

## **Written evidence submitted by GEOGroup (COR0033)**

### **Guidance and Planning**

#### **1. What business continuity plans are in place at your IRC to respond to an outbreak of infectious disease?**

- The healthcare provider for Dungavel IRC, Med-Co Secure Healthcare Ltd. have in place an outbreak plan that relates to any potential outbreak and is being applied to COVID-19 planning.
- The centre supplier, GEO UK has contingency planning arrangements in place for dealing with pandemic outbreaks. This plan focuses on isolation protocols for symptomatic and non-symptomatic detainees, hygiene provision and barrier controls. There is provision within the planning for a full lock-down that prevents any staff member from leaving or entering the site in a serious emergency. In the event of a full lock-down, there are provisions for three months of food on-site and there are suitable areas for staff accommodations. Staff that are not on-site at the time of a lockdown will be deployed to assist externally.
- In terms of business continuity, GEO UK intends to deliver a full operational regime while providing a safe and secure environment for staff and the detainees in our care. If the need arises activity schedules will be adjusted to accomplish this, while staffing levels permit. This will remain under constant review and will be discussed on weekly risk management calls with GEO Corporate Operations.

#### **2. Does your planning for COVID-19 differ from these plans and if so, how?**

- The plans have been adapted to the specific requirements of this virus based on NHS guidelines. The main change is regarding isolation containment protocols. As always, symptomatic detainees will be isolated separately from asymptomatic detainees. Additionally, we will cohort any detainee who may have been exposed separately from all other detainees, even if they are asymptomatic. This essentially requires having three separate areas throughout the centre which can accommodate the three categories of detainees. To further minimize the risks of potential exposure, all detainees are currently being assigned to their individual single-person rooms regardless of what category they fall under.
- Additional hygiene training has been issued to staff and detainees via online briefings, posters and face to face briefings. This includes information relating to COVID-19 specifically, handwashing techniques and social distancing.

- Other measures that take place as standard during an outbreak scenario, include the issue of PPE (masks, gloves and aprons) and sanitiser located at strategic stations.
- There are also documented daily health checks of all detainees including temperature and wellbeing checks conducted by the healthcare team.
- Social and legal visits have been suspended, with Skype video calling being offered as an alternative. Detainees are also being issued £10 mobile phone credit for free every week to ensure that they can keep in contact with friends, family and legal representation.
- Freedom of movement remains with emphasis on social distancing.
- Cleaning has been increased in all areas, including cleaning of all gym equipment, library computer terminals, etc. after each use.
- Detainees are being texted every day with a reminder to comply with social distancing and hygiene requirements.
- Staff have been given the opportunity to change into their uniform on-site and offered access to on-site shower facilities for use before and after their working day.
- In this unique pandemic situation, GEO and Med-Co have placed significant focus onto the mental wellbeing of staff and detainees. This includes ensuring that we provide stimulus for detainees in and out of isolation with a full and complete regime, augmented by suitable activities with social distancing. This includes garden groups/competitions, distraction packs, in room entertainment, access to gym and library facilities, Skype communication and food theme days. Med-Co has delivered a written guide with a focus on mental wellbeing and coping strategies for staff and detainees. The healthcare teams offer mental health check-ins with detainees during daily temperature checks and continue to offer one-to-one counselling.

3. **Who in your company overall is the senior manager with responsibility for the planning of COVID-19 response?**

- GEO — [name redacted] – Centre Manager
- Med-Co – [name redacted] – Healthcare Manager

4. **Who at your IRC is ultimately responsible for the delivery of COVID-19 contingency plans?**

- GEO – [name redacted]; Med-Co – [name redacted]

[as above]

5. **To whom do they report?**

- GEO - [name redacted], Vice-President – Security, GEO Secure Services
- Med-Co – Med-Co Clinical Director – [name redacted]

6. **What consultation is taking place to ensure your COVID-19 IRC plans are as robust as possible?**

