

	Concern Addressed By	HMIP Concern	Home Office Response to HMIP Concern Including Action Already Taken / Proposed to Address Concern
1	Home Office	<p>Priority concern</p> <p>The recorded length of detention in all facilities was too long. In October 2022 the average was more than six days, and in recent months many children had been held beyond the 24-hour limit.</p>	<p>Published Home Office detention policy is clear that any detention must be for as short a period as possible.</p> <p>Detention is reviewed in line with detention policy and the Short-Term Holding Facility Rules 2018, which allow for extensions to the 24hr period for detention in a ‘holding room’ in exceptional circumstances.</p> <p>Short-term Holding Facility (Amendment) Rules 2022 were laid before Parliament on 15 December 2022 by means of a negative Statutory Instrument (SI) and came into force on 5 January 2023, allowing for detention in a ‘residential holding room’ for up to 96 hours (also subject to extension in exceptional circumstances). However, HO accepts that, especially in periods of high intake, persons have remained detained at Manston for longer than appropriate.</p> <p>Underpinning the success of the operation as a 24hr Processing Centre is the ability to move persons away from the site to a variety of location types which is presently being explored by officials. The Home Office continues to engage collaboratively with contracted suppliers in ensuring HO facilities provide a safe and lawful operating environment throughout summer 2023 and beyond.</p>
2	Home Office & Service Providers	<p>Priority concern</p> <p>Governance of adult and child safeguarding was poor</p>	<p>A safeguarding forum is in the process of being established and will meet monthly with all key stakeholders from across the WJF/Manston operation to identify any issues or trends arising from safeguarding cases.</p> <p>Monthly meetings are also held with the Manston operational safeguarding lead with Kent Police to track and review referrals made to them and their agreed responses to PVOT/Sexual assault cases.</p> <p>In addition:</p> <p>WJF</p> <p><u>Action Taken</u> Safeguarding leads are now in place at WJF and oversee the collation of medical and disclosed vulnerability data and outcomes to refer to BF operational and safeguarding teams who conduct more detailed triage and assess appropriate onward movement. In addition, there is a structured approach to training, and awareness sessions have been delivered to both operational and contractual staff.</p> <p><u>Action Planned</u> The safeguarding team continue to work with partners (for example, A&P, Local Authority, accommodation providers) to ensure that roles and responsibilities are defined, and Standard Operating Procedures will be produced.</p> <p>Manston</p> <p><u>Action Taken</u> A Wellbeing & Safeguarding Manager has now been appointed at Manston by Care & Custody (C&C) to enhance the governance around adult and child safeguarding. Whilst appointed specifically for Manston, this role will offer support to KIU also, sharing best practice etc.</p>

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			<p><u>Action Planned</u></p> <p>A network of Safeguarding Champions will be established from existing Detention Custody Officers to support the Wellbeing & Safeguarding Manager. It is expected that this will be complete within 6-12 months. A rolling refresher package for Safeguarding champions will follow once the initial upskill package has been complete. This work will be assured by a dedicated Compliance Team, appointed to work in partnership with the Wellbeing & SG Manager and will be in place within 3-6 months.</p> <p>C&C are also working with another external agency, Red Umbrella, who are delivering Mental Health First Aid Training to DCOMs. This programme has already started, and although the training is aimed at C&C DCOMs, it will also enhance staff skills when they are interacting with residents.</p> <p>KIU</p> <p><u>Action Taken</u></p> <p>KIU has safeguarding social workers and independent social workers who provide safeguarding advice and support to KIU officers. NAIU officers also undertake safeguarding training and KIU actively review training to ensure its fit for purpose. KIU will also work closely with the Wellbeing and Safeguarding Manager at Manston to provide further support.</p>
3	Home Office	<p>Priority concern</p> <p>There were no accurate data on the use of force or separation from the general population, or of incidents of violence and non-compliance. There was also no evidence of adequate governance or scrutiny of incidents</p>	<p>Data</p> <p><u>Action Taken</u></p> <p>The Home Office continues to enhance its strategic approach to managing data and supporting the effective delivery of the Small Boats Operational Command. SBOC has recently appointed a dedicated senior data director and data lead to oversee the improvement of data. This will be enhanced by the development of a dedicated SBOC Data Cell to provide assurance oversight and increase data quality. The Home Office continues to build the structures and processes necessary to appropriately record, report and share data required to effectively manage the operational activity within SBOC. Guidance and training are available for staff who handle data in the course of their operational duties.</p> <p>Governance</p> <p><u>Action Taken</u></p> <p>Since the inspection structures are in place across all sites, including a newly formed Use of Force Committee, to ensure oversight of the use of force by staff and contractors at Manston and WJF. The first meeting was in March 2023 and included a workshop with contractors to ensure a consistent understanding regarding the use of force (UoF) as per Home Office/Border Force policy. ToRs are now in place for the UoF Committee. The HO has provided UoF process maps to all contractors who guard small boat arrivals in Manston, and produced a UoF Standard Operating Procedure to ensure everyone is applying the same process and aware of their responsibilities.</p> <p>Additionally, KIU have an existing reporting structure in place in which any use of force is reported to the operational standards and safety team. Furthermore, Detention Services Use of Force team quality assure all incidents of use of force involving</p>

