



## **All-Party Parliamentary Group on Immigration Detention**

### **Inquiry into quasi-detention**

### **Questions for Migrant Help**

#### **Question regarding Napier Barracks**

##### **1. Services and staff**

Please confirm / explain:

- a) What services Migrant Help (MH) provides in relation to **Napier Barracks**, both on site and remotely.

Migrant Help has ensured that we had a presence on site at Napier since it was first commissioned. We proposed the creation of two Community Support Workers (CSW) posts which were funded jointly by Migrant Help's charitable funds and the Home Office. These posts were outside of the AIRE contract and were designed to support the residents on site with accessing social, emotional and practical support. The CSWs assisted in planning meaningful activities on site, identified gaps in provision and created links with the wider sector to bridge these gaps e.g., provision of clothing.

More recently we have moved to a traditional AIRE service with two staff members present on site Monday to Friday 9 - 5.

In addition to engaging with the staff on site, the clients accommodated at Napier can contact Migrant Help in the following ways:

- 24-hour free asylum advice helpline – open 365 days a year with access to interpreters
- Webchat
- Self-service portal
- Raise an Issue function on Migrant Help's website

- b) How many MH staff are present on site, their responsibilities, level of experience and what form of supervision is provided.

As per the newly implemented, AIRE-based model, Migrant Help has one Senior Client Adviser and one Client Adviser based on site at Napier. They are fully trained in line with the mandatory and

statutory requirements as set out in the Statement of Requirements, Schedule 2 of the AIRE contract, alongside additional Migrant Help training.

They can support all client on site with any questions, queries and complaints and will log all issues within our ELLIS database. Any issues reported are then forwarded to the relevant party to resolve, e.g., the Accommodation Provider for maintenance or food related matters, UKVI for relocation requests or changes in circumstances.

The team also continues to support the wider sector in arranging activities on site and promoting / signposting where appropriate, e.g., allotment project. The advisers also play a key role in communicating crucial messages to the clients, therefore supporting partner organisations, such as Clearsprings, the health support etc.

The Senior Adviser line manages the work of the Client Adviser, ensuring quality and consistency, they also lead on the relationships with partners and attend stakeholder meetings. The Senior Adviser is managed by the Deputy Director of Asylum Services, who ultimately oversees the site from a Senior Management perspective.

## **2. Safeguarding of vulnerable people**

Please confirm / explain:

- a) How the weekly welfare check of residents provided by MH is carried out, including how and to whom any safeguarding concerns are raised. We would be grateful for a copy of any relevant written documents (e.g. forms) used during the check.

Migrant Help does not carry out weekly welfare checks. This is the role of the accommodation provider.

- b) What safeguarding mechanisms and expertise MH have in place in relation to residents who are vulnerable, including age-disputed children, victims of torture and trafficking, and those with serious mental health conditions.

Migrant Help has been supporting vulnerable migrants for nearly 60 years and worked with asylum seekers in relation to asylum support since NASS support started. The safety and wellbeing of our clients are at the heart of everything we do.

All our frontline staff are trained in safeguarding and are familiar with the relevant policy, procedures and local referral pathways. We ensure that our clients are aware of any specialist support available to them and will signpost to relevant local and national services.

Where there is an immediate, urgent risk and/or potential for harm, we will contact Emergency Services and complete an Incident Report which is shared with the Accommodation Provider and UKVI. In addition, we will complete a safeguarding referral to the Local Authority Social Services

team where necessary.

- c) What policies / procedures are followed in the event that a resident discloses they are a child, or MH staff have reason to suspect this. Please provide copies of any relevant written documents.**

A temporary process was put in place following Kent County Council's withdrawal from taking on UASC. If a client claims to be under 18, we will contact UKVI to establish whether a Merton compliant age assessment has taken place. If a Merton compliant age assessment has been completed, we will signpost the client to their legal representative, who would need to challenge the Home Office on the age assessment decision. We would not refer to Social Services.

If a Merton compliant age assessment has not been completed, we would complete a referral to the local authority's safeguarding team and request that an urgent age assessment is completed. We would highlight the safeguarding risk of the potential child being housed in adult accommodation. We would also complete a Safeguarding Incident report which is shared with the Accommodation Provider and the Home Office Safeguarding Hub.

- d) What policies / procedures are followed in the event of a resident experiencing a psychiatric emergency (e.g. a self-harm or suicide attempt). Please provide copies of any relevant written documents.**

If Migrant Help is the first contact regarding an incident of this nature, we immediately contact the emergency services. We also make the Accommodation Providers and safeguarding teams aware via a 'Request for Assistance'. We contact the Home Office and request a reconsideration of whether the asylum seeker should continue to be housed at Napier.

We would also signpost the client to the onsite medical team, to ensure that they are linked into the appropriate local medical / psychiatric services.

Following any incident, Migrant Help's Outreach Team will also contact the client via a welfare call to advise of additional support services that might be helpful to them.

