



with children, young people and adults at risk are unique and personal, work cannot effectively take place in a silo.

- Employees may have a view that the local authority in question is potentially unlikely to take specific action on the new information or change in circumstances, staff must still share the information. This is essential in order to ensure the local authority has relevant and up to date information and therefore, that Serco is undertaking effective partnership work.

Strategy meetings for any Service User either with the LA, Health, Schools or any other agency should be attended by Serco where we know about it. If invited:

- You must let the safeguarding team know if they are not already aware
- Must take record of all decisions
- Update records on the systems and email the Housing Officer, FOM, Safeguarding Team
- Will be responsible for:
  - Accessing all details of the SU's
  - Keeping all involved updated with news concerns of changes in circumstances

## 9. Contingency Accommodation

There may be occasions where Serco need to utilise contingency accommodation in addition to core Initial Accommodation provision; this would most likely be in the form of hotels. When use of such sites occurs, approved and trusted sub-contractors may be used to help facilitate the operational staffing of the sites themselves. As outlined above, all sub-contractors will receive safeguarding training and Serco will ensure there is a full understanding of safeguarding procedures that must be followed in order to ensure all service users are effectively safeguarded.

Any staff or contractors who identify any safeguarding concerns related to a Service User accommodated within contingency accommodation, will obtain as much information as possible and will then liaise with the Safeguarding Team, who will then ensure all necessary referrals are made, and provide support to operational staff managing such issues. If needed, the Safeguarding Team will attend the site to provide this support and obtain any information necessary for referrals directly from Service Users and Staff.

If higher levels of vulnerability or safeguarding concerns are known by the Home Office (UKVI) and Serco are notified ahead of a Service User being routed, placement in contingency accommodation will be avoided where at all possible. Where a safeguarding concern is identified in relation to any Service User or household already accommodated in contingency provision, Serco will seek to prioritise and expedite a move out of contingency provision into alternative accommodation a

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- referral progressing to a social work assessment
  - no further action
  - signposting to another service
  - a recommendation that the referring agency or another agency undertake an early help assessment (or that the referral remains within early help services).
  - If no response has been received within 48 hours, Safeguarding Manager must contact the local authority children's social care again and, if necessary, ask to speak to a line manager to establish progress.
  - If the local authority's response is inadequate, or doesn't sufficiently address the risk, employees must discuss this with their manager on the same day. The manager must then review the details on the same day and make a decision to take action regarding any escalation.
- For an adult: Adult social care services do not have a statutory obligation to respond within a specified timeframe. Local response timeframe targets may operate; these are available on the individual local authority Safeguarding Adult Board website. Responses may include:
    - No further action
    - An enquiry under Section 42 of the Care Act (refer to procedure 3.9, 'Working with adult services')
    - Where the circumstances are deemed not to trigger the Section 42 safeguarding duty, the local authority may choose to carry out proportionate safeguarding enquiries in order to promote the adult's wellbeing, and to support preventative action. This could include signposting.
    - If no response has been received within 48 hours, the Safeguarding Manager must contact the local authority adult's social care again and, if necessary, ask to speak to a line manager to establish progress.
    - If the local authority's response is inadequate, or doesn't sufficiently address the risk of abuse, employees must discuss this with their manager on the same day. The manager must then review the details of the situation on the same day and make a decision to take action regarding any escalation required
- Making referrals to child in need or early intervention services occur in cases where a local authority children's service decides that a child is not at risk of abuse, consideration must be made about whether other services are required. Employees must be familiar with the services on offer from a range of agencies, including how these are accessed in the relevant local area.
    - Any referral or signposting to other agencies for help and support for a child and family must be recorded on AORA.
    - It is vitally important that all employees work collaboratively and transparently with relevant social care services, regardless of their role.
    - Employee's active involvement in conversations, meetings, and individual risk management or strategy development adds depth and detail to statutory processes. While employee's relationships

- Safeguarding concerns should be recorded as soon as possible, employees must factually record on AORA what the Service User has told them (in the child or adult's own words) or what the employee has observed. Employees must include the date, time, place and observations of behaviour.
- Employees must not contact any individual about whom an allegation or concern is being raised. This could be putting the person making the allegations in serious danger, for example, where domestic violence is taking place.