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			accredited Detention Custody Officers from the Escorting supplier, MITIE C&C, including those at Manston. All UoF reports submitted from this supplier are scrutinised and, where required, are taken to a monthly UoF meeting for further discussion where camera footage, if relevant, will be viewed. All UoF incidents are logged and kept on an internal database by the UoF team.
4	Home Office	Priority concern Professional interpretation was not always used consistently. This applied to Home Office processing and to staff interactions with detainees.	<p><u>Action Taken</u></p> <p>The wider operation and processing system is well supported in terms of interpreting services which are provided for the most frequently encountered languages. Interpreting services are deployed where they are most needed both to maintain flow through the system to prevent unnecessary delay and for the most complex and nuanced interactions, for example where we might have safeguarding / vulnerability concerns (including age assessments), identifying complex medical issues, delivery of asylum screening interviews, and assistance on the encounter desk at Manston. Where required, there is provision for 40 individual interpreters with a minimum of 2 interpreters each for every one of the top-ten most frequently occurring languages encountered. In addition, there is a facility to request different languages on an ad-hoc basis.</p> <p>Routine interactions which involve simple exchanges between HO staff and migrant arrivals, and where interpretation is required, are delivered through a combination of app-based interpreting services (Big Word), Visual Display Units (VDUs) to convey important information, electronic interpretation tablets, language cards, and for family groups, any people within the group who can speak a reasonable level of English.</p> <p>For asylum screening interviews, interpreters are consistently used.</p> <p><u>Action Planned</u></p> <p>Most frequently encountered languages will be kept under review in line with language trends, as will the deployment of interpreting services throughout the process to ensure both flow and the provision of the full range language services to deal with unpredictable flows of migrant arrivals.</p> <p>C&C intend to look at how telephone interpretation could be improved at Manston, with the possible introduction of VOIP (internet) phones and handset splitters.</p> <p>In addition, the number of electronic translation devices is being increased, to supplement the use of telephone interpretation for more general engagement with residents. Staff will be reminded of the C&C Standard Operating Procedure on the use of interpretation services.</p>
5	Home Office	Key concern The facilities at Manston were adequate for short stays of 24 hours or less but were not suitable for longer periods of detention. During busy periods detainees had often been	<p><u>Action Taken</u></p> <p>The introduction, since the inspection, of the new Residential Holding Room (RHR) facilities on-site at Manston, provide the ability to detain persons in a residential setting for up to 96hrs in accordance with the Short-Term Holding Facility Rules 2018 (as amended).</p>

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		held for considerably longer in marquees in unacceptable conditions.	
6	Home Office & Service Providers	Key concern Care planning for vulnerable detainees, children and those with disabilities was poor and did not demonstrate individual planning, risk assessment or meaningful welfare checks.	<p><u>Action Taken</u> Individual care plans are put in place at WJF for those moved off site with ongoing medical concerns or where a person may have a disability. Those who would not be able to manage the move to Manston, or who would struggle being at Manston, are moved to a suitable hotel, where they are screened, and a referral is made for Local Authority/NHS to assess for support.</p> <p>For those who go to Manston, and where medical concerns and/or vulnerability is identified, Medevent will create a care plan and request priority screening and dispersal. Kent police attendance is also requested as appropriate. In cases where there are concerns that a resident may have suffered sexual assault, their consent is sought to refer them to Medevent and involve Kent Police. Where possible and appropriate for the resident, this will be expedited to fall within the forensic window Cases where historic sexual assault is suspected/alleged are also addressed empathetically and use of a proforma provided by Kent Police is due to commence ensuring that full and relevant information to enable an investigation is captured and the resident is given the best opportunity for redress and support. In addition, the C&C Wellbeing & Safeguarding Manager appointed at Manston and providing support at KIU, (referenced at priority concern 2), will also support with individual risk assessments and care plans. They will also attend set monthly meetings with senior HO leads to discuss all aspects of care planning and risk assessments. In terms of facilities:</p> <ul style="list-style-type: none"> • Several of the Manston marquees now have Disability Discrimination Act (DDA) compliant toilet facilities. • There are 10 x wheelchairs that are freely accessible for residents that may require them. • On-site Aeromed Medics have increased from 2 to 4 and Healthcare Assistants have been appointed. <p><u>Action Planned</u> The C&C Wellbeing & Safeguarding Manager will also develop Safeguarding Champions within the existing DCOM Team, it is expected that this will be complete within 6-12months. A rolling refresher package will follow once the initial upskill package has been completed.</p>
7	Home Office & Service Providers	Key concern There was limited evidence of engagement by staff with detainees to monitor their welfare or resolve concerns.	<p><u>Action Taken</u> All operations conducted at WJF and Manston are guided by five strategic objectives, one of which is to identify vulnerability and safeguarding concerns.</p> <p><u>Action Planned</u></p> <ul style="list-style-type: none"> • An awareness package is being delivered to upskill SBOC staff and contractors on engaging with individuals to identify and act on welfare concerns. • Process maps are also near completion which will guide SBOC staff on correct referral pathways/appropriate responder for various safeguarding concerns. • A safeguarding handbook is also being devised – this will guide staff through every safeguarding scenario and encompass everything from identifying concerns to final referral.

