



Home Office

# Customer Services Safeguarding Strategy

Version 2.0

Safeguarding of Adults and Children 2021-2025

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# About this guidance

## Purpose of strategy

This document guidance is designed to assist staff to understand their responsibilities in regard to safeguarding adults and children who are engaging with the services or compliance regimes of Customer Services.

## Target audience

This strategy applies to all Customer Services staff, not just those in customer-facing roles or those assigned to safeguarding casework. The contents of this document also apply to all duties undertaken by agency staff and contracted partners.

This broad target audience may include staff with a diverse range of skills and experience levels or specific safeguarding responsibilities. Where any specific instruction applies specifically to any certain role-holder or unit or within a context specific scenario, this will be highlighted in the narrative. Unless otherwise stated, this instruction will have universal applicability to all staff.

## Strategy objectives

This guidance aims to deliver the following objectives:

- to provide practical instruction for staff to safely and effectively respond to customers vulnerabilities when such information is presented or otherwise comes to light
- to facilitate early and appropriate intervention so that those who may be vulnerable, or at risk of increased vulnerability as a result of their circumstances are protected and appropriately supported by Customer Services and UK wide statutory agencies

## Scope and remit of guidance

This guidance establishes and sets out the limits of individual responsibilities. Staff and contractors who carry out immigration functions are not expected to be counsellors or clinicians with medical knowledge or to be able to recognise or diagnose medical conditions.

This guidance is not intended to prevent staff from undertaking their normal duties in accordance with departmental goals, but it is intended that they will undertake those duties with an awareness of vulnerabilities.

The actions detailed in this document are not restricted to, or only triggered by situations in which an immigration process, decision or action is either being enacted or is pending. Nor are those actions restricted to, or triggered only, by the perceived impact of any such immigration process, decision or action on the individual concerned.

## Contacts

If you have any questions about the guidance and your line manager or senior caseworker cannot help you or you think that the guidance has factual errors then email Robert Warrington of the Safeguarding Strategy Team.

If you notice any formatting errors in this guidance (broken links, spelling mistakes and so on) or have any comments about the layout or navigability of the guidance then you can email the Guidance Rules and Forms team.

## Publication

Below is information on when this version of the guidance was published:

- version **2.0**
- published for Home Office staff on **15 July 2024**

## Changes from last version of this guidance

Details of 'Homelessness, including rough sleeping' added as a vulnerability.

### Related content

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## Purpose, vision, mission and aims

Our purpose in Customer Services is to make millions of decisions every year about who has the right to enter or stay in the country, with a firm emphasis on national security and a culture of customer satisfaction, thereby keeping the UK safe and secure. Our vision is to be a world-leading immigration service, working for a safe and prosperous United Kingdom.

Customer Services contributes to the Home Office vision for a United Kingdom that is secure and prosperous; where citizens, residents and visitors are safe, and feel safe to go about their lawful business; and where institutions at all levels of society uphold rights, liberties and the rule of law. The Home Office values are the foundation of the culture we want in the Home Office and are embedded within the organisations programme of Transformational Change:

- respectful - we treat everyone fairly, respecting individual perspectives and valuing and embracing our differences to create an inclusive environment
- courageous - we are outward looking and professionally curious, testing new ideas while encouraging challenge and being bold in our pursuit of delivering outcomes for the public
- compassionate - we act ethically, with honesty, care, and sensitivity, seeking to understand the realities and perspectives of the people we serve to build trust and confidence
- collaborative - we work as one team, listening to and supporting each other and our stakeholders, working across boundaries to improve outcomes for the public

We seek to deliver in a way that protects host communities and local services as well as maximising the value for money for the British taxpayer. We seek to foster and embody a whole of society approach to addressing the issues of how refugees and other vulnerable people coming through the system are safeguarded where practically possible overseas and in the UK. Because the reach of our mission is from global to local we work on an ethos of collaboration and co-production with key organisations both in the UK and overseas: including United Nations High Commissioner for Refugees (UNHCR), International Organisation for Migration (IOM), foreign governments as well as Local Authorities, Devolved Administrations, refugee/migrant charities, the private sector, faith groups, human trafficking and exploitation organisations, diaspora groups, the voluntary sector and civil society as a whole.