- Consultation has taken place and remains ongoing with GEO Corporate Operations, Med-Co, Health Protection Scotland, Public Health Scotland and Public Health Lanarkshire on an ad-hoc basis to seek the latest guidance and to consult regarding specific situations. This includes multi-disciplinary conference calls to discuss the latest advice, Home Office guidance and best practice. Guidance is being updated regularly and all agencies are consulted when new developments take place. All Home Office restrictions are being adhered to and the latest social distancing and isolation protocols are being used. Public Health Lanarkshire is providing updates on a weekly basis.
- Healthcare continues to practice in line with guidance for infection prevention and control in healthcare settings issued by DHSC, PHW, PHA, HPS and Public Health England.
- All non-essential visits from visiting groups, social visitors and solicitors have been suspended; video calling is offered as an alternative.
- The IMB has also suspended visitations but are in contact via e-mail and telephone. The Centre Manager is providing a briefing twice a week.
- Staff are being briefed on the latest guidance via local intranet and e-mails. An awareness package has been issued via e-learning and safe systems of work are being developed, published and updated.
- Detainees have been given information in briefing packs that are translated if required and posters are in place in multiple languages.
- Detainees have been given hygiene information such as handwashing techniques. This has been conducted on a one to one basis and each detainee has an individual briefing pack and care plan.
- The healthcare team is conducting daily health checks on every detainee and utilising this time to consult with detainees to provide advice and guidance.
- The Centre Manager met with Police Scotland, who act as the mutual aid for Dungavel IRC in an emergency. They gave assurance there will be no disruption to emergency aid. Contact is being maintained to ensure that information is current.

- Fortnightly calls are taking place with Home Office Director of Detention and Escorting Services, local emergency services, local council, and all other centre managers to share best practices and any developments.
- Weekly meetings are taking place with GEO Corporate to share best practices and consult with experienced specialists.
- GEO is in constant contact with vendors and suppliers to ensure consistent access to essential items. There is currently sufficient food to last for three months ; cleaning supplies and hygiene products are stocked for four months.
- Detainee consultation is still taking place via drop-boxes and conference calling. COVID-19 has been added as an agenda items for all detainee consultation.
- Med-Co manager is maintaining regular contact with healthcare managers of all other centres and the centre manager is in regular contact with all other centre managers .

7. **In the worst-case scenario, were substantial numbers of detainees and/or staff unwell, how confident are you that your IRC would be able to operate safely, and humanely?**

- We currently have 56 staff employed as DCO's and our in-depth staffing analysis reflects the centre could operate safely and humanely with 10 DCO 's per shift. However, this would require the discontinuance of regular regime.
- The centre must provide 24-hour cover over 7 days per week (day shift and a night shift), so a minimum of 40 active DCO's would be required to keep the centre operational without affecting the level of service for detainees.
- A loss of more than 23% of staffing would begin to affect their abilities, however there are a few senior management staff (8) who retain DCO accreditation and would assist if needed.

8. **What additional support might you require to ensure that it could, and from whom?**

- Med-Co can acquire agency or temp staff if required (this may change depending on availability); however, this would require the CTC requirements to be relaxed for them to be trained to draw keys and radios. All staff would be PVG cleared but the Home Office would be required to provide some form of dispensation for this to be viable.
- Sourcing PPE and medical equipment such as masks and thermometer guards are proving challenging. Conversations have been ongoing with the various health protection agencies to source whatever can be obtained.

- We would welcome clarification on the status of performance measures and any changes to contractual requirements from the Home Office during this time so that focus can be placed onto infection control and safety without the full pressures of contractual compliance.

**9. If additional resource was required, would this fall under the terms of your contract with Government? If not, how would this additional resource be provided?**

- Additional staffing resources would not fall under any contracts and dispensation for non-cleared staff would not be routine. Agreements would need to be made regarding any significant costs. This may be done retroactively if required as a matter of urgency. This would need to be led and requested by the Home Office.

**10. What facilities within the IRC might have to be scaled back as a result of a possible outbreak? For example, would communal kitchens and computer access still be available to detainees?**

- The cultural kitchen has been closed and restrictions have been made to regime activities in order to comply with social distancing requirements. This involved the introduction of a booking service and limited numbers for the gymnasium and library facilities including computer access. Shop access has also been closed and replaced with an order and delivery service.
- Visits have been suspended; however, Skype terminals are available as an alternative.
- Faith practitioners will also not be attending site for communal prayer sessions e.g. Friday prayers or Sunday services, however they are able to telephone detainees and have been offered the use of Skype services to deliver faith sessions if required. Some faith practitioners have also been recording prayer sessions and making them available through video streaming services.
- The voluntary paid activities have been scaled back so that detainees are no longer working in the kitchens etc. All detainees are offered the same rate for cleaning of their own rooms.
- All services are currently still available in some capacity but if staffing reaches a critical threshold then consideration may be given to withdrawing services such as facilitating immigration interviews. Wherever any service has been withdrawn or scaled back, an alternative service has been introduced.