Making a referral to the local authority must be made on the same day of notification where harm or risk of harm has been identified. This can be done by either the Field Operation Teams or Safeguarding but both should be aware and where possible done in conjunction. If concerns arise out of hours, referrals must be made to the local authority out of hours service by the staff member that was first made aware.

- For a child: Employees must make referrals to the local authority children's social care services, following local procedures. Where possible, employees must discuss their concerns with the child's parent, and an agreement should be sought for a referral to the local authority children's social care. Employees must only do this if it does not increase risk to the child (through either delay, or the parent's possible actions or reactions). If employees decide not to seek parental permission before making a referral to children's social care, they must clearly record this along with reasons. This must also be confirmed in the referral to children's social care
- For an adult: If the adult consents to safeguarding procedures and a referral, employees must take action on the same working day that the concerns were noted and consent obtained. If the adult does not consent to contacting other agencies, and has the mental capacity to make that decision, employees must provide information and advice to the adult. This must, where appropriate, include a summary of the concerns and advice of other services that the adult may choose to access.

In order to assess mental capacity of a child or adult, employees will need to involve family, friends, carers, or other professionals and should make clear in referrals that there is an impairment of, or disturbance in the functioning of a person's mind or brain. This could be due to long-term conditions such as mental illness, dementia, or learning disability, or more temporary states such as confusion, unconsciousness, or the effects of drugs or alcohol. A person is unable to make their own decision if they cannot do one or more of the following:

- understand information given to them
- retain that information long enough to be able to make the decision
- weigh up the information available to make the decision
- communicate their decision – this could be by talking, using sign language, or even simple muscle movements such as blinking an eye or squeezing a hand.

A referral without consent must be made in cases where:

- there is an emergency or life-threatening situation
- other people are, or may be, at risk – including children
- sharing the information could prevent a serious crime
- a serious crime has been committed.

Referral responses: What to expect from the local authority.

- For a child: Children's social care services are required to provide referrers with a response within 24 hours of receiving a referral and acknowledge receipt to the referrer. Responses may include:

- If an employee believes a child or adult to be at immediate risk of harm or abuse, and/or a criminal offence is taking place, they must take immediate steps to protect that person by calling 999. Employees must then contact their line manager to let them know what has happened and to take advice on next steps.
- If an emergency arises out of hours, employees must contact the emergency services and then the relevant manager who is on call.
- Employees must record their safeguarding concerns and actions on AORA in line with the timescales set within incident reporting process. If there is any barrier to being able to do this, employees must discuss this with their manager on the same day, to agree who will make the record.
- If there is no immediate risk of harm, employees must consult with a line manager and the safeguarding team, as soon as possible, on the same working day of the safeguarding concern.
- If there are concerns that a child is, or has been, at risk of abuse, employees must make a referral on the same working day to the local authority children's services in the area where the child is living (or is found).
- Employees must take guidance from their manager as needed.
- Employees must discuss safeguarding concerns for an adult with their manager. Employees and managers must consider the safeguarding concerns and the adult's individual circumstances in order to decide if a referral is warranted, including a consideration of:
  - Empowerment – what does the person want? What rights need to be respected? Is there a duty to act, are others at risk of harm?
  - Protection – is this person an adult at risk? What support do they need? Is capacity an issue? Should others (such as a carer) be involved?
  - Proportionality – have risks been weighed up? Does the nature of the concern require referral through multi-agency procedures?
  - Partnership – what is the view of others involved? How do multi-agency procedures apply?
  - Accountability – is there a clear rationale on which to base a decision?
- Employees may receive safeguarding concerns from external stakeholders via email or via the AIRE provider (Migrant Help).
  - Where such concerns are received via email, these must immediately be passed onto the safeguarding team via [safer@serco.com](mailto:safer@serco.com)
  - Where the concern is received via telephone, the employee must:
    - Listen to the concern
    - As soon as possible during the call, advise the caller that their concern will be passed onto safeguarding team
    - Take the caller's contact details and send these to the safeguarding team via [safer@serco.com](mailto:safer@serco.com)
    - Always confirm with the safeguarding team via a phone call that they have received the information

