Committee Secretary
Joint Select Committee on Australia's Immigration Detention Network
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

20 January 2012

RE: Submission to JSC and response to claims by former IHMS employee

International Health and Medical Services Pty Limited (IHMS) appreciates the opportunity afforded to it by the Joint Select Committee on Australia's Immigration Detention Network to respond to a submission made by a former IHMS employee.

IHMS is a contracted health services provider for people in immigration detention. We are proud to provide these essential services on behalf of the Commonwealth, represented by the Department of Immigration and Citizenship.

The following submission outlines the practices that are undertaken by IHMS in delivering appropriate primary and mental health care for persons in detention, and responds to the misrepresentations and issues raised in the submission by the former employee.

Employment

IHMS offers a range of employment engagements across the immigration detention network, from full-time employment to short term contracts. IHMS utilises these models of employment to ensure that we can meet the health needs of clients in the dynamic and challenging environment in which we operate. Staff are recruited against the professional qualifications and registrations required. All IHMS employees and contractors operate within the applicable workplace laws and within the guidelines of the relevant professional body, college or association.

As a health service provider, IHMS has high standards of professional conduct and we expect our staff to meet those standards. We expect all staff to execute their role in a professional and ethical manner and we support that approach through our training and employment practices.

Confidentiality

All IHMS employees sign a confidentiality agreement, which is a requirement of the health services contract that IHMS has executed with the Department (IHMS has previously forwarded a copy of that documentation for the benefit of the Committee). It is essential that a confidentiality agreement is signed in order to maintain the confidentiality of client information. Confidentiality agreements are a standard procedure across many companies, especially in the provision of medical services where client confidentiality is of upmost importance.

Induction

All IHMS employees undergo a comprehensive induction and training program before they commence work at an Immigration Detention Facility (IDF). The induction training program covers:

- IHMS company background and mission statement;
- Immigration detention values;
- Delivery of services;
- Site-specific information including the profile of the client population;
- Health information system;
- Clinical and management oversight; and
- Interactions with the Department and other contracted services providers.

IHMS operates an ongoing education program for staff including e-learning and on-site training. When staff commence their employment at an IDF they are assisted in the role by the on-site Health Services Manager and their work colleagues. Employees are also supported by the IHMS Medical Director in their respective discipline.

Due to the dynamic and challenging nature of Australia's Immigration Detention Network there are several constraints on services at centres. Firstly, there is a tremendous need for medical services within the Immigration Detention Network, which means staff are often transferred from a centre to fulfil a need at other centre in the network. There are also constraints on accommodation in rural and remote centres, especially Christmas Island, where accommodation restrictions limit the ability for extended handovers. This is why IHMS utilises its health information system to support this process and further supports staff through Health Service Managers, Clinical Team Leaders and Medical Directors who are more aware of extended case histories.

Multi-disciplinary approach

IHMS is contracted to provide health services to people in detention. This includes:

- the provision of primary and mental health services within immigration detention facilities;
- the coordination of specialist and allied health services by providers outside the facilities;
- the credentialing of healthcare providers for those in community detention;
- the operation of a Nurse Triage and Advice Service for Commonwealth or Detention Service Provider personnel to call when clinic services are not available after-hours; and
- clinical reporting functions to support the Department and Ombudsman requirements.

IHMS provides these services within the context of the Immigration Detention Key Values and the terms of the Health Services Contract.

Over and above our contractual obligations, IHMS is committed to providing professional, respectful patient care. Our staff have a strong medical ethos which is reflected in the mission statement for IHMS:

> *IHMS will provide a level of healthcare to people in immigration detention consistent with that available to the wider Australian community, taking into account the diverse and potentially complex health needs of people in detention.*

These services will be provided in a professional manner that is clinically appropriate, without any form of discrimination, with appropriate dignity, humanity, cultural and gender sensitivity, and respect for privacy and confidentiality.

In order to deliver these services to clients in detention, IHMS employs a multi-disciplinary approach at IDFs. Composition of the teams will vary from site to site depending on demand and contract arrangements, but generally teams are comprised of:

- Regional Health Service Managers (RHSM)
- Clinical Team Leaders
- Psychologists
- Psychiatrists
- Mental Health Team Leaders
- Mental Health Nurses
- Registered Nurses
- Immunisation Nurses
- General Practitioners
- Medical Directors
- Paramedics
- Counsellors

IHMS' comprehensive induction and training program aims to foster a harmonious, multi-disciplinary approach with a clear understanding of each individual team member's role. This approach recognises and utilises the individual specialties of all team members and their professions. Team members from one discipline are not expected to fulfil the role of other team members from another discipline.

It must be emphasised that IHMS, under the Health Services Contract, is responsible for primary and mental health services and the co-ordination of specialist and allied health services externally. Referral services are utilised by IHMS where appropriate and a client requires a higher level of care, including referrals to psychiatrists, specialists and public health services. On Christmas Island, torture and trauma counselling, for example, is conducted by the Indian Ocean Territories Health Service (IOTHS), which has an appropriate team equipped to cater for this need.

Due to the high demand for health services, particularly mental health services, in the Immigration Detention Network and the limited resources that are available, there is an emphasis on efficiently delivering services so all members of the client population can receive the attention and care they need. In order to achieve this there needs to be a balance and a value for time management, so all clients can receive treatment when needed. IHMS complements these services and demands with the use of external specialists as required.

Client

All persons in detention and in the community are referred to as "clients" by IHMS in accordance with the Government's Detention Key Values and the Health Services Contract that is executed by the Department. The work undertaken by IHMS for these "clients" is, of course, carried out in accordance with the terms of the contract executed with the Commonwealth. For the purpose of staff within the Immigration Detention Facilities these are the clients they attend to on a daily basis.