- Similarly, the centre is still operating with freedom of movement for detainees. They have full access to the grounds/fresh air from 06:45 to 21:45 every day.
11. **What arrangements are being made to increase transportation to and from hospitals, if required?**
- Transportation to hospital for any suspected COVID-19 cases would be by Ambulance only. Healthcare remains in contact with local hospitals and NHS to ensure that the site is updated to any possible disruptions to ambulance availability. There are also bi-weekly calls with all emergency services and the centre manager. The ambulance services have given assurances that they will still be able to provide a full service and have requested an early warning system to give them time to prepare.
12. **What plans do you have to ensure that advice to detainees on COVID-19 measures, both from Public Health authorities and from you, is available in languages other than English?**
- Detainees have received guidance via Big Word translation services where required . Posters with information are currently displayed in a variety of languages that have been officially translated and sourced from NHS Scotland.

### **Protecting Detainees**

13. **What advice is being given to detainees about protecting themselves against the virus?**
- Detainees have been briefed on social distancing which is reinforced by staff daily. They also receive daily text reminders about handwashing and social distancing. Handwashing/hygiene classes and posters have been issued.
  - A social distancing tape has been added into the dining area to ensure that the correct distancing is always observed. We have also rearranged the seating and removed several chairs to ensure social distancing.
  - Mental health surveys and leaflets have been issued to combat some of the psychological effects of the current lock-down and global situation.
  - Fitness surveys and isolation fitness guides have been provided to educate detainees on physical health measures that can be conducted during lock-down without gym equipment.

14. **What additional medical services, if any, are being made available to detainees to ensure that any displaying symptoms can be quickly, securely and safely tested?**

- There is open access to healthcare throughout the day and a nurse available throughout the night. Health checks are completed routinely for every detainee at 11:30 AM which includes a brief medical and mental health consultation as well as temperature checks.
- There is currently no widespread COVID-19 testing being conducted in the immigration estate, however we have access to several testing kits which would be used under the direction of Public Health Lanarkshire.
- All detainees that present symptoms will be treated as though they are positive for COVID-19 and will be isolated in a single room with en-suite hygiene facilities and an intercom system for staff communication. All symptomatic detainees will be placed onto a care plan to ensure their needs regarding food, hygiene, fresh air and activities are met. Exposure to symptomatic detainees is being limited by assigning a designated GEO staff member and designated nurse who will be responsible for the needs of that detainee and welfare checks throughout the day. No other staff will have contact to minimise risk.
- Although not medical in nature, GEO and Med-Co recognise that there may be psychological trauma during periods of isolation and mental health may be affected significantly. Med-Co is providing information and consultation on mental health issues and GEO is attempting to mitigate anxiety by introducing distraction packs for use in room containing puzzles, art materials and assorted novelty/entertainment items. GEO has also reviewed food menus and is running theme days to provide an interesting food variety. Safe activities are being used to encourage time in the open air such as a gardening challenge that can be completed at a safe social distance.

15. **If required, how will detainees be safely isolated while preserving their dignity and access to vital services including medical, pastoral and legal advice?**

- Detainees will be safely isolated within a single roomed unit with en-suite toilet and shower facilities. The door will remain unlocked with the detainee asked to remain inside and isolated. Meals and activities will be delivered to the door and PPE (masks, gloves, aprons) used to protect staff and detainee. Mobile phone communication will always be available, and a free weekly £10 credit top-up will be provided. Intercom system in rooms

always allows communication. Medication and medical treatment will be issued in room.

- All isolated detainees will have a full care plan that will ensure that they are afforded at least one hour in the open-air, their bedding and towels are laundered, meals and activities are provided including communication with solicitors or pastors. Bottle water is provided daily and any waste is picked up regularly.
- There is currently no restriction on freedom of movement for non-isolated detainees and they are free to access fresh air within the grounds throughout the day.

**16. Have you assessed whether cleaning usually undertaken by detainees should instead be transferred to a professional service until the rate of transmission has reduced?**

- Detainee cleaning is now restricted to their own personal rooms. All other areas are cleaned daily by the housekeeping staff; chlorination of all areas has been added to their weekly schedule.
- Clinical areas and kitchen areas are cleaned daily and are now deep cleaned by professional teams on a bi-weekly basis and sanitised by Sanondaf. The reception/discharge area has been added into this service as well as other high traffic areas such as the gymnasium, information and learning centre. This sanitisation is now certified to cover COVID-19 .