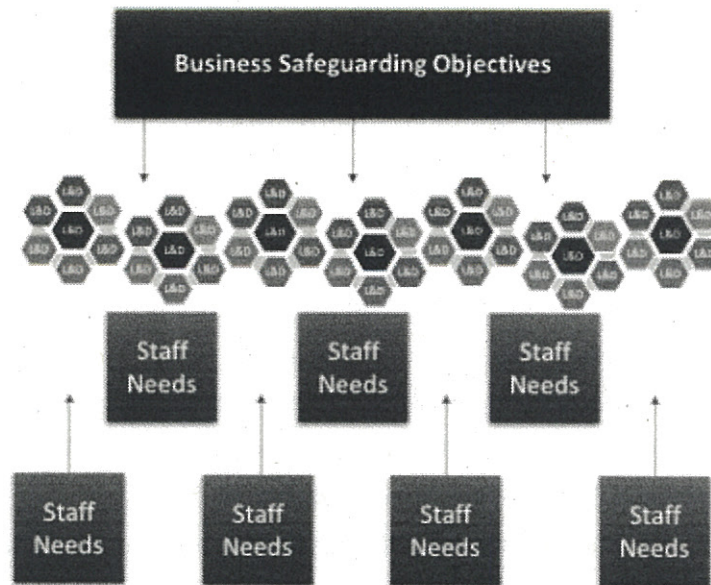
Managers are responsible for fostering a safeguarding culture and play an important role in encouraging and facilitating staff involvement in safeguarding activities.

## 8. Guidance

There is individual guidance for each vulnerability in the processes however below details the overarching principles if an employee is informed about or is concerned about a Service User, and the steps they must follow. These align with and support the [Lone Working and Personal Safety Policy](#) and [Potentially Dangerous Situation and Incident Reporting Policy](#). If when following the below guidance and the detailed process for the vulnerability a decision is taken to relocate any Service Users the [Emergency Relocation Process](#) must be followed.

- Always place the child or adult's welfare and interests as the paramount consideration.
- Safeguarding team will use a person-led and outcome-focused approach.
- Employees must talk with the child, young person, or adult at risk about how best to respond to their safeguarding situation in a way that enhances their involvement, control, and choice throughout the safeguarding process.
- Employees will listen carefully and actively to the person. Let the person guide the pace and remember their ability to recount their issues and concerns will depend on age, culture, language and communication skills, and disability.
- Do not show shock at what is being said. This may discourage the child or adult from talking, as they may feel you are unable to cope with what they're saying, or perhaps that you're thinking badly of them.
- Do not investigate. If anything needs to be clarified in order to understand the safeguarding risk, ask clear, open questions such 'what, when, who, how, where' questions or 'do you want to tell me anything else?'
- Remain calm and reassure the person that they have done the right thing by talking to you.
- Never promise to keep a secret or confidentiality. It is important that this fact, and its implications of transparency and reporting, are emphasised in early and ongoing conversations. Also make it clear that although we have to tell the Home Office it will not negatively affect their asylum claim.
- Ensure the child or adult at risk understands what will happen next with their information.
- Employees have a duty to ensure that the information is passed on in order to keep the Service User safe.
  - If a child requests confidentiality, employees must explain our duty of care, for example, 'I'm really concerned about what you have told me, and I have a responsibility to ensure that you are safe'.
  - If the person disclosing is an adult, employees have a duty to pass on information if someone is at immediate risk of harm, and to encourage and support the adult to share information and seek support. Employees must ask for the adult's consent to take up their concerns. If the adult does not agree, or if employees do not believe that the adult has capacity to make a decision about consent, they must consult with the Safeguarding Manager and Field Operations Manager.
- As concerns arise, employees must talk to their manager or, if they're not available, another relevant manager.