Communication

IHMS has in place protocols that enable efficient and effective communication with the Detention Services Provider. These communication protocols will often require that IHMS employees communicate information directly to their manager to ensure consistency of service and enable all factors and concerns within the health team to be considered. These protocols are essential in order to ensure that Health Service Managers and team leaders have an understanding and knowledge of what is taking place with clients and understand their needs. It is also essential, considering the multi-disciplinary nature of our services, that all facts are taken in to account in communications with various stakeholders.

IHMS has clear procedures for the response to and reporting of incidents. The Health Services Contract specifies the reporting and timeframes required by the Department. Different requirements are in place for reporting which respond to different grades of incidents. IHMS has procedures that detail the internal reporting requirements against these definitions. The procedures for response include assessment of client condition, treatment and escalation protocols. These procedures reference State health requirements and the involvement of external service providers as appropriate. Protocols are in place for managing the personal health records of clients in order to protect client privacy. Personal health records are accessible only by IHMS staff and can be provided to the Department or other authorised government entity on request.

Model of Mental Health Service

IHMS recognises the need for appropriate mental health care within the Australian Immigration Detention Network and acknowledges the difficulties that are presented in delivering mental health services to a client population from a variety of backgrounds. There is a general acknowledgement that there has been a growing demand for mental health care in the Immigration Detention Network over the past 18 months. Over this time IHMS has worked collaboratively with the Department to reconfigure our team structures to include more mental health professionals and improved governance structures to address this need.

Within Immigration Detention Facilities IHMS provides a range of mental health services including mental health counselling, psychological counselling, torture and trauma counselling and specialist psychiatric services. IHMS also plays a role in the Psychological Support Program (PSP) for clients, which was developed by the Commonwealth's Detention Health Advisory Group (DeHAG). Clients can be referred to these services through several means, including self-referral, referral by the Department and other contracted service providers, as well as by medical professionals who are employed by IHMS or other organisations. The practice of self-referral occurs by many means including walk-ins, by appointment, as well as by notification to IHMS, the Department and other contracted service providers. Mental Health outreach programs are also in operation throughout the Australian Immigration Detention Network and are supported by Serco and the Department.

IHMS performs a mental health assessment on each client upon arrival; and at regular intervals during detention, in line with the policies agreed with the Department. The initial assessment identifies the clients' mental state and also identifies any issues of trauma that a client may suffer have as a result of torture. IHMS recognises the significant work that is undertaken by our staff to conduct mental health screenings on arrival. At times of significant arrival activity on Christmas Island, IHMS staff have worked extended hours to ensure the health of clients is assessed.

It should be noted there is no correlation between the model of mental health care provided in the Immigration Detention Network and that which is provided in an institutional setting or in a public hospital. The provisioned

health services, including mental health services, are equivalent to those which are available to members of the general community. IHMS does not operate services following an institutional model, a stance which is encouraged by the Health Services Contract with the Commonwealth.

Clinical supervision

Clinical supervision and assistance for mental health professionals engaged by IHMS is available from a multitude of sources. An IHMS employee may seek clinical supervision from other team members, their Medical Director or externally, such as the Australian Psychological Association, if this is sought by the clinician. IHMS staff are also able to refer clients to psychiatrists and other external organisations if required.

All clinicians are able to seek peer review and supervision subject to seeking approval from the Department via IHMS. Unless exigent circumstances prevail at the time, there is no expectation that such a request would be refused. However, it is incumbent on the individual to seek such support in the first instance.

The provision of services by a private provider

The contract for health services with IHMS is a practical approach to the management of integrated health services to a population with complex, dynamic health needs.

The contract with the Commonwealth includes performance measures designed to track the delivery against key indicators such as timeliness of services and health record keeping. There exists a high-level of transparency in the delivery of health services in the Immigration Detention Network, which is evidenced by the conduct of this inquiry.

With the nature of the populations at many sites, the contract with IHMS allows the Department to rapidly scale up or down services as needed. This scalability allows for services to be adjusted according to demand and also to minimise excess capacity.

Under the contract, IHMS provides strong reporting capabilities to the Department, supporting responses to Parliamentary and Senate questions, media, freedom of information requests and other matters. The IHMS clinical reporting team also provides standard and ad-hoc reporting to the Immigration Ombudsman. With resources dedicated to this function, IHMS is able to support transparency around the delivery of health services and the health of people in detention.

Contracting health services to an external provider reduces the impact on the public health system. With many services being provided within the detention centres, referrals to the public health system are only made where clinically indicated.

With contract surety, IHMS is able to recruit and retain high calibre staff, supporting the long term viability of the services. Appropriate supervision, career pathways and continuing medical education means that staff progress in their profession and continue to improve the services.

A key tenet of the health services contract is the provision of advice and counsel on the healthcare of people in detention. This means senior medical advice on how services should be structured, emergency response planning, integration with the public health services, emerging health issues and preventative measures. Again, this contributes to the effectiveness, flexibility and long-term viability of the services. IHMS has been

represented at most of the inquiry hearings and has provided input at all stages of the process. We will continue working closely with other service providers and the Department to streamline the processes and procedures within the detention network for the benefit of all clients.

Thank you again for the opportunity to outline the practices that are undertaken by IHMS in delivering appropriate primary health care for persons in detention and respond to the submission made by a former IHMS employee.

If you have any questions, please feel free to contact our Director of Corporate Affairs, Rebecca Malzacher, by email to or by telephone on

Yours faithfully,

Michael Gardner
Regional Managing Director