This strategy has been prepared in support of our safeguarding mission. To ensure it is well informed we have sought input from local authorities, health professionals, non government organisations, and charity colleagues. It is an integral step to delivering our commitments within the Cross-Government Modern Slavery Strategy, under the Protect strand - doing our part to ensure those who are vulnerable are protected and improving detection of victims. It also complements the Customer Services Customer Strategy through ensuring we make the right decision and provide the right service by considering the section 55 duty in relation to children; the

## Customer Services Safeguarding Strategy

Security Strategy by supporting the Protect objective to protect people at risk of becoming victims; and is linked to the Customer Services Operating Mandate.

This strategy reflects the Home Office commitment that Customer Services, Immigration Enforcement and Border Force will consistently consider the safeguarding of customers and staff when shaping business design. Customer Services is committed to safeguarding those who are at risk and ensuring our services are delivered in a manner that respects those unable to take care of themselves or protect themselves from significant harm or exploitation. When discussing customers in this strategy we are referring to customers that are not detained for immigration purposes, separate arrangements exist for those in detention.

Our overarching aims in setting out this strategy are:

- ensuring that adults and children at risk are identified and protected
- improving the experience of vulnerable customers within the Immigration process from the point of application through decision to conclusion
- ensuring that all Customer Services staff, in the UK and overseas, understand that everybody has a role to play in safeguarding the vulnerable
- raising and maintaining awareness amongst Customer Services staff of the various strands of vulnerability so that they can identify who need assistance
- embedding and maintaining safeguarding practice and procedures across all Customer Services Operations, whether based overseas or in the UK, and ensuring compliance with policies
- ensuring that Customer Services works in partnership through engagement with relevant stakeholders, both in the UK and overseas, including learning from those with lived experience and experts by experience

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## Customer Services safeguarding vision

To be safe from abuse and neglect is a basic need for all people. Being or feeling unsafe undermines relationships, confidence and self-belief and can impact negatively on future life options. The development of an overarching strategy for 2021-2025 incorporating safeguarding Adults and Children will further enable Customer Services to ensure a consistent approach in safeguarding those in need of protection. Safeguarding is a responsibility of all who engage with the public, although not everyone engaged with the public will have a statutory responsibility for intervention. Those who understand why safeguarding is important, and who have had the training to recognise risk factors, can collaborate and take actions to ensure that vulnerable people receive the support and protection they need.

Safeguarding is a consistent feature of strategic plans at all levels within the Home Office. The Home Office single departmental plan details that we will pool our expertise and experience of safeguarding to share best practice on protecting the most vulnerable people in our society. In setting our transformational goals Customer Services commits to “safeguard vulnerable people and their host communities through developing strong relationships with local authorities, enhancing our existing safeguarding mechanisms and delivering resettlement programmes”.

Whilst Customer Services staff roles deal with guidelines, rules, and policy it is important that all officers and business units keep focus on the person behind the case. By placing the customer at the heart of our delivery and remembering that a human being sits behind every case file and reference number we can deliver an empathetic service in accordance with the Civil Service values of integrity honesty, objectivity, and impartiality. Ensuring customers are aware of their right to access UK services, ensuring they feel valued and respected and are supported to represent their needs or rights whilst in the UK will help support individual customers and the communities in which they reside.

This strategy applies to all Customer Services staff, whether customer facing or not, as well as all agency staff, contracted partners, and their staff whether overseas or in the UK. This strategy will assist all in reflecting on the individual needs of our customers and help embed a culture of professional curiosity in our services. It is not intended to prevent staff from undertaking their normal duties in accordance with departmental goals, but it is intended that they will undertake those duties with awareness of and making allowance for vulnerabilities.

