



Immigration
Enforcement

Vulnerability Strategy

September 2018

Introduction and Strategic Vision

Immigration Enforcement's (IE) role is to **reduce the size of the illegal population and the harm it causes**. A key element of our vision for how we perform that role is to ensure we fully meet our responsibilities to **protect vulnerable people, children and communities**.

Focus on Safeguarding

There is a considerable range of contexts in which IE will encounter or come into contact with vulnerable adults and children. For some their contact may happen on only one occasion, but for others there may be multiple touch points, over a significant period of time, involving a range of different circumstances.

Making sure we have the right support in place for vulnerable people can be a complex landscape, often requiring multi-agency co-operation and engagement.

We recognise many have faced exploitation by traffickers, forced into modern day slavery or experience ongoing distress. For others vulnerability may be a number of personal and situational factors, such as physical or mental health, issues, homelessness or being a victim of crime.

We must be equipped to identify and take effective, early, appropriate safeguarding action.

Within our investigative and enforcement role, we must be vigilant to the needs of vulnerable adults and children, understanding the impact of our actions.

The definition of 'vulnerability' for Immigration Enforcement:
"A person may be considered vulnerable if their current personal and environmental circumstances give rise to an increased risk of harm or poor physical, psychological or social health, which requires IE to safeguard or mitigate the risk to the individual or others."

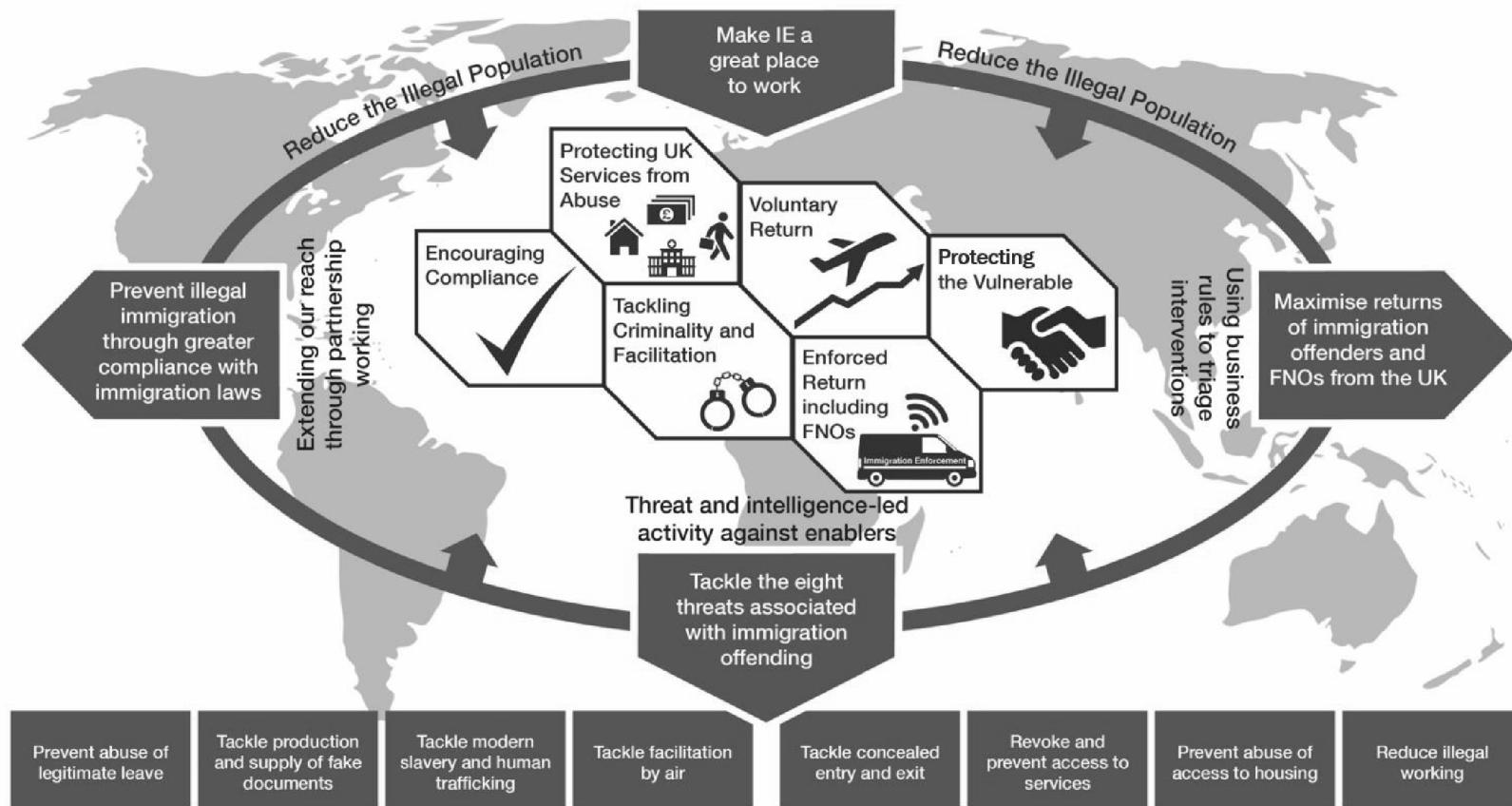
Our vision is to create a robust **person-centred approach**, develop a widespread culture of understanding and support, and build safeguarding measures into all stages of immigration contact and decision-making. We want to drive a **culture change** across our department to look beyond the obvious, we want our staff to feel truly empowered to exercise their **professional curiosity** to understand the needs of vulnerable adults and children.