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			<ul style="list-style-type: none"> Dates have been pencilled in for July to commence Safeguarding Officer training – this is a 3 day course which is a BF requirement to become a recognised BF Safeguarding Officer. <p>In addition:</p> <p>WJF</p> <p><u>Action Taken</u></p> <p>Detailed guidance on identifying welfare and safeguarding concerns has been provided to both permanent HO staff and contractors operating at the WJF site.</p> <p>In addition, a migrant-centric workforce culture has been established amongst all teams operating at the site. This has been reinforced through bespoke training for small boats operations (the creation of the Small Boats Foundation Course) and, through direct supervision of ongoing operations by dedicated senior managers (BFHO and BFSOs) who are constantly ‘walking the floor’ to oversee activity and ensure all welfare/safeguarding issues are identified and dealt with correctly.</p> <p>In parallel, a learning needs analysis is also being conducted for all contracted staff with a view to aligning training standards for contractors in direct contact with arrivals with those of HO operational staff. This will include medical staff, Detention Custody Officers and security staff.</p> <p>Inside the Red Tent, the medical examination process now includes a full welfare/safeguarding questionnaire. This was rolled out following a successful trial in April 2023. Every arrival at WJF has an officer stationed in Red Tent to conduct safeguarding and welfare checks on all arrivals. Assurances are completed to ensure this is carried out.</p> <p><u>Action Planned</u></p> <p>Through the supervisory roles that have now been put in place and the newly established processes (inc the medical/welfare questionnaire), there will be regular monitoring meetings to ensure all welfare concerns have been correctly actioned/recorded.</p> <p>Manston</p> <p><u>Action Taken</u></p> <p>Detention contractors complete welfare checks every 3 hours escalating issues and concerns to caseworkers.</p> <p>Regular governance meetings with detention suppliers are in place and Home Office detention contract monitors are deployed on-site at Manston to ensure welfare checks are being completed.</p> <p>C&C have increased their Detainee Custody Officer Manager (DCOM) headcount at Manston from 20 to 40, specifically to monitor the welfare and safeguarding of residents, ensuring the correct level of engagement is taking place.</p> <p>Following the HMIP Inspection all staff attended a debrief, which included a section on positive engagement with residents, and how this could be strengthened.</p>