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# Safeguarding

## What is safeguarding?

The term safeguarding is used to describe how organisations protect adults and children from abuse or neglect. Robust safeguarding procedures help protect those who may be vulnerable, or at risk of increased vulnerability as a result of their circumstances. Delivery of effective safeguarding is supported by setting out a coherent strategy, collaborating across public services to identify those at risk and putting steps in place to help protect customers in need.

## Legal responsibilities

There is no one piece of UK wide safeguarding legislation that applies to all 4 UK nations, but there is a range of legislation addressing common themes and broad responsibilities of public authorities. Present throughout the various acts, and all supporting guidance, is the understanding that enacting policies and procedures to keep vulnerable people safe is a collective responsibility of Government and society.

When inspecting safeguarding in the Home Office the Independent Chief Inspector (ICIBI) noted that there is no clear, single legal definition of safeguarding responsibility for Home Office staff delivering services to non-detained customers, except in relation to the safeguarding of children. In common law duty of care is linked to the idea of a standard of conduct that might reasonably be expected in the circumstances. Although what might reasonably be expected from any organisation is open to interpretation the Parliamentary and Health Service Ombudsman (PHSO) helpfully states that public bodies: “should follow their own policy and procedural guidance, whether published or internal” and “should provide effective services with appropriately trained and competent staff”

The statutory agencies responsible for safeguarding adults and children are local authorities, health and police, who share responsibility and accountability. Customer Services however has an important role to play in identifying those at risk and sharing relevant information with statutory agencies so they can fulfil their legal responsibilities. In delivering our services to customers Customer Services must ensure that general standards support collective safeguarding responsibilities and individual customer needs are considered and reasonable adjustments made to ensure inclusivity, for example removing barriers cause by digital exclusion.

## Safeguarding of adults

Adult Safeguarding is the term used for activities which prevent harm from taking place and which protect adults at risk (where harm has occurred or is likely to occur without intervention).

An ‘adult at risk of harm’ is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their personal characteristics and/or life circumstances. The Care Act 2014 establishes that an

## Customer Services Safeguarding Strategy

“Adult at Risk” is any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation. Not all vulnerable adults will be considered an ‘adult at risk’ requiring a referral to the statutory agency.

The principles of Adults at Risk, and the responsibility of statutory agencies to take steps to protect customers from risk, is explored in various pieces of legislation across the four nations; The Care Act 2014 (England), The Social Services and Well-Being (Wales) Act 2014 and the Adult Support and Protection (Scotland) Act 2007 establish broadly similar definitions of Adults at Risk. Northern Ireland doesn’t have one piece of a standalone legislation but has published their Adult Safeguarding Policy for Northern Ireland ‘Adult Safeguarding: Prevention and Protection in Partnership’ to improve safeguarding outcomes for all adults who are at risk of harm through abuse, exploitation or neglect. In all nations there are further pieces of legislation linked to the common theme of safeguarding adults and protecting those who need support to be safe, for example legislation exploring mental capacity; Mental Capacity Act for England (for Scotland Mental Health (Scotland) Act and also Adults with Incapacity (Scotland) Act and Adult Support and Protection (Scotland) Act which refer to Mental Capacity Act).

Adults at risk may be identified by a number of indicators (see [Vulnerability indicators section](#)) but unlike children, who are vulnerable by the very nature of being children, it is not always easy to identify adults at risk. An individual can be vulnerable but not identify themselves as such for reasons such as lack of trust in authority, lack of understanding in the process or because they are experiencing exploitation. Furthermore, an individual’s vulnerability is not necessarily constant but may vary at different stages of the immigration process (for example, illness can happen at any time), and can potentially be affected by their stage in the claims process, external factors outside of Customer Services or both.