We are committed to ensuring that vulnerability is at the heart of our work. We recognise safeguarding is everyone's responsibility and we are **engaging** with partners to make sure we continue to develop and fulfil that role.

The purpose of this strategy is to drive forward Immigration Enforcement's commitment to improve the way we interact and safeguard vulnerable adults and children.

Role of Immigration Enforcement

As part of Immigration Enforcement's 2020 Vision, any aspect of our role may bring frontline officers or caseworkers into contact with people who have been trafficked, vulnerable to exploitation or abuse, have a physical or mental health issue, or are vulnerable by virtue of their age. It is important that we see the person first without making assumptions around case types, or how they should be managed, instead approaching each case afresh on an individual, person centred way.



Context

As part of a well-functioning immigration system, Immigration Enforcement must operate within an appropriate context and timeframe, mindful of the impact of our actions on vulnerable adults and children.

Our Influences

Delivering a strong and consistent culture change across a large and varied Government Department with different ways of working and different ways of engaging with migrants is challenging. As an organisation we are constantly evolving and adapting the way we work to keep up with the changing environment and community factors.

We have been actively **listening to the voice of vulnerable people**, to organisations that support them and to our staff who encounter complex and difficult issues while carrying out their duties. Developing a deeper understanding of the triggers and indicators of vulnerability is key to identifying the needs of, and providing support for, vulnerable adults and children.

External reviews of our processes are significantly influencing the way we approach our work and interact. The independent reports by Stephen Shaw on welfare in detention, regular ICIBI reviews, and collaborative work with NGOs provide invaluable assessment on the impact our action has on migrants, and challenges us to do better.

IE is in the initial stages of developing a **Safety Valve Mechanism** to highlight and remedy areas of complex immigration case types, to prevent replication of the Windrush events.

Vulnerability Context

Organised immigration criminality is one of the fastest growing crimes in the UK, and we are working closely with law enforcement agencies to increase our vigilance on vulnerability and reduce the threats associated with immigration offending.

We are working with the police and children services to improve our protection for trafficked children, providing reassurance, breaking down barriers, building trust, and reducing the risk of further harm or exploitation.

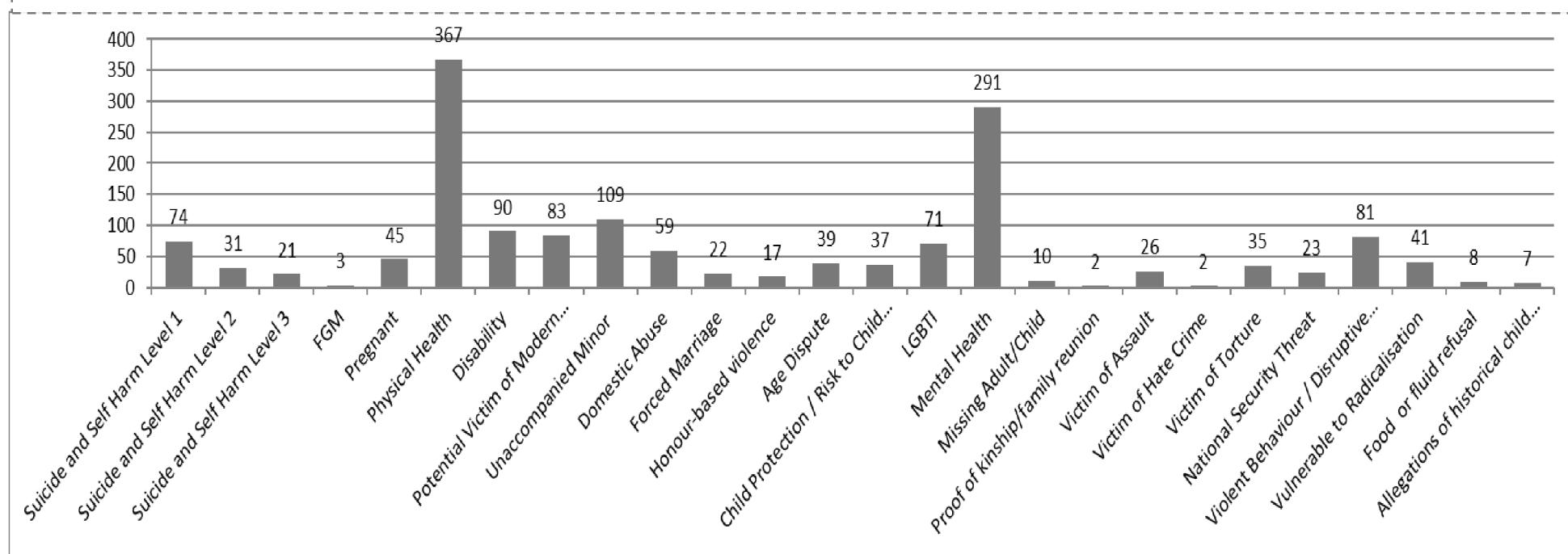
Vulnerability envelops a wide spectrum of people and can influence how we interact and respond when we carry out our functions. Many of the people we deal with require immediate and prompt safeguarding interventions because they have been victims or have been exploited. We are taking a multi-agency approach in many areas to improve our understanding and response.