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			<p><u>Action Planned</u> Resident Welfare and Engagement will be added as a standing agenda item on the DCOM Strategy Days that occur monthly, as of June 2023.</p> <p>A new role of Operations Support Officer (OSO) has been introduced, these OSO's will carry out non-operational duties which will result in DCOs having more time to engage with residents in a meaningful manner.</p> <p>There are currently 10 electronic translation devices on site at Manston with another 40 devices on order, this will also improve effective communication and engagement between staff and residents.</p>
8	Home Office & Service Providers	<p>Key concern</p> <p>Processes for managing medical isolation at the Kent Intake Unit were inadequate and the facilities for medical isolation at Western Jet Foil were poor and not fit for purpose.</p>	<p>WJF</p> <p><u>Action Taken</u> There are two isolation units situated at WJF. The most recently installed isolation unit, fitted in May, has capacity for six people (or a family group) and come equipped with soft seating and windows. The second isolation unit is more limited and has been designated as overflow capacity only. This has seating for up to four individuals but does not have windows. Migrant arrivals will be placed in isolation units following identification of any communicable diseases either whilst onboard the recovering CTV or, following full medical and welfare checks being conducted immediately following disembarkation into the Red tent.</p> <p>KIU</p> <p><u>Action Taken</u> There is a dedicated isolation room that can be utilised for residents at KIU. Preliminary medical assessments are carried out at WJF but on arrival at KIU, the DCOs will carry out a full induction with every resident. Where necessary, there are Aeromed Medics on site to support this induction process and make further medical assessments as required. If it is identified that a resident needs to be isolated from other residents on medical grounds, then they will be asked to wait in the isolation room until an isolation taxi arrives to transport them to a bespoke hotel for residents who cannot mix with the general population.</p> <p><u>Action Planned</u> The Medical isolation room at KIU requires improvements so that when isolation is required it is not being used as a storage space.</p>
9	Home Office & Service Providers	<p>Key concern</p> <p>There were weaknesses in the maintenance of medical confidentiality. Inappropriate levels of information about detainees' medical</p>	<p><u>Action Taken</u> All staff have been briefed on the requirement to maintain medical confidentiality and ensure no unnecessary disclosure of personal medical information occurs. Each location now has a senior manager allocated to supervise the functioning of all processes. This includes oversight of processes to maintain medical confidentiality</p>

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		records were discussed among custody officers.	<p>C&C recognise that more needs to be done to safeguard medical information relating to residents. To address this, document holders have been sourced to carry medical documents, ensuring that unauthorised personnel do not have sight of this confidential information. These will on site and in use by early June 2023.</p> <p><u>Action Planned</u> Work is currently underway to prepare for digitisation of medical records which will provide further safeguards for medical confidentiality using the EMIS tool. EMIS is a digital tool used by clinicians for medical notetaking. It forms a network with other clinicians nationally and can be used to pass on medical notes – simplifying the transfer of case notes. This will help Medevent (health care provider at Manston) and also initial medical screening at WJF.</p> <p>Mitie C&C: A Notice to Staff (NTS) and a Toolbox Talk (TBT) will be drafted and issued to all staff to raise awareness of resident confidentiality, particularly around any medical information. This check will also be added to the Internal Audit Baseline Templates to ensure continuous monitoring.</p>
10	Home Office & Service Providers	Key concern Detainees had limited access to any form of communication with the outside world at all sites, including contacting their families after their journeys.	<p>WJF</p> <p><u>Action Taken</u> WJF is currently operating as a SOLAS - reception facility focussed on rescuing then disembarking migrant arrivals safely and quickly. The purpose of the process once migrant arrivals have been disembarked is to identify health, wellbeing and safeguarding issues prior to conducting border security and immigration checks. There is no opportunity to introduce this practice at the SOLAS-reception stage as it would delay/hinder the necessarily rapid medical triage and safeguarding process immediately following disembarkation.</p> <p>Manston</p> <p><u>Action Taken</u> Each holding room and RHR facility has <i>free to use</i> phones for residents to telephone families and/or legal representatives. There are currently 2 x SIM Free phones and 2 x fixed landline phones for resident use in each marquee at Manston. There are additional back up mobile phones available to be utilised during busy periods. Staff have been briefed on the additional stock since the HMIP Inspection.</p> <p>Additionally, a pack of periodicals & magazines is received each month in a variety of languages to suit the profile of residents coming into the facilities. There is also a TV in each holding room for residents to access daily news channels when required.</p> <p><u>Action Planned</u> 2 x Acoustic booths have been erected in each marquee, and the landline phones will be repositioned inside to maximise privacy for residents and provide greater visibility of this service. This is expected to be completed by early July 2023.</p>

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			<p>KIU</p> <p><u>Action Taken</u> There is a known problem with the mobile phone signal at the new KIU accommodation. Residents are able to use the 4 x fixed landline phones, whilst other potential solutions are explored.</p>
11	Home Office & Service Providers	<p>Key concern</p> <p>Detainees were not made aware before leaving of where they were going and what would happen next.</p>	<p><u>Action Taken</u> Currently, all migrant arrivals leaving Manston are informed about their destination prior to being discharged.</p> <p>In the case of those bailed to hotels, they will be informed verbally and in writing on their bail paperwork.</p> <p>In the case of those being placed in immigration detention (IRCs), this is done verbally.</p> <p>Maps showing the location of Immigration Removal Centres (IRC) are displayed at Manston and will shortly be introduced at KIU.</p> <p>IRC Information Cards are provided to residents who transfer to a further place of detention, who will be briefed on their destination and journey time.</p> <p><u>Action Planned</u> It is accepted that more can be done to inform of next steps in accessible formats, and NAIU are exploring options in collaboration with SBOC.</p>