Safeguarding Strategy

The following document sets out a framework for a safeguarding strategy which can be used by all AASC and AIRE providers. Much of the content of the framework document has been drawn from the safeguarding artefacts submitted by the providers as part of the contract BPtO process.

It is not intended that this high level strategy document will provide procedural detail although this is referenced throughout; rather it is focused on the key principles and aims of the safeguarding approach being suggested. It promotes a standard format to ensure consistency and completeness of coverage.

It is also not intended that a 'common' approach to a high level strategy document will mean that each organisation cannot reflect its own unique identity in the document. Suggested paragraphs have been included in the document but these can be changed so long as the key aim and messages are retained.

There are a number of benefits to be realised by both the Authority and its commercial partners in the adoption of a common and consistent approach to the safeguarding strategy supported by similar consistency in the more detailed policies and standard operating procedures.

- ➢ For both parties it demonstrates the new reinforced commitment to safeguarding required under these new contracts rather than being seen simply as a continuation of what existed previously.
- ➢ It clearly evidences the partnership between the Authority and its commercial partners in terms of its commitment to safeguarding vulnerable service users.
- ➢ It ensures that providers have a clear understanding of and are aligned to Home Office / UKVI safeguarding policy.
- ➢ There is a clear and common understanding of what is expected from the contract and how this will be considered from a contract compliance perspective.

Framework for a ....

SAFEGUARDING STRATEGY

(title sheet to include:
Document control
Corporate customisation)

Contents

Appendices

1. Foreword

In addition to any logos and watermarks this space allows each provider with the opportunity to set out its stall in respect of vulnerable service users and the commitment it is seeking to demonstrate. It should highlight the working relationship with the Home Office and might also reference who, in more general terms the strategy applies to.

All of the artefacts submitted for the BPtO have an opening section which can transposed in whole or part to the Foreword section.

2. Aims of the Safeguarding Strategy

This strategy acknowledges that some service users may have specific needs or be at risk whilst they are with the care of *provider name. (criteria 1.2.5.1).* This strategy, therefore, has the following overarching aims:

- To raise the level of awareness of vulnerability and its indicators amongst all employees of *provider name.*
- To embed and maintain customer focused safeguarding practice and procedures across the organisation.
- To ensure that Service Users at risk and those with specific needs are identified and protected with an appropriate response assuring their safety and well being. *(criteria 1.2.5.4)*
- To support the well being of staff who provide this response to vulnerable Service Users.
- To work in collaborative partnership with the Authority and other key stakeholders to support the safety and well being of vulnerable Service Users.
- To ensure that there is governance and accountability for the work undertaken.
- Adoption of a continuous improvement approach.

For the purposes of this strategy a Service User is defined as follows:

xxxx

3. Defining vulnerability

(suggested wording)

(provider name) will respond to any Service User deemed to be at risk or have any identified safeguarding needs as a result of their status as a Service User.

This strategy defines a child as a Service User who has not yet reached their 18th birthday.

This strategy defines an adult as a Service User aged 18 years or over.

Vulnerability is defined for the purposes of this strategy as a person, child or adult, who is, or may be

- in need of community care services by reason of mental or other disability, age or illness, or;
- unable to take care of themselves or unable to protect themselves against significant harm or exploitation, or;
- at risk of self-harm or suicide, or;
- a victim of modern slavery.

Indicators of vulnerability are set out in Appendix A

4. The legal context of safeguarding, Home Office policy and indicators of vulnerability

(suggested wording)

4.1 <u>Legislation</u>

There is no single piece of legislation which covers the protection of children and vulnerable adults, however, in respect of its relationship with Service Users (name of provider) will be mindful of and adhere to the requirements of the following key pieces of legislation:

- Data Protection Act - 2018 (incorporating GDPR)
- Freedom of Information Act - 2004
- Equality Act - 2010
- Children Act - 2011
- Human Rights Act – 1998
- Female Genital Mutilation Act - 2003
- Sexual Offences Act – 2003
- Modern Slavery Act – 2015
- Care Act – 2014

Etc

4.2 <u>Home Office Policy</u>

It is the responsibility of *(name of provider)* to ensure that guidance and training provided to staff regarding the identification and management of vulnerable Service Users with special needs, or at risk Service Users, is kept up to date and aligns with accepted good practice, and that *(name of provider)* has sought input from the Authority to ensure that guidance and materials align with the Authority's strategy on safeguarding. *(criteria 1.2.5.3)*

4.2.1 The most significant and relevant Home Office legislative instrument is the Borders, Immigration and Citizenship Act - 2010, section 55. This concerns the responsibility to act in the best interests of the child and this will also apply to *(name of provider)*.