- **Modern Day Slavery/Human Trafficking**
- **Victims of Crime**
- **Domestic Abuse**
- **Honour Based Violence**
- **Forced Marriage**
- **Vulnerable to Radicalisation**

The **Compliant Environment** is a range of cross government measures which restrict unlawful migrants' access to benefits and services, to encourage such individuals to either regularise their stay or to return home voluntarily. Having a range of early interventions and signposting for vulnerable adults and children may reduce their exposure to these measures, having taken steps to regularise their stay or return at the earliest opportunity.

Vulnerability Demographics

To improve our understanding of the vulnerability demographics a single cross-BICS Vulnerability Matrix was piloted for frontline staff to score and record vulnerability based on the information presented to them. Initial results from the pilot provided a picture of vulnerability factors.



Legislative Framework and Obligations

Section 11 of the Children Act 2004 places a duty on specified public bodies and key individuals to carry out their functions having regard to the need to safeguard and promote the welfare of children.

Section 55 of the Borders, Citizenship and Immigration Act 2009 came into force on 2 November 2009. Section 55 is intended to achieve the same effect as section 11 of the Children Act 2004. All Home Office staff and contractors have a duty, under section 55 to ensure that immigration, asylum, and nationality functions are discharged having regard to the need to safeguard and promote the welfare of children in the UK.

The statutory guidance “Every child matters” published in November 2009 provides the guidance on how UK Visas and Immigration Enforcement should make arrangements to safeguard and promote the welfare of children. The statutory guidance was issued jointly by the Home Office and the Department for Children, Schools and Families under section 55 (3) and 55 (5) of the Act to accompany the Section 55 duty. The guidance sets out the key arrangements for safeguarding and promoting the welfare of children.

Office of the Children’s Champion offers all BICs staff safeguarding and vulnerability professional expertise, advice and support for complex children’s cases. They operate an inbox for queries and complex case consultation concerning children’s cases.

Adults at Risk policy came into force on 12 September 2016 in line with section 59 of the Immigration Act 2016, outlining the principles and process for making decisions on immigration detention, for the purposes of removal, of individuals who are or may be considered at risk.