- e) How MH ensure its staff are aware of and can apply the Home Office's 'suitability criteria' for identifying residents too vulnerable to be accommodated at the site.**

Migrant Help's role starts prior to the client being moved to Napier barracks. The person seeking asylum will have been through the Initial Accommodation services and have had an induction briefing. Their Asylum Support Form (ASF) would have been completed by then, which identify any specific vulnerabilities. Migrant Help's understanding is that clients should only be placed at Napier once they have been assessed as eligible for support.

When completing the ASF form each asylum seeker is asked the following, in addition to vulnerability questions: *“In making decisions about the allocation of asylum support accommodation, the Home Office has regard to the specific situation of vulnerable persons such as minors, unaccompanied minors, disabled people, elderly people, pregnant women, single parents with minor children and persons who have been subjected to torture, rape, or other serious forms of psychological, physical or sexual violence. Do any of these apply to you?”*

If additional vulnerabilities come to light after the ASF completion and prior to dispersal, Migrant Help will send the relevant evidence to the Home Office for consideration when appropriate dispersal accommodation is assessed.

If, after client has been housed at Napier, there is disclosure of information or a change of circumstances that means that it is no longer suitable for the client to be accommodated on site, we would raise a Change of Circumstances (COC) request to move and ensure priority submission. We would also notify the Accommodation Provider and Safeguarding teams of any concerns. We would also signpost / refer the vulnerable client to specialist support agencies where required.

**f) What training MH’s on site staff receive on safeguarding, and when this training was introduced.**

All staff receive Adult and Child Safeguarding training, delivered via our bespoke eLearning platform, as part of their initial induction process when they are first employed by Migrant Help. Following the completion of the probationary period, our advisers undergo a more in-depth SAFEcic course, which is refreshed every 12 months. In addition, and more recently, we have been working with Ann Craft Trust on bespoke safeguarding sessions. All advisers working as part of the AIRE contract are also trained in the following areas, which form part of their initial induction:

- Health and Safety
- Safeguarding Adults and Children
- Modern Slavery
- Equality and Diversity
- Awareness of Radicalisation (PREVENT)
- Cultural Awareness
- Gender based violence awareness

**g) What training MH’s on site staff receive on working with asylum seekers and victims of trafficking, and when this was introduced.**

All Migrant Help frontline staff receive training on Asylum and Asylum Support Overview, Modern Day Slavery and OISC Adviser training, all contained on our eLearning platform.

### **3. Legal needs**

Please confirm / explain:

- a) **What MH is doing to ensure residents are aware of the importance of accessing appropriate legal advice and representation. We should be grateful for copies of any relevant written documents, and confirmation of what languages these are provided in.**

All asylum seekers housed at Napier receive Migrant Help induction upon arrival, during which we explain the importance of obtaining legal advice and a legal representative. We can also signpost to legal services if requested. This is done by providing details of three different solicitors to ensure impartiality and a choice of provision for the client. Historically, we would have provided details of local services, but since Covid most legal services are now offering a remote service.

Please note that we use interpreters for the Migrant Help induction and any other formal appointments and interactions with our clients. This is either by using a bilingual member of the team or, in most cases, using Clear Voice interpreting services.

When both Napier and Penally were first commissioned, we worked with the Legal Aid Agency who scoped out a number of legal services that were willing to support people on site and provide a remote service. We then produced posters, detailing these services and stressing the importance of engaging legal advice as early as possible in the process. We have recently revised the poster, with the support of the Legal Aid Agency, and refreshed the list of available services to ensure it is current and up to date with details of the legal advisers that have the capacity to take on new clients.

We also provide information about the asylum process in 11 most used languages on our website: <https://www.migranthelpuk.org/advice-and-guidance>. All asylum seeking clients are provided with a hard copy of the asylum advice booklet.

- b) **What MH is doing to facilitate residents' access to such advice and representation, including any work with external organisations.**

Please see the details of our collaboration with the Legal Aid Agency above.

In addition to this, an external organisation that has been given permission to operate on site by UKVI (Care for Calais) provides a drop-in service at Napier to provide more in-depth support with around legal provision. They can support clients in contacting legal services and making an appointment with a legal representative.

- c) **Whether residents have access to MH's telephone helpline, what the average waiting time for calls to be answered is, and what plans MH has to reduce this time, if needed.**

Our asylum seeking clients have full access to all Migrant Help services, including the 24/7 free telephone helpline, webchat, Raise an Issue and Self Service portal.

The average call waiting time for the helpline in August was 13 minutes. We accept that this is too long and are working hard to reduce the time by increasing headcount and addressing staff attrition and retention levels.

We are supporting our telephone advisers to ensure that they can provide the best possible service to our clients, while being aware of the expectations for their performance in both number of calls answered and average handling time.

A refresher call handling training has been given to all staff and will be provided in all initial inductions. This training provides hints and tips on how to start and end a call, how to remain in control and how to regain control of the call where needed.