**17. The nature of accommodation in IRCs increases the proximity of detainees to each other. Are you considering any changes to accommodation to allow more effective distancing between people?**

- All detainees are now housed in single accommodation rooms.
- Social distancing marks have been placed in the floor of the dining area to promote proper spacing and the seating arrangements has been changed.
- Regimes have been altered to limit usage and a booking system has been implemented. The gym is limited to one user per room and the library/computer room is limited to two users at a time with a suitable distance between terminals.
- The shop/cafe area has been closed and replaced with an order on demand system, where detainees can order from the unit officer and have items delivered.
- Visits and religious services have been suspended; Skype is offered for detainee social/legal contacts and religious visitors as well as the introduction of recorded religious services/teachings being made available through video streaming services.

18. **300 detainees have been released from IRCs in recent days. Are any released from your IRC being tested on departure to ensure any who might be infected can be transferred straight to medical care or isolation?**

- All detainees are temperature checked daily at 11:30 AM. Any departures set to occur prior to this time will be given a documented health screening prior to release. Any symptoms found during these health screenings will be reported and the detainee may be held and isolated if deemed appropriate. The Home Office, in conjunction with Public Health, would have final determination as to whether release is appropriate.
- All detainees are being issued with discharge leaflets containing information on COVID- 19, social distancing, self-isolation and handwashing as well as available community care. Detainees on departure will also be provided with a food hamper to assist on release in case they have difficulties obtaining food.

**Vulnerable Detainees**

19. **What information do you hold about vulnerable detainees, and how is this being used to develop plans to protect them from COVID-19?**

- An adult at risk (AAR) register is maintained and a meeting is held on a weekly basis with the Home Office engagement team to discuss vulnerable detainees with regards to any safeguarding considerations and to pass pertinent information to casework with regards to whether continued detention remains appropriate. Safeguarding considerations in relation to release or return are also discussed.
- Where detention is maintained and a detainee has been identified as being particularly vulnerable, they are placed onto a care plan and offered the opportunity to self-isolate within the centre as per those under precautionary isolation. If this offer is rejected, detainees are asked to sign a disclaimer to record that they were offered and declined.

20. **What assessment have you made of the possible additional risk to vulnerable detainees (including but not limited to those who are older, immunocompromised or pregnant)?**

- Each admission is carefully considered, and risk assessed. Current resident detainees are also being managed via the AAR register and Rule 35 process where required in order to have vulnerable detainees released.

- Pregnant females and over 70-year-old persons should not be detained in line with AAR policies.

21. **What measures are being taken to protect vulnerable detainees, while preserving their dignity and rights?**

- As above

22. **What consultation is being undertaken on an individual level with those detainees, to ensure they have the correct treatment and protections?**

- We have treated all detainees as equally vulnerable during this time and held individual consultation to provide information regarding the virus and brief them on hygiene measures and social distancing .
- Detainees who have been identified as particularly high risk have received a consultation with a healthcare professional as well as a representative of the custodial team to ensure full awareness of any individual risks they may have. They are offered the facilities to fully self-isolate after being briefed.

**Protecting Staff**

23. **What additional hygiene measures have been put in place to ensure the wellbeing of detainees and staff?**

- Personal issue hand sanitiser is issued to all staff at the start of the year as standard, and sanitisers are placed around the centre at key points and in all the units as standard. Staff have also been supplied with alcohol and anti-bacterial wipes.
- All door handles, phones, keyboards and other regularly touched fixtures and fittings are being cleaned 3 times per shift by the housekeeping staff. All staff offices have additional cleaning materials such as alcohol wipes for staff to maintain.
- Advanced infection prevention and control are in effect. Clinical areas and kitchen areas are deep cleaned by professional teams on a bi-weekly basis and sanitised by Sanondaf. The reception/discharge area has been added into this service as well as other high traffic areas such as the gymnasium, information and learning centre. This sanitisation is now certified to cover COVID-19.
- Staff have been offered on-site shower facilities to use before and/or after work if desired. Staff are given the option of changing into uniform on arrival/departure.
- Staff have access to PPE including masks, aprons and gloves as precaution. Reception staff are issued daily as standard.
- Staff have been issued the same hygiene guidance and handwashing advice as detainees.

- Social distancing is being advised and enforced throughout the centre.
- Shared items such as keys and radios are being cleaned on return.