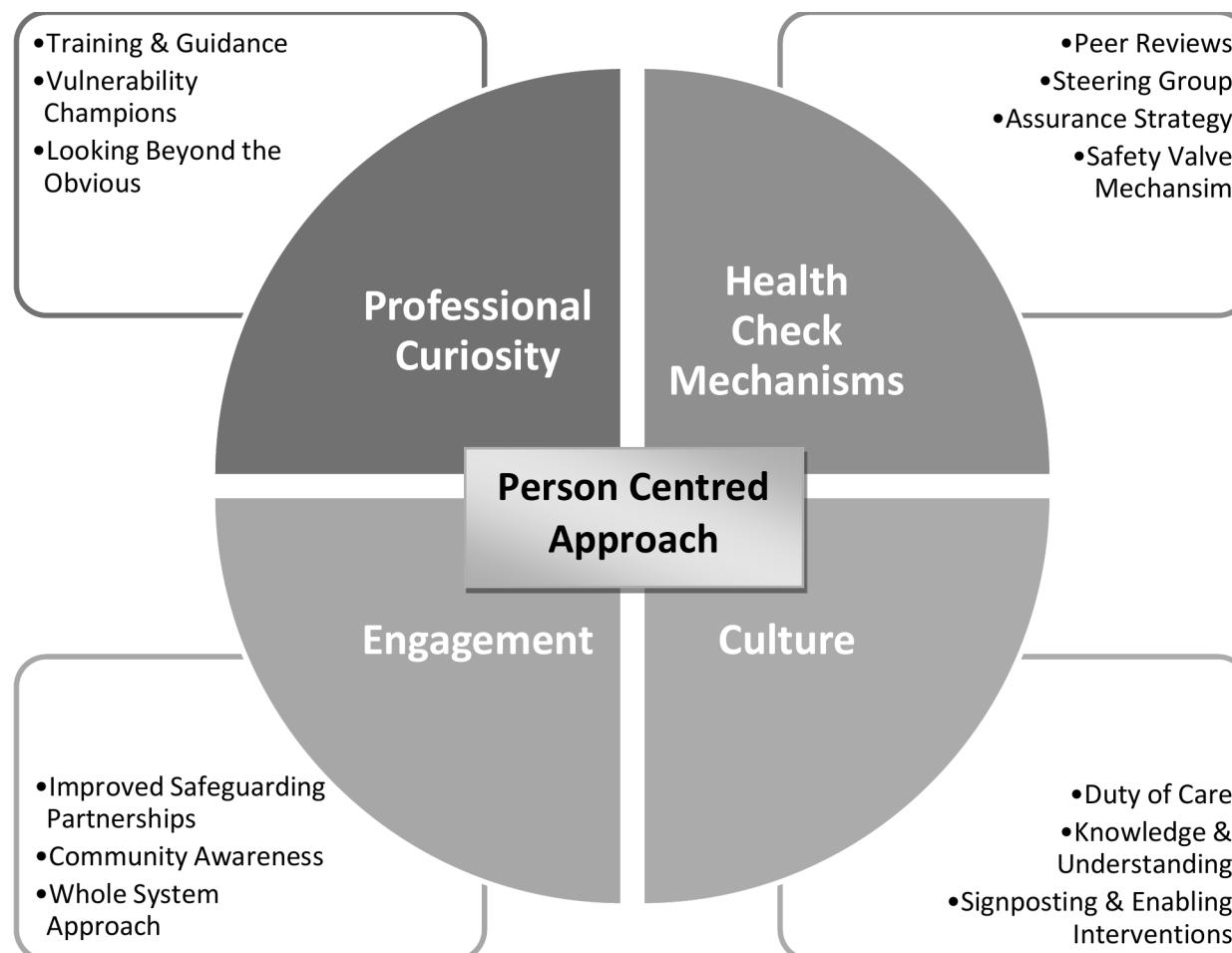
The Modern Slavery Act came into force in 2015 to give law enforcement the tools to fight modern slavery, with suitably severe punishments for perpetrators and enhance support and protection for victims. Under the Act public authorities have a duty to notify the Secretary of State of any person identified as a suspected victim.

Section 21 of the Immigration and Asylum Act 1999 provides a catch all gateway (within specific functions) for the sharing of information for policing and crime purposes.

The Immigration Act 2014 and 2016 introduced a range of cross government measures which restrict unlawful migrants access to services and benefits, including access to housing, driving licences and bank accounts. Individuals are able to make representations to the respective bodies to contest any sanction applied, and the Right to Rent measures enable the Home Office to apply discretion when the individual is considered vulnerable.

