

Serco store all policies and procedures in a central location and these are all easily accessible for staff. These cover the below:

- Proactive monitoring of Service Users for the purposes of identifying those at risk and in need of intervention. (criteria 1.2.5.2)
- Safe, habitable and fit for purpose accommodation. (criteria 1.2.5.4)
- Room sharing and relocation (criteria 1.2.5.4)
- Access to healthcare (criteria 1.2.5.4)
- Those with care needs and the various dimensions of this (criteria 1.2.5.4)

7. Key Deliverables

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

1. Identify vulnerable services users in line with the vulnerability matrix.
2. Work with partners and the service user to ensure they are supported in their accommodation with Serco.
3. Provide strategic oversight at a national and regional meetings.
4. Report all relevant information to the Authority.
5. Build and develop on Serco's current processes and procedures to ensure consistent, efficient and effective management.
6. Clear auditable records for information management and sharing for staff, external partners and the Authority.
7. Feeding into strategic and localised safeguarding structures to build on and develop new partnerships for proactive engagement.
8. New safeguarding training for staff so that they are able to support the strategy and deliver the Serco are committed to provide.
9. Provide a service that delivers in line with our core values Trust, Pride, Care and Innovation.
10. Have a clear internal reporting structure to support clear escalations and accountability for safeguarding issues within the leadership and management functions.

8. The responsibilities of the Authority

In this section we would expect the Authority to list their responsibilities in relation to successfully safeguarding vulnerable Service Users.

of staff agree to undertake all agreed development activities and goals to ensure compliance with the business' safeguarding objectives.

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

6.5 Information Management and Sharing

Serco fully understand the value of clear and auditable information. In line with contractual obligations for monthly reporting; Serco will produce and maintain clear and concise records of any information that raises concern that a member of staff or SU may be at risk of any of the vulnerabilities outlined in the vulnerability matrix.

This information will be made readily available in a collaborative spirit to the authority or interested party through a Freedom of Information request.

Serco acknowledges the Authority as the data owner and will not share without the explicit written consent of the authority.

Serco expect that all parties involved will share all relevant information in a timely manner as to allow the effective safeguarding of SUs and Staff.

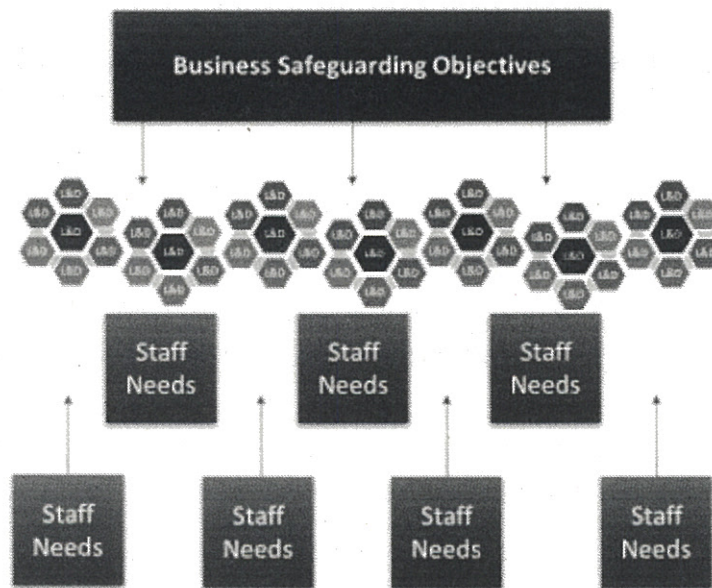
The company have implemented technical and organisational measures to ensure, and demonstrate, compliance with the Data Protection Act 2018 (GDPR). Please refer to [GDPR - Notice to Staff - What Data Can I Share](#).

6.6 Processes and Procedures

The current processes and procedures are under review so that they can align with the new AASC contractual requirements and Serco's structural changes (the new Target operating Model including the Safeguarding Manager and Officers). This will allow for more robust accountability and reporting whilst also supporting the needs of our vulnerable Service Users. By reviewing our processes and procedures we will ensure that our staff manage any safeguarding issues in a consistent, effective and efficient manner. This will allow us to also monitor performance and where needed improve the service we provide going forward.