Customer Services’ adult safeguarding consideration process is designed as a simple mechanism to assist staff in considering safeguarding issues in their day-to-day duties. It extends to overseas customers and to sponsors in the UK. All members of staff will:

- be aware of their role and complete all relevant safeguarding training
- be vigilant and identify any safeguarding concerns
- make and log external and internal referrals as required
- ensure that case working decisions are made taking into account any safeguarding considerations
- keep relevant parties informed and Home Office records updated
- review and share best practice and lessons learned from things such as safeguarding inspections, multi-agency safeguarding reviews, inquests

All staff are responsible for escalating safeguarding concerns, whether dealing with a case or if they have identified a trend which is of concern. Individual business areas will have a recognised process for managing safeguarding concerns, through their

line management chains, senior caseworkers and/or their safeguarding lead officers – and where appropriate to statutory agencies when an adult may be at risk.

### Safeguarding of children

It is the duty of government and society as a whole to keep children safe. We have a responsibility to do this in Customer Services as the nature of our work, often sensitive and difficult, presents specific child-related challenges. The children we encounter through the immigration system, whether accompanied or unaccompanied, can be particularly vulnerable and so we must be vigilant to ensure we promptly identify and act where we identify safeguarding concerns.

Our statutory duty to safeguard and promote the welfare of children is detailed in Section 55 of the Borders, Citizenship and Immigration Act 2009. Every Child Matters – Change for children, is the section 55 children’s duty guidance that sets out the key principles that are applied in the Home Office.

‘Section 55 of the Borders, Citizenship and Immigration Act 2009 places a duty on the Secretary of State to make arrangements for ensuring that immigration, asylum, nationality and customs functions are discharged having regard to the need to safeguard and promote the welfare of children in the UK. This duty applies to all Home Office staff and contractors exercising these functions. It also applies to all children in the UK, not just migrant children. This may include, for example, UK-born children and British citizens to whom a visa application relates.’

All Customer Services staff have a statutory duty and responsibility to safeguard children who come into contact with Customer Services and overseas staff must apply the spirit of the duty. Children may be part of a wider family group, applying as an unaccompanied minor, in the family removals process or involved in appeals and litigation. Where there is concern that a vulnerability of someone within the household may upon the welfare of a child consideration should always be given to our duty under s55. There will often be a crossover between these issues – for example, where an adult’s vulnerable state places children within their care at risk a referral to Children’s Social Services will normally be required. In such cases you may need to involve local safeguarding teams in the case. If the child is not in immediate danger but you believe a crime may have been committed, you must also contact the police.

Further legal requirements are set out in the [Children and Social Work Act 2017](#) (and preceding legislation), Children and Young People (Scotland) Act, Social Services and Well-being (Wales) Act 2014), and The Children Order (Northern Ireland) 1995 (Order 1995). The impact of other legislation must also be considered including, but not limited to, The Children Act 1989, the Children and Families Act 2014, The United Nations convention on the Rights of the Child 1992.

Our safeguarding children consideration process is designed as a simple mechanism to assist staff in considering safeguarding issues in their day-to-day duties:

- be aware of their role and complete all relevant safeguarding training
- be vigilant and identify any safeguarding concerns

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- consult experts and make a timely decision
- make and log external and internal referrals as required
- ensure that case working decisions are made taking into account any safeguarding considerations
- keep relevant parties informed and Home Office records updated
- review and share best practice and lessons learned from things such as safeguarding inspections, multi-agency safeguarding reviews, inquests

All staff, contractors etc are responsible for escalating safeguarding children concerns, whether dealing with a particular case or if they have identified a trend which is of concern. Individual business areas will have a recognised process for managing safeguarding concerns, through their line management chains, senior caseworkers and/or their Safeguarding Lead Officers, referring to the Home Office Safeguarding Advice and Children's Champion (SACC) and statutory agencies as required.

Every member of staff in Customer Services is responsible for alerting their safeguarding lead officer of any high profile or serious safeguarding children concerns.

Delivery of this aim is supported by SACC, responsible for promoting the section 55 child safeguarding duty, as well as the wider department's safeguarding responsibilities to children and vulnerable adults. SACC provides professional advice to frontline and policy staff as well as reviewing and assuring policy and processes and helping business units to develop systems for assurance.