## 7. Training



### *Learning and Development Strategy – Why?*

To ensure that staff are able: to understand their duty of care towards Services Users whilst carrying out contractual business and; to discharge their safeguarding responsibilities at all times with the most appropriate skills and competencies.

### *Learning and Development Strategy – How?*

The Learning and Development Strategy supports the business by linking L&D activities to its strategic Safeguarding principles and objectives. It establishes priorities and plans around learning needs, mandated not only by the business, but also by perceived gaps in knowledge amongst the staff.

The business' safeguarding strategy will be objectively linked to staff personal development plans with performance monitored against safeguarding responsibilities and requirements.

### *Learning and Development Strategy – What, When?*

The learning and development offering is constantly reviewed and refreshed through the 4 phases of the Learning Needs Cycle, which incorporate:

1. Learning Needs Analysis
2. Design intervention
3. Deliver intervention
4. Evaluate results and identify gaps

### *Learning and Development Strategy – Who?*

All members of staff working on the AASC contract receive safeguarding awareness training, with a more focused and concentrated learning intervention directed at staff whose roles are Service User facing. Individual members of staff agree to undertake all agreed development activities and goals to ensure compliance with the business' safeguarding objectives.

**LGBT+** - An individual that identifies as lesbian, gay, bisexual, transgender, queer, questioning, intersex, asexual or pansexual.

**Age Dispute** - When an asylum seeker or migrant claims to be a child and their claimed age is doubted by the Home Office or they claim to be an adult but are suspected to be a child.

**Victim of Torture** - Anyone who has experienced any form of torture, which is defined as "any act by which severe pain and suffering, whether physical or mental is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person committed or is suspected of having committed, or intimidating or coercing him or a third person".

**Unaccompanied Minor** - Those who have been separated from both parents and other relatives and are not being cared for by an adult who, by law or custom, is responsible for doing so.

**Proof of Kinship/Family Reunion** - Refugee family reunion is the legal process by which a recognised refugee (or person with humanitarian protection) can be reunited with their pre-flight dependent family members.

**Food and Fluid Refusal** - Includes partial or total rejection of foods and/or fluids.

**Homelessness** - You are homeless if you have nowhere to stay and are living on the streets, but you can be homeless even if you have a roof over your head i.e. living with friends, in a hostel or at risk of violence or abuse in your home.

**Destitution** - Destitution means going without the bare essentials that people need. That's a home, food, heating, lighting, clothing, shoes and basic toiletries.

**Allegation of Historic Child Abuse** - Any allegations of child abuse, which occurred when the victim was a child, and which have been made when the victim is an adult.

## 6. Contact details

The main contact within Serco for any safeguarding concerns on AASC are the Safeguarding Team. They can be contacted via email at [serco.aasc@serco.com](mailto:serco.aasc@serco.com). This inbox is monitored by the Safeguarding Officers and Safeguarding Managers, Monday to Friday 9am till 5pm (excluding bank holidays).

The Housing Officer and Field Operations Manager for the property where the Service User is accommodated will also be made aware of any safeguarding concerns.

If there are emergencies outside of these hours should be reported to appropriate emergency service (Police, Fire, Ambulance) and/or Migrant Help.

The Home Office Safeguarding Hubs should also be informed.

North West:

Midlands and East of England:

For each vulnerability there is a list of contacts that can support national, regionally and locally.



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**Child Protection/Risk/Neglect** - Serious risk of harm may arise from a single event or a series of concerns over time. Child abuse is any act by parents or caregivers that puts a child or young person's physical or emotional health or development in danger. Neglect is an ongoing failure to meet a child's basic needs.

**Learning Disability** - A reduced intellectual ability and difficulty with everyday activities – for example household tasks, socialising or managing money – which affects someone for their whole life.