Serco have a strong ethos of continuous improvement and are working towards being a leader in Operational Excellence. All managers by 2020 will have attended and completed 'Yellow Belt' training which will support this and empower them to make those continuous improvements that are needed to provide a cost effective service to the Authority.

6.4 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

Serco conduct robust employment and security checks in every instance, with a requirement for all staff working on the AASC contract to be DBS and CTC cleared.

Serco have a clear, concise and detailed Code of Conduct that all staff must adhere to, with clarity on expectations on profession conduct. Along with a documented version of the Code of Conduct which is provided to all staff there is a video version covering key points that is accessible on the internet at any time. Serco take pride in their ethos in the context and expectations on staff, and as such publicise both on a the publicly available internet page. This page includes a downloadable version of the Code for both staff and contractors in various languages.

Serco also ensure e-learning is completed by all staff on the code itself, with a knowledge-based test required to pass before course completion.

Serco AASC have clear escalation and accountability for safeguarding issues within the Leadership and Management function. This includes reporting through Incidents Reports and completing monthly reports which are submitted to the Authority. In particularly Serco commit to liaising with the Authorities safeguarding hubs and service delivery managers.

All members of the Contract Leadership Team (CLT) and Senior Management Team (SMT) have a responsibility to ensure that their respective teams deliver services that align with Serco's values; Trust, Care, Innovation and Pride. They will also review cases and commit to adapting working practices where needed to suit the individual's needs.

Operational Managers will support front line staff to deliver an effective service that safeguard any and all individuals that need it, considering the vulnerabilities indicated in the matrix. They will act as an escalation point to CLT and SMT.

Stakeholder Engagement function including the Partnership Managers, Safeguarding Manager and Regional Safeguarding Officers will support operational staff to refer to key agencies and establish good working relationships. They will act as a single point of contact for external agencies where needed but will refer to the AIRE provider where necessary.

See appendix A for Serco's structure.

Within training and processes, staff will have clear guidance on dealing with cases at an operational level under criteria (1.2.5.4). This will be managed within performance and compliance checks and escalated where needed. Within this framework Serco will liaise with the Authority, statutory services and NGO's to contribute to case reviews for vulnerable Service Users. Serco will expect the Authority to instigate these at key points in the Service Users journey i.e. discontinuation.

6.2 Engagement and Partnership Working

Serco have a well-established and robust structure in respect of engagement and partnership working at all levels. This is formally consolidated within the Stakeholder Engagement function within the business (which includes a designated Safeguarding function), however is a commitment at both a Leadership and Operational level. Serco commits to continue to deliver this in line with our core values of Trust, Pride, Care and Innovation.

Designated Partnership Management and Safeguarding Management functions provide proactive engagement at a strategic, operational and community-based level with both statutory stakeholders and third sector partners. This will continue to allow for transparency with the Authority, it's partners and for Serco's internal compliance. Doing this will ensure the best outcome for the Service User as their will be a joint working solution which will allow for challenge and support between agencies.

Strategic:

We currently work alongside a number of strategic partners including those mentioned below. This allows an oversight at a regional level (i.e. North West, Midlands and East of England) and nationally. Serco will also work to establish and contribute to new forums such as an operational working group.

- Safeguarding Working Group
- SMP Executive Boards
- SMP Regional Group meetings
- NHS/CCG meets
- HSCP meetings

Locality Based:

Our Partnership Managers are assigned local areas to ensure a consistent approach between authorities and meet regularly with the Head of Stakeholder Engagement to promote best practice and information sharing across the regions. The new Safeguarding Team will begin engagement and partnership working in the coming weeks, building on the already established relationships by meeting with the below.

- Local statutory forums e.g. Local Authority, Police, Health – these partners will usually attend the below meetings but where needed they also meet strategically and individually with Serco for individual cases.
- Locality based Multi-Agency Forums – these meet regularly but vary between Local Authorities. Although specific cases are not discussed at these meetings it allows for wider conversations about local, regional and national issues.
- NGO engagement – these vary across regions but provide invaluable support to Asylum Seekers, Serco and the Authority.

