

TITLE	Gatwick Immigration removal centre Safeguarding adults and children – incorporating Modern slavery, torture, trafficking and PREVENT.
Author and Date	Nicola Hunter and Sandra Calver 9 th November 2021
Background and Purpose	<p>The Care Act 2014 states any adult at risk of abuse or neglect should be able to access appropriate interventions which enable them to live life free from violence and abuse.</p> <p>Practice Plus Group believes that every individual has a right to:</p> <ul style="list-style-type: none"> • Live their lives free from violence and abuse • Be protected from harm and exploitation • Independence, which involves a degree of risk <p>Such rights are underpinned by the principles identified within Human Rights Act 1998. For the specific purposes of this local process it is important to reference article 3 and 4 of the human rights act specifically.</p> <p>Article 3 states of the human rights act 1998 refers specifically to the right to life without torture or degrading treatment or punishment.</p> <p>Article 4 refers specifically to the prohibition of slavery, forced labour or servitude.</p> <p>Immigration removal centres are responsible for the care and welfare of a vulnerable and marginalised cohort of people and, as such, robust and clear safeguarding processes are required.</p> <p>The purpose of this local process is to ensure that the healthcare team are aware of roles and responsibilities as healthcare professionals and that the processes which are in place and clear and allow staff to meet their duty of care in terms of Safeguarding.</p> <p>Adult and children safeguarding within the health in justice context means keeping people safe and protecting them from abuse and neglect and there are a number of processes in place to ensure this duty is met. These also ensure that people who are unable to protect themselves as a result of care and support needs are provided with a level of protection that is equivalent to that provided in the community.</p>
Relevant documents for reference e.g. National Guidance, Care UK policies	<p>The Care Act (2014) The Mental Capacity Act 2005 The Human Rights Act 1998 The Modern Slavery Act 2015</p> <p>PPG Policy - Safeguarding Adults (2021) Safeguarding Children (2021)</p>

	<p>Prevent (2021)</p> <p>DSO – Management of adults at risk 08/2016</p> <p>DSO – Safeguarding children 19/2012 (updated 09/2019)</p> <p>DSO – Mental Vulnerability in immigration 04/2020</p> <p>DSO – Deaths in detention 08/2014 (updated 07/21)</p> <p>DSO - Detained individuals who refuse to eat or drink 03/2017</p> <p>DSO - Detention Rule 35 process 09/2016</p> <p>DSO - Extremism and radicalisation 01/2015 (updated 04/2019)</p> <p>DSO - Lesbian, gay and bisexual detainees 02/2016</p> <p>DSO - Mental vulnerability and immigration detention 04/2020</p> <p>DSO - Pregnant women in detention 05/2016</p> <p>DSO - Caring for and managing transsexual detainees 02/2012</p> <p>DSO - Whistleblowing and the Public Interest Disclosure Act 1998 (c.23) 03/2020</p> <p>https://www.westsussex.gov.uk/social-care-and-health/social-care-support/adults/raise-a-concern-about-an-adult/#information-for-professionals</p> <p>***DSO refers to Detention Services Orders as set out by the Home Office***</p>
Principles	<p>Safeguarding of vulnerable adults and children in secure settings and in the wider community is a shared responsibility with the centre operator, for Gatwick IRC this is Serco. Prevent is also a common priority and it is recognised that people may be at increased risk of radicalisation when they are vulnerable.</p> <p>Clear processes should describe how to escalate concerns and make referrals to the partnership and also to the local authority where appropriate.</p> <p>Information sharing is key to safeguarding vulnerable adults & children and attempts to gain consent should be documented with clear processes for escalation where consent is declined (cross reference information sharing LOP)</p> <p>Processes for monitoring and reviewing safeguarding issues should include reporting on Datix and formulation of safeguarding specific data for review at local quality and partnership boards.</p> <p>Completion of the Health in Justice Safeguarding assurance framework is mandatory in line with the wider audit schedule.</p> <p>Staff should be adequately trained to recognise and report safeguarding concerns and processes need to be in place to provide assurance of this, including completion of on-line mandatory training. Practice plus group training sits in line with the Safeguarding adults and children's intercollegiate documents and all staff will remain compliant with training requirements.</p> <p>The site should have a designated Safeguarding and Prevent lead - the Safeguarding and Prevent Lead for Gatwick Immigration removal Centre is Sandra Calver – Head of Healthcare, who is level 4 safeguarding trained.</p>
Local arrangements	<p>The referral process</p> <p>When a Safeguarding concern is identified a referral will be made verbally to the Safeguarding team based on site at Gatwick IRC, this will then be followed up with</p>