### Wider legal context

In considering customer needs Customer Services is bound by wider legislation, caselaw and government strategies which we use to shape our safeguarding approach. Consideration of wider issue ensures we support statutory agencies to manage risk and allows us to fully consider the need for reasonable adjustments when delivering our services. This will include, but is not limited to, consideration of:

- The Equality Act
- Violence Against Women and Girls (VAWG) strategy
- Looked after children legislation
- The Public Sector Equality Duty and associated caselaw

Additionally, Customer Services has a legal responsibility to support the work statutory agencies in their efforts to addressing exploitation and abuse, for example:

- domestic abuse issues, including Multi-Agency Risk Assessment Conferences (MARAC)
- female genital mutilation (FGM)
- child sex exploitation
- trafficking and modern slavery
- gangs and county lines
- Multi-Agency Public Protection Arrangements (MAPPA)

- Prevent

### Data sharing legislation

In determining when information can be shared with statutory agencies consideration is given to data sharing legislation. Rules on consent and information sharing are linked to 2 pieces of relevant legislation; General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA2018). The legislation makes it clear that consent is not required to share data in most circumstances when:

- other people, including other adults at risk and or children, could be at risk from the person causing harm
- it is necessary to prevent crime, or a serious crime has been committed
- we believe that the person at risk is being coerced or fearful of repercussions
- there is an overriding public interest in sharing the data
- there is reason to believe that the health and / or well-being of the data subject will be adversely affected by ongoing harm or abuse

When that threshold isn't met Customer Services staff will seek consent from the data subject, most commonly through use of a GDPR compliant Medical Consent Form. Proportionality will be considered when sharing information and health, police or social services will only receive information relevant to their role.

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# Delivering our vision

## Our work to date

In 2015 UK Visas and Immigration (UKVI) set out strategies detailing our approach to safeguarding adults and children. These strategies were produced in recognition of our responsibility to safeguard our customers who are unable to take care of themselves or protect themselves from significant harm or exploitation. In response to those strategies significant work was undertaken, and is still ongoing, with the objective to developing and embedding a culture supporting the vulnerable.

In response to the rollout of the strategies all business units across UKVI reviewed their approach to safeguarding and developed processes appropriate to the needs of their customer cohort. To support their work a safeguarding awareness training course was developed and shared widely with business units. Many units established safeguarding teams with staff working exclusively on safeguarding activities, developing a consistent professional approach to identification of issues. Customer Services established a vulnerability working group bringing together safeguarding leads from across the business to discuss and collaborate on common themes. External engagement groups with key stakeholders gave specific focus to the needs of vulnerable groups and routes of escalation for safeguarding concerns were established.

The range, scope, and progress made against objectives was recognised by the Independent Chief Inspector of Borders and Immigration (ICIBI) when he inspected the Home Office's approach to the identification and safeguarding of vulnerable adults in 2018:

“I have explored both the overall BICS approach to vulnerability and what is happening on the ground when Border Force, UK Visas and Immigration (UKVI), and Immigration Enforcement (IE) encounter vulnerable adults. Based on this and the earlier inspections, I am in no doubt that the BICS Board, senior management, and the majority of staff are serious about improving the protection provided to vulnerable individuals. A good deal of effort is already targeted at particular, well-delineated ‘cohorts’, such as children and PVoMS, and other vulnerability-focused work is ongoing across BICS to improve training, raise awareness, and capture information.”

However, the ICIBI identified that further work is required to meet objectives.

## The role of our business units

This strategy outlines Customer Services' high-level approach to safeguarding. In order to achieve our aims, we require each of our business units to work collectively and collaboratively with internal and external partners to embed safeguarding principles and processes at the heart of their operational plans.

