



Home Office

**The Home Office response to the Independent Chief Inspector of Borders and Immigration's report:**

**An inspection of the Home Office's approach to the identification and safeguarding of vulnerable adults**

**February – May 2018**

## **The Home Office thanks the Independent Chief Inspector of Borders and Immigration for his report.**

The Independent Chief Inspector of Borders and Immigration (ICIBI) recognised that the department has made some progress in the management of vulnerable adults, in particular:

- Recognising the effort that the Border, Immigration and Citizenship System (BICS) is targeting at vulnerability issues to improve training, raise awareness and capture information in a very challenging policy and operational area. The report makes clear that the inspectors were in no doubt that the BICS Board and senior management is serious in its intention to improve the protection it provides to vulnerable people.
- Acknowledging that child safeguarding practices are now firmly embedded across BICS with frontline staff making effort to provide support where they identify that it is needed.
- Emphasising the professional behaviours exhibited by the Immigration Enforcement and Compliance (ICE) team during a series of visits which were observed by the inspection team and acknowledging their observations that frontline IE teams were well organised, professional and motivated to do a good job, treating everyone they encountered with respect and care for their welfare.

The report made clear reference to the complexity involved in the management of vulnerability, both within the Borders, Immigration and Citizenship System but also within other public bodies such social services, the NHS and the police.

The Department is already striving to make significant changes to the identification, management and referral of vulnerable adults, working alongside our key strategic migration partners to support the most vulnerable customers. We welcome the ICIBI support for this ongoing activity and the increased momentum afforded through delivery of the recommendations.

This report also highlights areas where the ICIBI believes improvement could be made – some of which are already in progress. The Home Office has accepted all of the recommendations.

### **The Home Office response to the recommendations:**

**1. Review the progress made since the presentation on vulnerability and safeguarding to the BICS Board in May 2017, and update the BICS Board and then the Home Office Board (ExCo) before the end of 2018, producing a detailed Programme Plan that covers:**

1.1 Accepted

**a. what work has been completed in relation to vulnerability and safeguarding and what is**

## **underway across BICS (with owners, deadlines and deliverables)**

1.1.1 The department will continue to review progress against the plan initially discussed with the BICS board in May 2017 and commits to providing an update and full programme plan to the BICS board and ExCo before the end of 2018.

## **b. how this work is being co-ordinated and communicated across BICS and, where appropriate, the wider Home Office**

1.1.2 We commit to including a full communication plan in the update to the relevant departmental governance boards.

## **c. whether the cross-BICS lead on vulnerability and working group are adequately resourced and have the authority to deliver the required outcomes at the right pace**

1.1.3 The Department accepts the need to review the resource and authority of the cross-BICS working group. Work is ongoing in line with the 2019 Spending Review to outline requirements in this area.

## **d. the obstacles and solutions to establishing**

### **(i) common descriptions and definitions (with examples) of the vulnerabilities that BICS staff may encounter**

1.1.4 Work is already ongoing to identify a consistent definition of vulnerability and support the development of shared guidance for all BICS staff. The Department will continue to develop these descriptions and definitions alongside our key strategic partners. We have already initiated a discussion with the National Asylum Stakeholder Forum (NASF) Equalities and NASF Detention sub groups to seek stakeholder feedback on the indicators and suggested mitigation.

### **(ii) BICS-wide policies and shared or complementary processes and practices for responding to vulnerable individuals**

1.1.5 Under the “Simplification Programme” work is being undertaken to systematically map and assess all guidance for caseworkers in the BICS. One of the outputs of this work will be to identify thematic policy areas that cut across several different pieces of guidance, such as vulnerability. Where thematic areas have established guidance, it is the role of the programme to ensure a consistent approach is adopted.

### **(iii) consistent, quality-assured record keeping (including an overhaul of the use of “Special Conditions” flags)**

1.1.6 The Department is currently engaged in a significant overhaul to upgrade and improve the Case Information Database (CID) technology. The Department believes that there are many opportunities afforded by the new Atlas caseworking system to instil consistency, mandate information capture and record the history of a vulnerable

individual. We agree that we need to improve the consistency and quality of record keeping in relation to vulnerability and propose to do that using the new technology alongside making changes to the current system. Prior to the new technology being implemented, we are undertaking a review of “special conditions flags” to improve consistency and quality of record keeping across the BICS.

1.1.7 We do recognise however that investment in new technology cannot be the only solution to the improvement of record keeping, but must be supported by improvements in training, guidance and process. We will continue to embed improvements in this area and work closely with the IT providers to ensure any delay to delivery of the new system which would impact on our record keeping ability is mitigated by further improvements to the current “special conditions” process.

## **2. Reach out to Adult Social Services, the police, the NHS, and any other agencies with direct experience of identifying and responding to vulnerable individuals, including relevant NGOs, with a view to:**

2.1 Accepted.

### **a. distilling “best practice” in terms of the identification of and response to vulnerable adults, and using this to focus and accelerate the BICS programme of work**

2.1.1 The Department has good connections with local authorities, strategic migration partnerships and NGOs and engages regularly through stakeholder forums. We will continue to use these opportunities to identify and catalogue best practice for inclusion in the BICS work and ensure that we are signposting vulnerable individuals to the appropriate statutory body. Alongside this we are already seeking new ways to engage our key partners, for example by providing improved access into the BICS via a dedicated 24-hour contact point for local authorities; ongoing outreach programmes to the Association of Adult and Children’s services; and encouraging stakeholders to support us in the development of training packages and awareness sessions.

### **b. ensuring BICS staff have ready access to expertise and support, including clear ‘hand off’ arrangements to other agencies that are locally agreed, where necessary, but are underpinned by national strategies and framework agreements.**

2.1.2 The Department agrees that access to expertise, support and arrangements will support the overall provision of care for vulnerable adults within the BICS. We have already developed a network of vulnerability advisors, champions and officers across Border Force, UK Visas and Immigration and Immigration Enforcement and are continuing to support those structures through development of consistent training, guidance and processes for application across the BICS. Whilst the Department cannot be responsible for the provision of additional support from external organisations, we will ensure that our BICS strategies and frameworks are developed using expertise from those organisations.

**3. Spell out for BICS staff, in practical terms (with examples) as well as in law, what their ‘duty of care’ is to the people they encounter, where it starts and ends, and ensure that this is clearly stated in vulnerability and safeguarding guidance and training packages, and that the latter include sufficient classroom elements and expert input to give staff the confidence to deal as “first responders” with the range of vulnerabilities they may encounter.**

3.1 Accepted.

3.1.1 A programme of work is already underway across BICS to align training and guidance for staff of the different directorates. The intention is that training and guidance on recognising and responding to vulnerabilities will be developed in a standardised format throughout the BICS to ensure an effective and consistent approach.

3.1.2 A ‘Protecting the Vulnerable’ module is now part of all core skills courses for new Border Force officers, including the temporary seasonal workforce. This training module has been reviewed by the Office of the Children’s Champion and recognised as suitable for staff across BICS. We will now look to tailor the session appropriately for different parts of the business with input from professional training developers and external experts to create a shared, cross-BICS training package.

**4 Ensure that the Border Force, UKVI, Immigration Enforcement risk registers are fully aligned with regard to the goal of “Protecting Vulnerable People and Communities” (in practice, the risk of non-delivery is held at departmental rather than directorate level), and that the mitigating actions are designed to reduce the risk from “Red”.**

4.1 Accepted.

4.1.1 There is a periodic review of command risk registers to identify risks that could be system wide or have impact on other parts of the system. Work is ongoing to achieve consistency on the definitions and actions associated with risks within the vulnerability sphere.