**Substance Abuse** - Harmful or hazardous use of psychoactive substances, including alcohol and illicit drugs.

**Pregnancy** - The state of carrying a developing embryo or fetus within the female body.

**FGM (Female Genital Mutilation)** - A procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It's also known as female circumcision or cutting, and by other terms, such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

**Victim of Assault** – A person who has been (or at the threat of being) physically harmed or had unwanted physical contact. It can also include threatening words or the threat of physical harm such as a raised fist.

**Victim of Hate Crime** – A person who has had hostility towards them either because of disability, race, religion, sexual orientation or transgender identity.

**Forced Marriage** - Where someone is forced to marry against their will. They can happen in secret and can also be planned by parents, family or religious leaders. Victims of forced marriage may be subjected to threats, physical violence or sexual violence, or psychological or emotional pressure, including being made to feel like they're bringing shame on their family if they do not proceed.

**Vulnerable to Radicalisation** - Individuals at risk of being groomed into extreme ideologies or terrorist activity before any crimes are committed.

**Vulnerable to Exploitation** – Individuals at risk of deliberately being maltreated, manipulated or another person abusing power and control over them. It is taking advantage of another person or situation usually, but not always, for personal gain. It includes slavery, being controlled by a person or a group, forced labour, domestic violence and abuse, sexual violence and abuse and human trafficking.

**National Security Threat** - Main threats to national security are terrorism, espionage, cyber threats and the proliferation of weapons of mass destruction, many of which impact on the UK's national infrastructure.

**Potential Victim of Modern Slavery** – Individuals at risk of recruitment, movement or harbouring through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

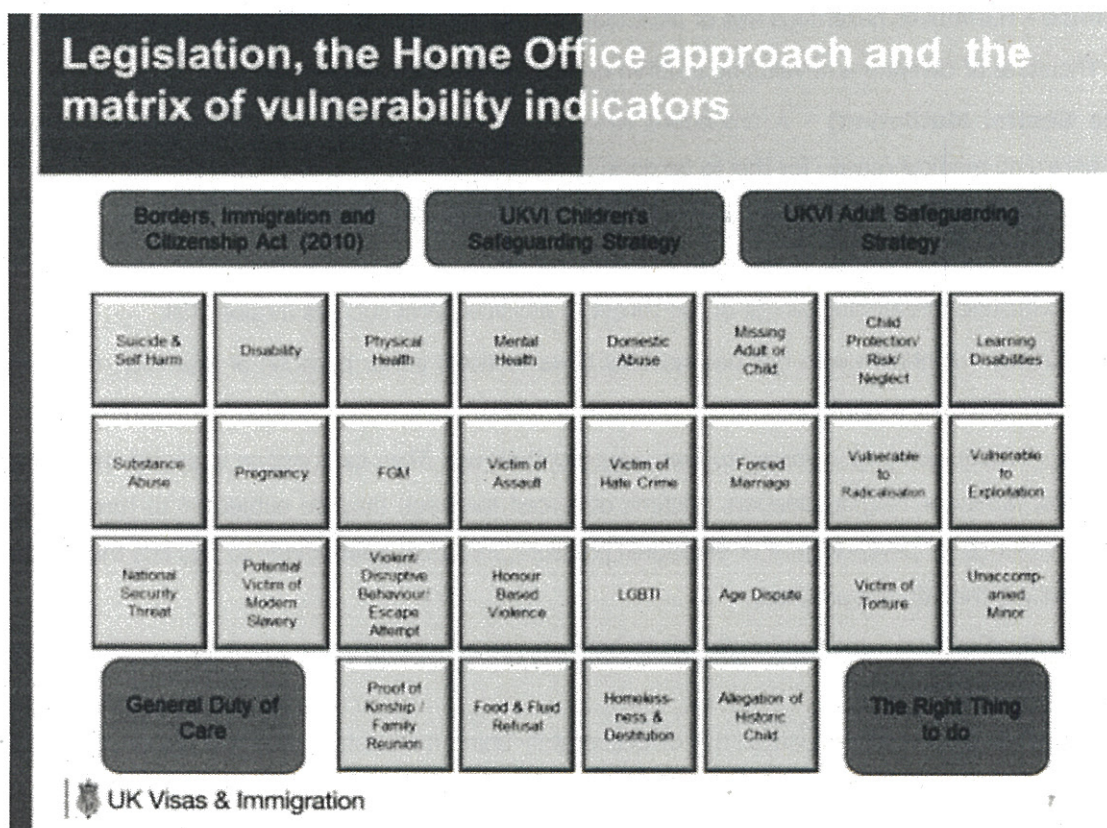
**Violent or Disruptive Behaviour** – Any behaviour by an individual that threatens or actually harms or injures others or destroys property.

