



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

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

#### **Questions for Migrant Help**

#### **Question regarding Penally Camp**

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

Please confirm / explain:

- a) What services Migrant Help (MH) provided in relation to Penally Camp, both on site and remotely.

Migrant Help has ensured that we had a presence on site at Penally 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. We had two Community Support Workers based at Penally, with at least one of them on site Monday to Friday. 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.

Our Community Support Workers acted as a consistent point of contact on site for the clients, building their trust and signposting to appropriate services and activities. They took part in regular meetings with the client leads on site and advised them on what we could do to help with the issues raised.

They also worked closely with the Accommodation Provider and local groups on site to help bring additional services to Penally to benefit the clients. An example of this work was the gym which was set up as a result of the collaborative effort between our Community Support Workers, Accommodation Providers and kind donations from third sector organisations.

We would regularly liaise with the health team to refer people for appointments and supported with promoting the initial health assessment offered to the clients.

We also ensure that clients were aware of the importance of gaining legal advice and provided signposting to firms who confirmed they had capacity and offered legal aid.

In addition to engaging with the staff on site, the clients accommodated at Penally could 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 were present on site, their responsibilities, level of experience and what form of supervision was provided.**

We had one Community Support Worker on site between Monday to Friday. They worked with the Accommodation Provider, including the on-site security team ensuring the residents were aware of any risks and how to stay safe, as well as other on-site organisations.

Our Community Support Workers were line managed by the Head of Specialised Services, and also supported by the Outreach Manager and Deputy Director of Asylum Services. We went through an induction process with our Community Support Workers and completed our core training remotely, which included:

- Health and Safety
- Safeguarding Adults and Children
- Modern Slavery
- Harassment and Bullying
- Equality and Diversity
- Prevent against radicalization
- General data protection
- Dealing with Extremism and Terrorism
- Gender based violence
- Cultural awareness

After the core training was completed, the CSWs received system training and an induction to the site including building relationships with all key stakeholders. They were briefed on our risk assessment and method statement for carrying out services at Penally on site.

Our Community Support Workers were then closely supported by the Head of Specialised Services, received regular one to ones, and we also conducted regular group meetings with them.

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

Please confirm / explain:

- a) How the weekly welfare check of residents provided by MH was carried out, including how and to whom any safeguarding concerns were

raised. We would be grateful if you could provide 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 had in place in relation to residents who were 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 were followed in the event that a resident disclosed they were a child, or MH staff had reason to suspect this. We would be grateful if you could provide copies of any relevant written documents.

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 were followed in the event of a resident experiencing a psychiatric emergency (e.g. a self-harm or suicide

attempt). We would be grateful if you could provide copies of any relevant written documents.

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

Our Community Support Workers at Penally worked closely with the Health Board, who initially set up services on site but then moved to a robust off-site provision with a dedicated lead nurse and referred anyone who was unwell.

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 ensured staff were aware of and could apply the Home Office's 'suitability criteria' for identifying residents too vulnerable to be accommodated at the site.**

Migrant Help's role started prior to the client being moved to Penally 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 identified any specific vulnerabilities. Migrant Help's understanding was that clients should only be placed at Penally once they have been assessed as eligible for support.

When completing the ASF form each asylum seeker was 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 came to light after the ASF completion and prior to dispersal, Migrant Help would send the relevant evidence to the Home Office for consideration when appropriate dispersal accommodation was assessed.

If, after client has been housed at Penally, there was 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 on site staff on site received on safeguarding, and when this training was introduced.

All staff received 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 on site staff received 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 did to ensure residents were aware of the importance of accessing appropriate legal advice and representation. We would be grateful if you could provide copies of any relevant written documents, and confirm what languages these were provided in.

All asylum seekers housed at Penally received Migrant Help induction upon arrival, during which we explained the importance of obtaining legal advice and a legal representative. We could also signpost to legal services if requested. This was 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 revised the poster while Penally was in operation, with the support of the Legal Aid Agency, and refreshed the list of available services to ensure it was current and up to date with details of the legal advisers that had 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 did 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 the above, an external organisation, that has been given permission to operate on site by UKVI (Welsh Refugee Council), provided drop-in sessions at Penally to provide more in-depth support around legal provision. They could support clients in contacting legal services and making an appointment with a legal representative.

**c) Whether residents had access to MH's telephone helpline, what the average waiting time for calls to be answered was, and what steps MH took 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.

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

Please confirm / explain:

- a) What MH did to ensure residents are aware of, and could access, healthcare services.

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

In addition to this, Migrant Help also delivered an induction for those new to the site, which reinforced the key messages and set out what people could expect, how to access the services, what activities were ongoing and how they could get involved.

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

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

Please confirm / explain:

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

Migrant Help is very lucky to have many bilingual advisers who were able to communicate with clients in their own language. Where this was not possible, we used 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 were not available, we had arrangements in place with an alternative provider, Language Line, to ensure speedy communication.

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

**b) Whether MH staff used residents to provide interpreter/translation services, and if so what if any steps it took to end this practice.**

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

It is possible, in informal settings, that a friend may have asked a question on client's behalf and act as a go-between. In this case, we might have engaged 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 provided 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, assisted clients directly to report complaints and feedback. Asylum seekers could 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 took full details, raised the complaint or feedback on our ELLIS database and allocated it to the appropriate party to investigate. E.g., for matters relating to the quality of accommodation, or food provision, it was referred to the Accommodation Provider. If an asylum seeker requested a relocation due to a change of circumstances, then we would have referred the matter to the Home Office.

We explained the timescales for a response to the clients (usually 5 days) and always stressed that they are not jeopardising their asylum claim by making a complaint, as was often their concern.

Any feedback provided was also be fed into our internal quality framework to support with continuous improvement.

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

As detailed above, the same process would apply.

e) What processes were 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 Penally Camp that you feel it would be useful for the inquiry to know, please do share this.