Immigration Detainees, Hurdle After Hurdle: The Struggle for Advice and Representation through Exceptional Case Funding, 2023
[17] Ministry of Justice, *Civil legal aid: Towards a sustainable future - Consultation response*, July 2025

1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

Use of technology in detention

"[Social media] is blocked on purpose so we don't have access to the outside world..."

BID has been tracking people's access to IT in detention over a number of years. Ability to access computers and the internet is one of the key differences between prisons and IRCs and is often vital to individuals' legal cases. In past reports, important websites have been blocked – for example, solicitors' websites and human rights reporting websites.[18]

Out of all survey respondents, 61% of people said they used the internet to research their case. Seven people said they encountered blocked sites while they were researching. Some examples included sites for 'talking to solicitors online on websites with free chat options' as well as 'websites with information about immigration bail'. Many people also mentioned that social media sites are blocked, as well as Chat GPT.

There is no clear justification for why these sites are blocked. Not only does it disrupt individuals' ability to gather evidence for their legal cases, it also compounds the social isolation that people experience in detention centres as they have been taken away from their communities. Social media websites continue to be listed in the 'prohibited lifestyle categories' of blocked material under *DSO 04/2016: Access to the internet within the immigration removal estate.*[19] However, there is no explanation for this restriction, and it is not compatible with the 2001 Detention Centre Rules which state that detention is not punitive and that IRCs should provide a 'relaxed regime with as much freedom of movement and association as possible'.[20]

Participants also described experiencing additional issues with technology, such as phones not working well, which had a detrimental effect on their case and their wellbeing. One man described that he could see calls come up on his phone but could not answer them, which means he had missed calls from legal representatives and from family who were helping him locate his documents.

Additional issues

- People with vulnerabilities, particularly related to mental health, are often the least likely to be able to access legal advice. One of the participants was very vulnerable, and IRC welfare staff explained that they had to personally help him find a lawyer as they were worried he was 'falling through the cracks'.
- The problems with follow-through and consistency from legal advisors is deeply damaging to people's mental health. One person shared that 'people in detention are self-harming when they are expecting some change, or someone to contact them, and it doesn't happen'.

[18] Bail for Immigration Detainees, *Autumn 2022 Legal Advice Survey,* December 2022
[19] Home Office, *Detention Services Order 04/2016: Access to the internet within the immigration removal estate*, updated 2024
[20] *Detention Centre Rules 2001*, s 3(1)

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

Conclusion & Recommendations

People in immigration detention are being deprived of their liberty and face the prospect of permanent punishment via irreversible separation from their communities, families, children and lives in the UK. Given the severity of these implications, it is vital that their access to justice is safeguarded. Effective access to the courts to challenge detention and uphold individuals' rights can only be ensured through quality legal advice and representation, especially in light of the complexity of UK immigration law.

The findings in this report provide clear evidence that people being detained under immigration powers in the UK are facing severe difficulties accessing legal advice and representation. The minimal systems in place to provide advice under legal aid – namely the DDAS – are broken, and sustained, quality legal representation for people in detention has become a rarity.

BID believes immigration detention is inhumane, unnecessary and unjust. We campaign for an end to the deprivation of individuals' liberty for the purposes of immigration control. However, while detention for immigration purposes continues to exist the following recommendations must be implemented as a matter of urgency.

1. Individuals being held in detention should be automatically allocated a legal aid immigration lawyer within 48 hours of their detention under immigration powers. This lawyer should be retained until they are removed from the UK or are granted bail / leave to remain.
    - Even if a case is deemed to have no merit, lawyers should retain cases for review in case of circumstantial change e.g. passage of time in detention. This will avoid the need for repeat appointments and wasted legal advice costs and time.

2. All immigration cases should be brought back into the scope of legal aid, reversing the effect of the 2012 Legal Aid, Sentencing and Punishment of Offenders Act (LASPO).

3. In the interim, immigration lawyers should receive legal aid funding for ECF applications regardless of the outcome.
    - Legal aid lawyers should be permitted to self-authorise grants of ECF without needing to submit application forms through the Legal Aid Agency. This will streamline the ECF process. Grants of ECF will remain subject to audit to ensure the procedure is being properly followed.

4. The use of prisons for detaining people under immigration powers must be ended.

5. In the interim, we recommend an urgent review of the Telephone Legal Advice Service and the introduction of in-person legal advice for people detained in prisons.

Bail for Immigration Detainees
1b Finsbury Park Road, London N4 2LA
Tel: 020 7456 9762, Fax: 020 7226 0392
Email: tigs@biduk.org

a. People should have access to legal advice schemes in prison as soon as the Home Office engages with their immigration matter, including those still serving criminal sentences.
b. People should be informed as soon as possible that they will be detained under immigration powers at the end of their prison sentence.

6. In lieu of Recommendations 1 & 2 being implemented, the DDAS must be reviewed in the following ways:
    a. The LAA should carry out an in-depth review of the quality of advice given by providers on the rota, particularly regarding written advice. Providers should be removed if they are not providing sufficiently high-quality advice (including on lack of merits), routinely do not take on cases, or fail to provide written advice following their appointments.
    b. The LAA should track whether individuals had a DDAS appointment and if so whether they were taken on. This may require monitoring in collaboration with the Home Office or individual IRCs.
    c. The LAA should enable and assist people to seek advice from any non-surgery legal aid lawyer of a person's choosing.
    d. There should be automatic entitlement to legal aid representation at bail hearings at least every 28 days (in line with the statutory right of people in detention to apply for bail every 28 days or sooner if there is a change of circumstances).

7. Legal advice providers should be encouraged to send representatives to surgeries in IRCs in person.

8. The decision to prohibit social media in IRCs should be reviewed and reconsidered.