**24. How is the effectiveness of these measures being monitored?**

- Managers conduct daily checks of all areas and spot check cleanliness and hygiene. This is recorded on daily check sheets.
- Certification and reporting are received from Sanondaf.
- Staff sickness is being monitored locally and at corporate; logs of isolations are maintained to track any patterns or areas of concern. Staff sickness remains low with no confirmed or suspected cases of COVID-19 in the staff or detainee groups.
- The site is currently looking at options for giving staff daily health checks either through temperature tests or by commercial COVID-19 testing kits as they become available. However, there are certain issues with this including GDPR issues and issues around consent. Consultation will take place with employment solicitors and labour unions to determine the feasibility of health checks on arrival to work.
- Staff returning to work after sickness absence or isolation are being contacted to complete a pre-return to work interview over the phone to determine if they may return to work safely.
- A paid daily clean room competition is run to encourage detainees to keep their rooms always clean.

**25. What advice is given to staff to assist them in safeguarding their health both at work, and outside work?**

- Staff have been briefed through e-mails and local intranet as well as through an online training package regarding hygiene and social distancing as well as general information about the virus as it develops.
- Informational posters are in place and links to Health Protection Scotland and Public Health Scotland websites have been issued to staff.
- A safe system of work will be published imminently to collate all information given. This will be updated regularly as the guidance changes.
- Staff have full access to IT systems and are being encouraged to access government resources and keep up to date.
- Staff have been asked to consider using on-site showers and changing prior to returning home.
- Staff receive training as standard on infection prevention and blood borne viruses.
- Staff have been issued guidance and information regarding car-sharing.

- Staff have been advised to follow the government guidelines stringently. There are also notices displayed at site entrance and throughout the centre.
- Staff have been given assistance sourcing food and other sundries/essentials through use of site vendors to ease the pressures of the current shopping situation.

26. **What staff functions are being prioritised in the event of widespread infection? What action is being taken to ensure these priorities can be met?**

- There has currently been no noticeable reduction to any staff function and all functions remain operational. Ancillary functions such as finance and administration may be downscaled and allowed to work from home as need dictates. Priority will always be to maintain welfare, safety and security with regime activities taking lower priority.
- Most healthcare functions remain intact with priority being reception screenings, medication, GP consultation (via Skype if required) and daily health screening (temperatures). Healthcare admin and ancillary functions such as horticultural classes and group counselling services will be scaled back as priority dictates. The optician service is not available in line with government guidelines and routine dental provision is unavailable; emergency dental services are still facilitated.

27. **Some staff will find it difficult to work remotely owing to the nature of their job. What action is being taken, if any, to more readily allow them to do so if they are required to self-isolate?**

- Where possible, workers that can carry out work at home will be provided the tools necessary to do this, however staff will not be penalised for self-isolation and will qualify for company sick pay. Due to the nature of the job, many functions cannot be completed from home.

28. **What facilities are available to isolate staff on site, should that be necessary?**

- There is currently no intention to allow self-isolation on-site. Staff are being asked to follow current guidance and isolate at home and not attend work if exposed or symptomatic. Staff will be asked to leave site if they attend displaying any symptoms.

29. **What PPE is being provided as standard to staff? What assessment have you made of how much PPE you will need in total to protect your staff from infection?**

- Aprons, gloves, masks and shielded glasses, if required, are available to

staff. Hand sanitiser and alcohol wipes are also available as standard.

Requests have been made to Public Health Scotland for further supplies and alternative supply routes are explored as necessary.

- PPE (gloves, masks, aprons) are made available to staff outside any isolation zones. Detainees are also provided with masks to wear when staff are delivering food, medicine etc.
- Gloves and sanitiser are available throughout the centre.
- Masks are not issued as standard and are in use only when there is a symptomatic detainee or detainee in precautionary isolation. The only staff that wear masks and gloves as standard are reception and healthcare staff conducting daily health checks.
- Par levels of PPE are maintained based on internal hazard assessments and documented staff usage. If necessary, needed supplies can be provided by GEO Corporate.

30. **Are staff being instructed to change any of their usual working practices in order to keep themselves and others safe? If so, how?**

- Staff are being asked to observe social distancing in all aspects of the job. Certain hygiene practices such as the use of gloves when searching detainees and property are standard infection controls used in the centre routinely.
- Regime activities and shop access are now being controlled via booking systems to allow better social distancing.
- Meetings have now been cancelled or restructured to be completed via video conferencing and information is being distributed electronically.
- Daily briefing sessions have also been replaced with information packs online.
- All training is being conducted through e-learning as an intermediary step until full refreshers can be completed after social distancing has been lifted.
- Staff are being asked to clean their working areas more regularly and to consider using the hygiene facilities (access to changing/shower facilities) prior to starting work and after completion of their shift.
- Staff have been asked to limit car sharing and follow related government guidance.

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