**Honour Based Violence** - A violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. This includes becoming involved with a boyfriend or girlfriend from a different culture or religion, wanting to get out of an arranged marriage, wanting to get out of a forced marriage, wearing clothes or taking part in activities that might not be considered traditional within a particular culture.

## 5. Key terms and definitions

Safeguarding both adults and children at risk means protecting their right to live in safety and free from abuse and neglect (Care Act 2014 Statutory Guidance).

Vulnerability is defined for the purposes of this Policy as a person, child or adult, who is, or may fall within the vulnerability matrix of indicators as follows:



**Self-Harm** - When somebody intentionally damages or injures their body. It's usually a way of coping with or expressing overwhelming emotional distress.

**Suicide** - The act of intentionally causing one's own death

**Disability** - A physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities.

**Physical Health** – Can be a short or long-term problem that has a negative impact on their normal daily activities. A long-term condition is a health problem that requires ongoing management over a period of years or decades.

**Mental Health** - A person's condition with regard to their psychological and emotional well-being.

**Domestic Abuse** - Any incident of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of their gender or sexuality.

**Missing adult or child** - Anyone whose whereabouts is unknown whatever the circumstances of disappearance.

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### 3. Context

Serco will ensure that all processes and procedures are up to date within the legislative framework set out by UK parliament 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

### 4. Roles and Responsibilities

Serco will keep Service Users safe by:

- Listening to SU's and respecting them
- Appointing a safeguarding team and have a director who takes lead responsibility for safeguarding at the highest level within the AASC contract leadership team.
- Write detailed safeguarding procedures.
- Ensuring all staff and contractors have a full understanding of the procedures (including delivery of necessary training) and clear mechanisms in place (e.g. supervision, governance) to ensure these safeguarding procedures are being followed.
- Ensuring all stakeholders know about the organisation's safeguarding policies and what to do if they have a concern.
- Building a safeguarding culture where staff know how they are expected to behave and feel comfortable about sharing concerns including a clear whistleblowing policy.
- Operate clear governance structures through monthly internal safeguarding board and a 6 weekly *SU Incidents Meeting* attended with the customer.
- Attendance and input at all customer ran safeguarding meetings.
- Have a Serco safeguarding board which meets to discuss those cases that need particular attention and also to learn and improve.

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There are many ways an individual could identify or raise a concern about a Service User, these include:

- During an inspection
- Whilst completing a repair at the property
- During a welfare visit
- Information received from the Authority i.e. information disclosed during interview
- Information disclosed or witnessed by another agency

Serco will ensure any vulnerability is responded to accordingly based on the individual processes of each of the vulnerabilities listed in the matrix. On each occasion of information disclosed or behaviours witnessed Serco will report to the authority.

In each of the processes there is a process map as well as definitions of each of the vulnerabilities and signs for how to spot the potential vulnerability.

Serco commit to ensuring that there is non-discriminatory practice, however we will consider the impact of the below on the individual:

- Age
- Disabilities
- Race
- Religion
- Sex
- Sexual Orientation
- Gender Reassignment
- Pregnancy & Maternity

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## 2. Aims of the Policy

Asylum Seekers are not a homogenous group but one that is diverse in its configuration and comprising a population differentiated by culture, religion, beliefs and social norms. Consequently, their social, economic and health needs cannot be addressed with a generic approach.