	<p>a written concern via email. The Patient will then be placed on the adults at risk log to ensure follow up within the centre.</p> <p>All Safeguarding concerns will be discussed weekly at the adults at risk multi-professional meeting and regular updates will be requested by healthcare from the site Safeguarding team. Safeguarding concerns relating to a family or child/children will be discussed as part of the daily multi-professional telephone conferences which take place when a family or children are staying within the centre.</p> <p>Medical hold will be considered as part of the keep safe plan for the patient if appropriate.</p> <p>The Safeguarding Lead for PPG will be informed of the concern and will be contacted for support as required.</p> <p>The Local Authority Referrals to the Local authority safeguarding team will be considered on a case by case basis however there are specific concerns which will prompt a mandatory referral directly from the healthcare team to the local authority:</p> <ul style="list-style-type: none"> • Unsafe discharges or discharges in to the community of vulnerable people who require support • FGM • Modern slavery / human trafficking disclosures • Disclosures or torture • Child neglect or abuse (even if suspected and not confirmed) • Enforced food and fluid refusal of a child • Mental Capacity or best interest concerns • Mental health act concerns • Lone children • Expectant Mothers / unborn child <p>The referral itself, if not urgent, will be completed via the West Sussex safeguarding adults or children website online portal. Once the referral has been completed a reference number will be generated and this should be documented clearly within the Patients clinical notes to allow appropriate follow up from the healthcare team.</p> <p>note: this is not an exhaustive list and, as mentioned above, each case will be considered on its individual merit</p> <p>Urgent or out of hours referral Any Safeguarding concerns noted or disclosed out of hours or which require urgent review will be discussed with the on call Manager in the first instance. Urgent referrals to the local authority should be made via telephone number 0330 2228400. As with any referral this should be clearly documented within the Patients clinical notes along with any reference number which may be given.</p> <p>Expectant Mothers Any woman noted or found to be pregnant during a stay at Gatwick Immigration</p>
--	--

	<p>removal centre will be referral to the site Safeguarding adult's team, a referral will also be completed to the safeguarding children's team within the local authority for the unborn child.</p> <p>Underage age patients / children The Law within the UK defines a child as a person under the age of 18 years old. For those coming in to the unit alone and under age a referral to the safeguarding children's team will be completed.</p> <p>Incident reporting and Datix All Safeguarding referrals will prompt the completion of a Datix incident from outlining the nature of the concern raised and action taken. These incident reports will form part of regular data scrutiny and discussed with NHS England as and Serco as part of the working partnership.</p> <p>Safeguarding boards interface – Adults and Children Links exist between the healthcare team at Gatwick IRC and the safeguarding adults and children teams within the local authority. This will form the basis of the relationship between the healthcare team and the local safeguarding boards and a method of information sharing. Specific request for information from the board will be put to the Head of healthcare in the first instance via the safeguarding team within the local authority. Similarly request to the board will be put to the safeguarding teams by the head of healthcare.</p> <p>It is not anticipated that a representative from site will attend Safeguarding adults or children's boards as routine unless there is specific indication that it is required or would be beneficial.</p> <p>Audit The Safeguarding framework will be completed quarterly as part of the PPG audit schedule and this will include overview of all referrals made.</p> <p>MPCCC Safeguarding will be a standing agenda item at site MPCCC and all safeguarding referrals or concerns will be discussed to ensure multi-professional input is gained.</p>
Review Date	November 2023