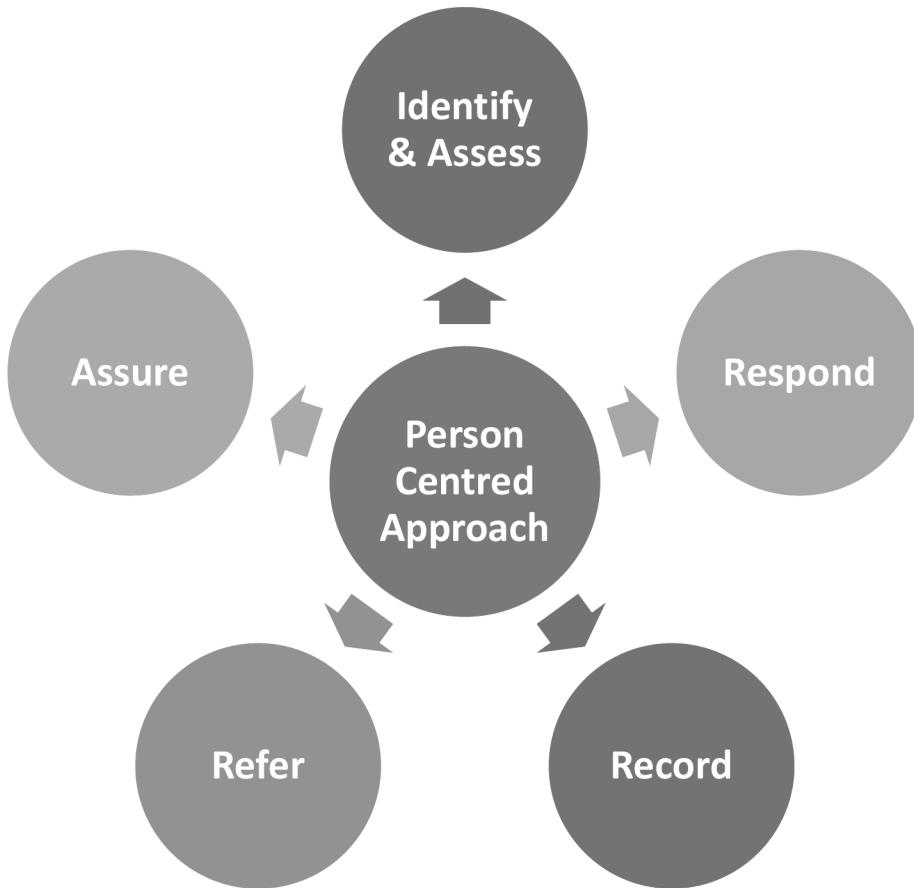
Vulnerability Strategic Principles

We will focus our ambition on five strategic principles to carry forward the changes to the way our organisation impacts and interacts with vulnerable adults and children.



The Person Centred Approach

Our vision is to create a person-centred approach where we see the person first, regardless of their current immigration status. Identifying potential vulnerabilities early in the process will then significantly influence how that person is managed – both in terms of the need of any immediate safeguarding steps but also in the longer term in respect of decisions around ongoing engagement and enforcement actions.



Identify & Assess – IE will drive greater observation of potential indicators by upskilling our staff at all levels, develop a consistent means of identifying, recording, flagging and tracking vulnerability, and ensure our strategic principles are understood and integrated into all our systems and processes.

Respond – Our staff will be trained to proactively undertake enabling interventions; every encounter or contact is an opportunity for a timely safeguarding intervention.

Record - For the next generation of immigration IT we are putting the person at the heart of our processes.

Vulnerability markers will track and highlight vulnerability throughout the person's journey through the immigration system; early identification, continued awareness and consistent assessment is key to our commitment to reduce and prevent future harm.

Refer - we will enhance joint working through our Vulnerability Champions who will look to identify opportunities for regular engagement with the police, OGDs and NGOs to drive more effective local and national collaborative safeguarding interventions.

Assure - Safeguarding is everyone's responsibility; we need to ensure staff at all levels take the appropriate steps to protect vulnerable adults and children.

Professional Curiosity

IE is developing its capability and understanding of the complex needs and issues surrounding vulnerability. We will make sure staff have the right training and guidance available to them, building a learning culture underpinned by the development of a vulnerability 'common curriculum'.

We are embedding Vulnerability Champions within every department to enhance awareness, facilitate appropriate and consistent responses, and equip our staff with the skills to dynamically respond to the fast-changing safeguarding landscape.

Culture

- We want to fully define our duty of care, where it starts and ends, so that we can own and discharge our responsibilities.
- We want to deliver a significant cultural change across all Immigration Enforcement staff and teams in the way they identify and support vulnerable people while carrying out their duties
- Our staff will be trained to proactively undertake enabling interventions, to sign-post information or referral points for people with vulnerabilities, to remove obstacles and provide solutions.

Engagement

- Developing strong people networks and channels of communications will be vital to its success.
- We will develop clear 'hand-off' arrangements with other agencies, to define transfer of professional responsibility, underpinned by local level agreements or national strategic frameworks.
- We will provide clear guidance to our staff to know how, and when to make referrals to the appropriate agency.
- To stimulate a whole system approach we will increase awareness of early identification and intervention, through consistent strategic messages, a vulnerability 'common curriculum' and an effective governance structure.

Health Check Mechanisms

- We will drive a multi-layered governance structure to review and improve our systems, through regular, honest feedback from our Vulnerability Champions and frontline staff.
- We will ensure our strategic level Vulnerability Steering Group, tactical level Vulnerability Forum and cross-BICS Safety Valve Mechanism will have the adequate resource and authority to drive the shift in knowledge and culture.
- We will seek the advice and expertise of national and local charities, support groups and other Non-Government Organisations to increase our understanding and provide an independent voice for vulnerable people.