There are many potential risks to asylum seekers. Some Asylum Seekers may have arrived from refugee camps where there is poor sanitation and poor nutrition. They may be suffering from malnutrition and injury caused by the journey. They may have experienced high levels of psychological trauma through witnessing others dying due to high risk journeys. For some, the journey may have taken months with people moving from one unsafe country to another until they arrive in the UK. During the journey, they may have become increasingly vulnerable to risk of sexual exploitation and human trafficking. In addition to having been victims of conflict or torture and fleeing for sanctuary, they arrive with significantly different needs to the indigenous population.

Research suggests there is higher prevalence of long-term conditions and diseases compared to the indigenous population. Asylum Seekers are more likely to suffer from PTSD and poor mental health. Alongside this, the most noted problems are:

- Suicide
- Depression and anxiety
- Dental problems
- Physical trauma
- Communicable diseases
- Female Genital Mutilation (FGM)
- Human trafficking
- Chronic Diseases i.e. Chronic Obstructive Pulmonary Disease (COPD) and Cardiovascular Disease (CVD)
- Physical and sensory disabilities
- Social isolation
- Deprivation
- Acculturation
- Language barriers
- Barriers to accessing services

Serco believe that safeguarding means protecting children and adults at risk from harm, abuse and neglect. The safety and well-being of adults and children who come into contact with services that Serco provide is of the utmost importance.

This policy is for Serco staff and contractors (those that work with Service Users daily and occasionally) but also those partners who we work with externally so they can better understand how we can support and signpost. In order to do this, we ensure our staff are trained and they have the information needed to link in with other agencies who are the best equipped to help that individual. The policy is also there for Service Users so that they are safeguarded appropriately and are at the heart of the work we do.

## 1. Foreword

The following document sets out Serco's safeguarding policy for Asylum Seekers in the North West, Midlands and East of England. This policy sets out overarching processes for safeguarding, however the individual vulnerabilities as listed throughout and in the strategy, have more detail which individuals should refer to. The policy sets out the aims, objectives and responsibilities of Serco, the Authority and both statutory and non-statutory partners.

Serco commit to working in partnership with the Authority, other Providers and relevant statutory agencies to ensure that any Service User deemed to be at risk or identified as holding a safeguarding need (as categorised within the vulnerability matrix), is able to access the appropriate support they require and are entitled to in order to meet their needs effectively.

This commitment is based on a number of principles including a commitment from the Authority to ensure that any and all relevant data sharing takes place in a timely manner and enables Serco to work with the Authority and relevant agencies to plan for appropriate provision to be in place upon arrival as required. In addition to a commitment from key statutory agencies such as Local Authorities and Health to fulfil their statutory responsibilities in effectively meeting the vulnerability or care needs of any such Service Users who are dispersed within communities.

Serco are committed to providing safe and habitable accommodation for Asylum Seekers, whilst also providing guidance and support to access appropriate services which will allow them to live independently in both initial and dispersed accommodation, and in the acknowledgement that the AASC Housing Provider is not responsible for meeting the Care or Health needs of any vulnerable Service User.. This will include safeguarding vulnerable service users as outlined in the Authority's vulnerability matrix and ensuring that they are referred to the appropriate external agencies for further support.

To successfully safeguard Serco's service users, Serco will continue to develop and maintain relationships with external partners through their Stakeholder Engagement function, which includes both the Partnership and Safeguarding Teams. These will include but not be limited to Police, Health, Local Authority health, housing and social work teams, the Strategic Migration Partnerships and Non-Government Organisations (NGO's).

Serco's strategy is 'To be a trusted partner of governments, delivering superb public services, that transform outcomes and make a positive difference for our fellow citizens.' Serco's culture is based on a set of four values - Trust, Care, Innovation, Pride – these shape our business expectations in respect of individual behaviours and in turn drives how the company delivers its services. They ensure we are all working from a commonly understood base that can be consistently applied across our organisation. They guide us in our dealings with colleagues, customers, suppliers, partners, shareholders and the communities in which we serve.

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# Safeguarding Policy

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## Version Control Sheet

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## Change Control

Any requested changes to this document should be emailed to: [Redacted]