4.2.2 In addition *(name of provider)* will align its own policy, guidance and procedures with the Authority's strategy and approach. This consists of:

> ➢ UKVI safeguarding children strategy

> ➢ UKVI safeguarding adults strategy

> ➢ Indicators of vulnerability (see Appendix 2)

5.How the aims of the strategy will be delivered

5.1 Governance

This section should address how the provider is going to exercise due diligence in its responsibility to safeguard vulnerable service users and how it will, therefore, deliver the aims of the strategy.
My suggestion is that this should be considered at 3 levels:
- Strategic oversight (governance board with TOR and clear objectives aimed at continuous improvement borne out of lessons learnt, strategic oversight of delivery aims and risk management.
- o - Tactical oversight (how quality of the work is assessed in line with the standard operating procedures). It should also reference the requirement for inspection and reporting procedures as per the schedule criteria *(criteria 1.2.5.4).* See also the section below on Processes and procedures. Finally it also needs to reference the requirement to maintain complete and auditable records. *(also criteria 1.2.5.4)*

- o - Operational case oversight which would involve staff performance, monitoring and supervision, individual case reviews and serious incident reviews.

5.2 Engagement and Partnership Working

This section should set out the principles underpinning the value of the specific engagement and partnership working with the Authority and the statutory agencies together with the purpose. It could and should mention local as well more strategic groups (such as SSWG) including anything regular with LAs.

In light of the criteria requirements around those with care needs *(criteria 1.2.5.4)* I suggest that there should be a specific reference in this section as well as more detail under

processes below and a separate SOP. This would also apply the requirement to engage actively with the Authority and

5.3 Staffing

This section does not need to be detailed but as a minimum it should reference the important part that all staff and all levels and in all roles have to play in safeguarding vulnerable service users. It should also include the organisational structure in respect of safeguarding and key roles / contacts.

It is recommended that it should refer to a Staffing Strategy which should cover issues such as : recruitment, employment checks, , professional boundaries. However, if there is no single staffing strategy and associated processes and procedures then it is recommended that this be covered in an appendix.

5.4 Training

Good, comprehensive training and continuous refreshes are at the core of an effective safeguarding system. In light of the significance of this single element I suggest that it has its own reference in the safeguarding strategy. Its significance is also cited in the schedule criteria. *(ref criteria 1.2.5.3)* / However there is also a requirement to produce a training artefact which should contain the detail of the provision and how training is to be managed. I, therefore, suggest, that this section should be focused on the strategic perspective and the principles. At the highest level:
   o The organisations view of and commitment to the importance training and development
   o Which staff will receive training
   o At a high level how the needs of individual staff will be accommodated and monitored (eg personal training plans and performance reviews)

5.5 Information Management and Sharing

The contract and criteria suggest and promote a collaborative approach and this section should reflect this and the underpinning principles of best practice in respect of

data sharing. This should also cite the requirement for complete and auditable records to be maintained.

5.6 Processes and procedures

This section needs to acknowledge that well defined and understood processes and procedures are critical to ensuring that issues relating to safeguarding vulnerable Service Users are managed by staff in a consistent, effective and efficient manner. They are also a useful measure against which to assess performance.

The Continuous Improvement philosophy which underpins the new contracts uses as one of its main tools, Standard Operating Procedures (SOPs) and the Asylum Safeguarding Hub has used these to good effect. Their creation and use, aligned to the vulnerability indicators and key actions   is recommended.

In addition to a high level statement about processes and procedures I think this would be the place where mention can be made of the specific schedule criteria and key processes (in the form of SOPs) which for most of you already exist. Eg
- o Proactive monitoring of Service Users for the purposes of identifying those at risk and in need of intervention. *(criteria 1.2.5.2)*
- o Safe, habitable and fit for purpose accommodation. *(criteria 1.2.5.4)*
- o Room sharing and relocation *(criteria 1.2.5.4)*
- o Access to healthcare *(criteria 1.2.5.4)*
- o Those with care needs and the various dimensions of this *(criteria 1.2.5.4)*

6.Key deliverables to achieve the aims of the strategy

(suggested wording)

(Name of Housing Provider) will support continued growth and development in its safeguarding regime to ensure that it delivers tangible improvements in its safeguarding of vulnerable Service Users . The table below sets out the key deliverables:

Comment

These are the key areas which are essential to delivering an effective strategy and operating model and should replicate the headings in section 5. However, it should also set out how the deliverables are to be achieved and this needs to be organization specific . More detail in action plans can support this section.