Implementing the Vulnerability Principles

In order to successfully deliver the strategic principles within this strategy, an action plan has been developed to outline the overarching activity required to improve our protection of vulnerable adults and children.

The Vulnerability Team and agreed strategic owners will be responsible for driving these actions forward, oversee and monitor progress of the strategic principles and their associated deliverables via the targeted action plan. Progress will be reported through IE's appointed strategic owners in the Strategic Delivery Plan.

Strategic Principle	Strategic Actions
Person Centred Approach	Promote the person centred approach across-BICS to see the person first rather than their immigration status.
	Develop increased opportunity for safeguarding interventions by ensuring that vulnerability is always considered at all stages of contact and decision making.
	Ensure that all vulnerable migrants encountered receive the relevant support and assistance they require regardless of their immigration status.
	Develop IT systems with a person-centric approach to see the person first - where vulnerability can be systematically identified, assessed, mitigated and managed, recorded, flagged and tracked.
Professional Curiosity	Develop a vulnerability 'common curriculum', a programme of training and development to increase the capability and understanding of IE staff at all levels.
	Develop a network of Vulnerability Champions within each command to provide local expert advice and guidance, initiate local stakeholder engagement, develop and promote best practice, undertake honest reviews of IE systems and processes and feed into strategic owners.
	Develop an operational delivery plan to accredit and professionalise the Vulnerability Champion role.
	Work with the police to enhance our response and support of victims of crime and exploitation.

Culture	Working across-BICS, define our duty of care, to understand where our legal responsibilities start and end.
	Develop specific guidance and training for staff to undertake enabling interventions to sign-post information or referral points for people with vulnerabilities, to remove obstacles and provide solutions.
	Drive greater understanding of vulnerability issues, themes and indicators and enhance awareness of the impact of our actions.
Engagement	Review and evaluate IE's joint-working programme to protect unaccompanied, trafficked children with police and Children's Services to enhance its capability for a national roll-out.
	Review the existing relationships with safeguarding partners and provide a one-stop solution for referrals from outside IE into BICS.
	Increase and promote community awareness of modern slavery, human trafficking, honour based violence, domestic abuse and other vulnerabilities to reduce the opportunity for exploitation and increase the number of people who leave voluntarily and referrals into the NRM.
	Work with the Office of the Children's Champion to develop case study workshops to provide effective feedback and improve approaches to identifying and responding to vulnerability.
Health Check Mechanisms	Develop a vulnerability and safeguarding assurance strategy to feed directly into the existing assurance strategies, vulnerability lessons learned process, steering group and forum.
	Develop a structured system of improvement through a vulnerability lessons learned process which feeds into both the strategic forum and frontline staff.
	IE Vulnerability Steering Group to set the strategic direction for IE's approach to dealing with vulnerable persons across IE and to ensure they are managed consistently through our processes.
	Develop a network of reputable external organisations to undertake regular health checks of our vulnerability processes and safeguarding measures.

Links and Partnerships



Effective collaboration, partnership and appropriate information sharing between immigration departments, external government agencies and NGOs is key to IE effectively safeguarding vulnerable adults and children.