Our advisers deal with some very distressing calls and their wellbeing is always a priority for the organisation. In the past couple of year, we focused on training such as Resilience, Vicarious Trauma and Burnout. We also trained a group of Mental Health First Aiders to build an internal support mechanism for staff.

- d) **What MH is doing in relation to residents who receive their asylum substantive interview on site, including any information and support provided regarding legal and mental health needs.**

Migrant Help is provided with a list of asylum seekers who are due to have an appointment on site by the UKVI. We then contact the relevant clients to ensure they are aware of the proposed interview date and check that they have a legal representative in place to support them. If they do not, we will assist them to engage the services of a legal firm ahead of the interview. This information is also fed back to UKVI.

If any issues or concerns are identified that could be a barrier to the interview taking place, we inform the Home Office accordingly. However, it should be noted that we do not have the authority to stop an interview, this is a decision for the Home Office.

If a client discloses any mental health concerns or displays poor mental health when we interact with them, we complete an Incident Report to notify the Accommodation Provider and the Home Office. We also gain the client's consent to notify the on-site health team and request assistance for them.

- e) **What MH is doing in relation to residents who receive a Notice of Intent under the Inadmissibility Rules, including any information and support provided regarding legal and mental health needs.**

Migrant Help is not made aware of decisions relating to immigration status. We would not be notified if someone were served a notice of intent. We would expect the client's legal representatives to provide the relevant information.

#### **4. Health needs**

Please confirm / explain:

- a) What MH is doing to ensure residents are aware of, and can access, healthcare services.

This falls within the remit of the Accommodation Provider's induction. This should be conducted with all new arrivals and give an orientation to the site and how to access the on-site health provision. This should also include key health and safety information, fire safety instructions, meal times, length of stay, etc.

In addition to this, Migrant Help also delivers an induction for those new to the site, which reinforces the key messages and sets out what people can expect, how to access the services, what activities are ongoing and how they can get involved.

In case of clients who have been granted S95 support, we will liaise with the Home Office to ensure that they receive their HC2 from the NHS Business Pricing Authority. Local arrangements are in place to ensure that clients can access free prescriptions until the HC2 form has been issued.

#### **5. Communication and engagement**

Please confirm / explain:

- a) What professional interpreter and translation services are available for residents accessing MH services.

Migrant Help is very lucky to have many bilingual advisers who are able to communicate with clients in their own language. Where this is not possible, we use Clear Voice interpreting service, a social enterprise that offers instant telephone interpreting in more than 200 languages. In the unlikely event that Clear Voice interpreters are not available, we have arrangements in place with an alternative provider, Language Line, to ensure speedy communication.

In short, we are always able to provide interpreting to our clients when needed.

- b) Whether MH staff use residents to provide interpreter/translation services, and if so what plans it has to end this practice.

Migrant Help would never use other residents for formal appointments, these are always conducted with our own staff or qualified interpreters.

It is possible, in informal settings, that a friend may ask a question on client's behalf and act as a go-between. In this case, we might engage with them if consent has been given. However, we would offer a formal appointment and use an interpreter depending on the nature of the discussion.

**c) What support MH provides to residents to raise complaints or submit feedback about the site or their experience of the asylum process more generally.**

Migrant Help, under the provisions of the AIRE contract, assists clients directly to report complaints and feedback. Asylum seekers can report such matters in a variety of ways:

- Approaching the Migrant Help on site staff
- Calling the advice line open 24/7/365
- Using our webchat
- Using 'Raise an Issue' on our website

We take full details, raise the complaint or feedback on our ELLIS database and allocate it to the appropriate party to investigate. E.g., for matters relating to the quality of accommodation, or food provision, it is referred to the Accommodation Provider. If an asylum seeker requested a relocation due to a change of circumstances, then we would refer the matter to the Home Office.

We explain the timescales for a response to the clients (usually 5 days) and always stress that they are not jeopardising their asylum claim by making a complaint, as is often their concern. Any feedback provided would be fed into our internal quality framework to support with continuous improvement.

**d) What processes are in place for residents to raise complaints or submit feedback about MH.**

As detailed above, the same process would apply.

**e) What processes are in place for external organisations and individuals to raise complaints or submit feedback about MH.**

Our complaints process covers the Accommodation Providers, the Home Office, the payment provider and Migrant Help. Complaints regarding any of these can be logged through our complaints and feedback processes as outlined above.

If a third-party agency has consent from an individual, then Migrant Help can assist them with raising complaints as per the process above.

If a general complaint is being raised by a third party, then this would need to be addressed to the relevant party directly, i.e., the Home Office, Accommodation Provider, etc. Under the AIRE contract, we have to record complaints against a specific client's file and, therefore, are unable to process general complaints in the same way.

## **6. Other information**

If there is any other information about MH's work at Napier Barracks that you feel it would be useful for the inquiry to know, please do share this.