6.3 Staffing

It is Serco's position that Safeguarding is everybody's business, and this is a culture that is fully embedded within all staff employed on the delivery of the AASC contract.

6. How the Aims of the Strategy will be Delivered

6.1 Governance

Strategic oversight:

Serco will align with national and regional strategic meetings. This includes but is not limited to relevant SMP governance forums, Senior Safeguarding Groups, Regional and Sub Regional health and social care meetings. The aim of these meetings is to contribute to the overarching immigration strategy, having knowledge of and aligning to legislation as detailed above. Serco will also use the strategic meeting to shape services, policies, share best practice and identify any gaps in the policies authorities, statutory services and internally.

The Contract Leadership Team hold the overall responsibility for ensuring the adherence to safeguarding policies and processes throughout their directorate. This scope reaches from operational delivery to ongoing review of systems, reporting and training. The operational accountability is the responsibility of each and every employee and monitored in line with organisational hierarchy for their responses to cases of vulnerable Sus. The safeguarding team will play both an advisory role and the role of a critical friend when reviewing cases with high level cases being reviewed at a newly established internal Safeguarding Board.

Monthly reports are collated based on the SU's that are referred into the Safeguarding Team. The figures show how many of each vulnerability have occurred that month, where the referral came from, what local authority they are based in and how many are singles or families. These reports are reviewed internally and reported back to the authority. Both in the aim to identify trends and areas for improvement.

Serco are committed to attend a joint meeting with the authority periodically to review on going cases as well as ad hoc case reviews when a safeguarding issue arises that would warrant a joint approach.

Serco will continue to feed in and take away actions at the Safeguarding working group.

Tactical oversight:

Serco commits to feeding into localised safeguarding structures to support Service Users in the community and ensure their safety and wellbeing. This may include but not limited to referring into localised community schemes, referrals to the child and adult safeguarding teams, MARAC and TAF. The Partnership and Safeguarding teams will work with the local authorities to shape services where possible and support with developments in their localised structures.

Serco commits to reporting all relevant information to the authority. Within Serco's processes and procedures there will be clear audit records and escalation routes. Within reporting criteria set out in the contract all audit materials will be made available when request by the authority.

The Stakeholder Engagement Manager and Safeguarding Manager are responsible for the tactical oversight and will lead on the Serco Safeguarding Board. They will periodically review and lead on any improvements needed to the safeguarding function within Serco

Operational case oversight:

5. The Legal Context of Safeguarding and Home Office Policy

5.1 Legislation

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

5.2 Home Office Policy

It is the responsibility of Serco 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 Serco 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)

5.2.1

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 Serco.

5.2.2

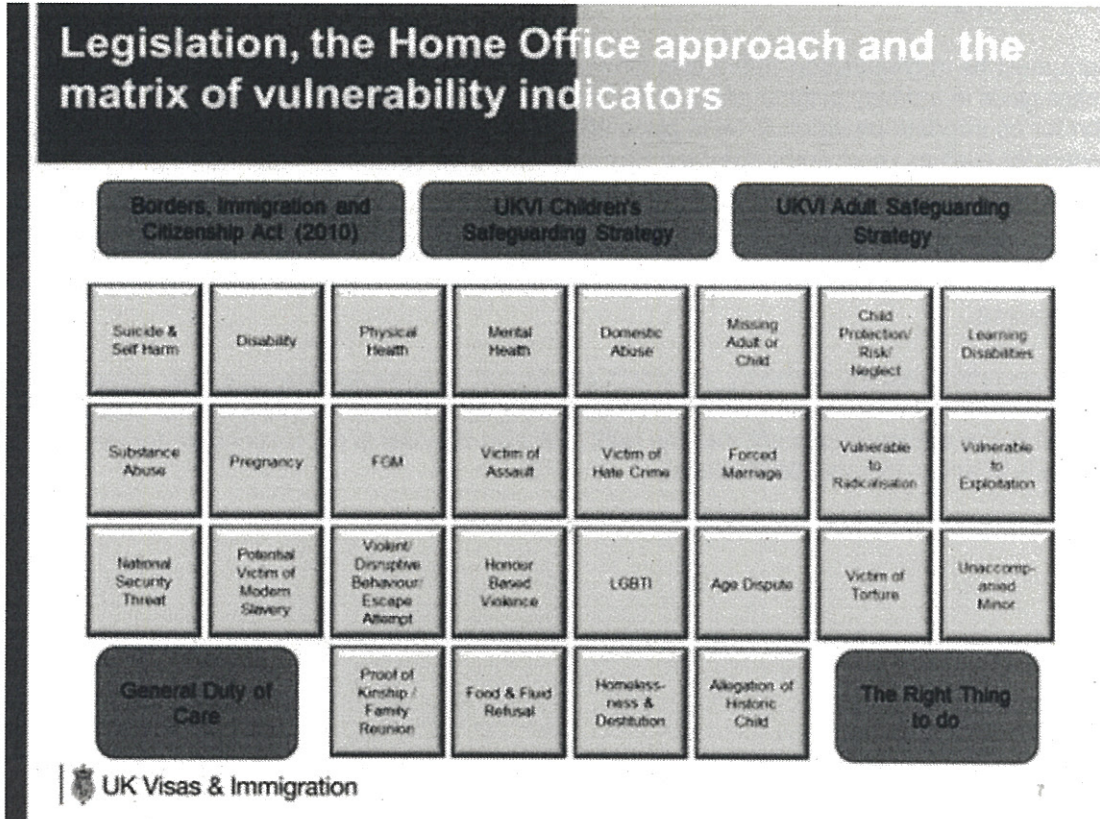
In addition Serco will align its own policy, guidance and procedures with the Authority's strategy and approach. This consists of:

- UKVI safeguarding children strategy
- UKVI safeguarding adult's strategy
- Indicators of vulnerability (see Appendix 2)

However, the Provider will also work with key statutory stakeholders and internal colleagues to ensure that any internal Safeguarding policies and procedures consider regional contexts, challenges and relationships.

4. Defining Vulnerability

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



This list is not exhaustive.

This strategy defines a child as a person who has not yet reached their 18th birthday, and an adult as a person aged 18 years or above.

3. Provider Commitment

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 must be in conjunction with a commitment from the Authority to ensure that any and all relevant data sharing takes place in a timely manner and enables the provider 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.

It is the expectation of Serco as the housing provider that Migrant Help as the AIRE provider under their contractual obligations in respect of Welfare provision and Outreach, will provide proactive support, signposting and referrals as required.

There is also an expectation that the Authority, Providers and Statutory Agencies provide a clear commitment in working together and fulfilling their responsibilities (including clear escalation, accountability and case conference commitments), and in the acknowledgement that the AASC Housing Provider is not responsible for meeting the Care or Health needs of any vulnerable Service User.

2. Aims of the Strategy

This strategy acknowledges that some service users may have specific needs or be at risk whilst they are with the care of Serco (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 Serco.
- 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 wellbeing. (criteria 1.2.5.4)
- To support the wellbeing 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 wellbeing of vulnerable Service Users.
- To ensure that there is governance and accountability for the work undertaken by the Authority, Providers and relevant statutory agencies in the safeguarding context, in order to hold all to account on their respective responsibilities.
- Adoption of a continuous improvement approach.

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

Any individual in receipt of s.4, s.95 or s.98 support & accommodation under the Asylum Accommodation & Support Contract (AASC).

1. Foreword

The following document sets out Serco's safeguarding strategy for Asylum Seekers in the North West, Midlands and East of England. This strategy does not set out procedural detail although it will be referenced throughout, but it will set out the aims, objectives and responsibilities of the Serco, the Authority and partners.

Serco are committed to providing safe and habitable accommodation for Asylum Seekers whilst also ensuring they are accessing appropriate services which will allow them to live independently in both initial and dispersed accommodation. This will include safeguarding vulnerable service users as outlined in the Authorities vulnerability matrix and ensuring that they are referred to the appropriate external partners for further support.

To deliver this strategy Serco will continue to develop and retain relationships with external partners through their Partnership function and Safeguarding Team. These will include Police, Health, the Strategic Migration Partnerships and Non-Government Organisations (NGO's).

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Safeguarding Strategy

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Change Control

Any requested changes to this document should be emailed to: serco@serco.com