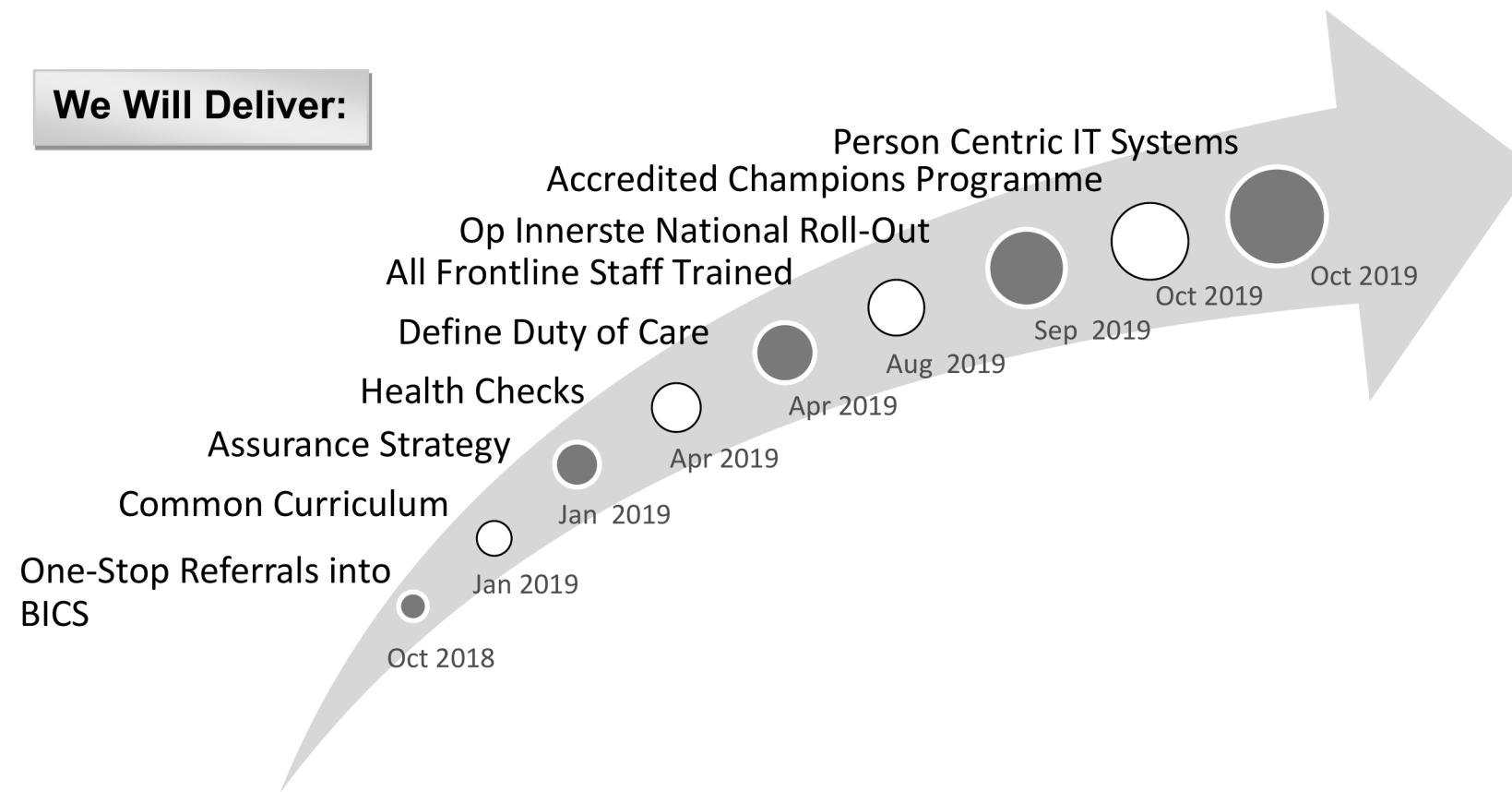
The National Command and Control Unit (NCCU) acts as initial point of contact for Local Safeguarding Children's and Adults Boards and other professional partners, allowing us to better engage with and support partners and to provide a more efficient tactical response.

Protecting vulnerable adults and children is a key cross-cutting departmental priority; we will continue to build multi-agency engagement to gain a clearer understanding of our capability and build confidence in our systems and safeguards.

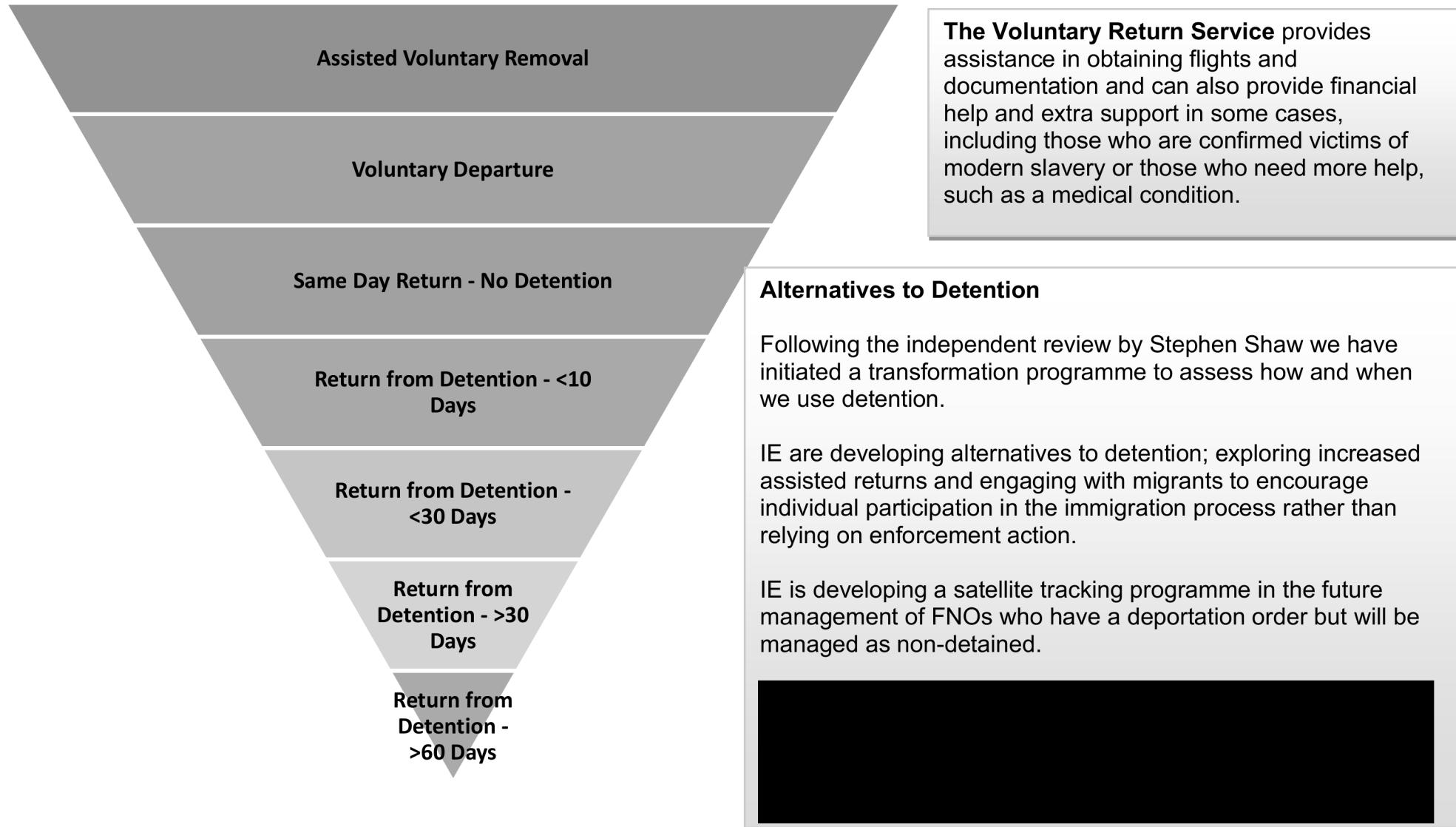
We are already reaching out to local communities and organisations: embedding officers within the NSPCC Child Trafficking Advice Centre (CTAC); developing local support and advice networks for vulnerable reportees through proactive ICE and ROM engagement with local charities and organisations; and building a network of Vulnerability Champions to begin a more focussed, joined up approach to building local and national partnerships.

What will we deliver?

To ensure the delivery of the vulnerability strategy we will be engaging and working across BICS in a number of key areas: the BICS Vulnerability Matrix, ATLAS functionality & Person Centric Approach, IE Business Design & Rules, PRONTO, defining our Duty of Care, training & guidance and the Safety Valve Mechanism.



We are committed to a fair and humane immigration policy which welcomes and celebrates people here legally. For those who have no legal status within the UK we will work in partnership with OGDs and support groups to help those who are able to return home voluntarily. Our ambition is to facilitate increased numbers of voluntary returns and reduce the occurrence of detention-based removals.



Success and Evaluation

We will be able to demonstrate we have succeeded in our vision, when vulnerable people **are managed consistently through our processes**, there is a widespread **culture of understanding and support**, and we have **robust safeguarding** measures at all stages of immigration contact and decision-making.

We will evaluate the influence of the new immigration technology on the department's ability to facilitate a **person-centric approach**, the impact of the 'common curriculum' and network of locally embedded experts on **timely identification** and safeguarding **intervention**, and the effect of the **lessons learned and feedback mechanisms** on IE's culture of understanding and support.

We will review our strategic actions to evaluate and measure IE's commitment to protect vulnerable adults and children through a variety of measures:

- We will formulate **quantitative** measures to identify the impact immigration IT technology has on delivery of the strategic vision. We will develop IT business rules to monitor and review recording of vulnerability and safeguarding interventions across IE.
- **Quantitative** review of the lessons learned mechanism to assess the progress and effectiveness of change.
- Regular **qualitative** internal working groups with staff at all levels to review capability and cultural changes within IE.
- Regular **qualitative** review of the training and guidance through a robust system of feedback and review, and regular **quantitative** review of the use of the Horizon reference point.
- **Qualitative** evaluation of our systems and processes through multi-agency reviews to measure improvements aligned to the strategic vision.

Our success will be measured on the timely delivery of our strategic goals and the extent to which we achieve our vision of a robust person-centred approach, create a culture change across our department, and empower our staff to exercise their professional curiosity in the way they interact with and safeguard vulnerable adults and children.