Each business unit will have a nominated safeguarding lead officer who takes responsibility for driving forward compliance with this strategy. In some teams this

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will be an appointed officer working with authority of the head of directorate, where that person hasn't been appointed the responsibility will sit with the head of directorate. Applying intimate understanding of the needs of their customers business units will:

- support the work of statutory agencies by developing and maintaining effective working relationships with those responsible for protection and welfare
- pursue meaningful relationships with experts, including those with lived experience, to inform and develop clear processes for safeguarding customers
- assess and set out the anticipated level of intervention based on the needs of their customer cohort
- support streamlined delivery through production of standard operating procedures (SOPs) and desk aides
- assess and implement safeguarding training requirements, including ensuring compliance with wider vulnerability learning aligned to workstreams like modern slavery, female genital mutilation (FGM), forced marriage, counter terrorism and exploitation
- ensure their staff are aware of, and compliant with, the requirement to improve recording of vulnerability on Home Office computer systems
- identify communication systems for escalation of safeguarding concerns by staff and stakeholders

## Policy and guidance

Staff responsible for developing and implementing policy will maintain awareness of the impact on the vulnerable. Where appropriate policies will address the impact on vulnerable people and the steps taken to ensure that the vulnerable are able to fully assert their rights. The principles behind this are detailed in the Public Sector Equality Duty (PSED), a legal duty under the Equality Act 2010. In transferring policy to operational delivery guidance those leading must ensure safeguarding and vulnerability requirements are embedded, clearly referenced and that Equality Impact Assessments have been conducted.

## Safeguarding teams

Where safeguarding specific teams have been established, they will be the primary interface for their customer group with statutory agencies. They will partner with agencies to develop clear referral processes ensuring that high quality information is shared allowing agencies to make an informed assessment of needs. Where appropriate, they will deal with customers in a co-ordinated way with other units to ensure vulnerability needs are met; and, if they are unable to help, refer them to any other sources of help. Safeguarding teams will provide advice and support to operational commands to ensure that customer safeguarding needs are embedded in their delivery and operational plans.

## Customer Services commitment to the vulnerable

The Parliamentary and Health Service Ombudsman (PHSO) is clear that "Public bodies should treat people with sensitivity, bearing in mind their individual needs,

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and respond flexibly to the circumstances of the case. Where appropriate, they should deal with customers in a co-ordinated way with other providers to ensure their needs are met; and, if they are unable to help, refer them to any other sources of help.”

All public bodies have a responsibility and a duty of care to support the work of the statutory agencies. In Customer Services we exercise this duty of care to our customers in the way we deliver our operational objectives. Our operational systems and processes will be designed to ensure that the specific needs of a vulnerable individual are always considered and where possible accommodated.

Although many Customer Services customers and sponsors will have vulnerabilities they won't need community care services and wouldn't be suitable for a referral to the statutory agency. Customer Services is however committed to supporting all customers, and not just those that need community care. In delivering our services all Customer Services teams will be alert to vulnerabilities in order to ensure that case working activity is informed by customer needs. Customer Services staff will be vigilant for signs of vulnerability, a holistic assessment which mustn't solely rely on what we are told and what is explicit. Identification of vulnerability may be inferred from what we see, hear, feel etc. for example an observation of unusual or erratic behaviour or a change in demeanour.

Customer Services has a wide and varied customer base with different life experiences and needs so the action taken to safeguard our customers will vary from case to case. A customer seeking asylum who has just arrived in the UK will likely have no awareness of the range of public services available to them, whereas a customer seeking to extend their stay in the UK who has been resident in the UK for several years will be more likely to know already how to access health and social care services. Some customers may already be engaged with statutory services, limiting the need for any Customer Services intervention. Therefore, when delivering safeguarding services Customer Services may provide a hands-on service to some customers to facilitate their access to statutory agencies, whilst other customers may simply need signposting to organisations to progress their own needs.

To ensure that we support the work of statutory agencies all Customer Services staff will be alert to customer vulnerabilities and committed to taking appropriate action. For some staff appropriate action will be to make a referral to their safeguarding teams in order that an assessment can be made of next steps. For staff in units with no assigned safeguarding resource appropriate action will be to make the assessment of next steps, and where appropriate make an onward referral to the statutory agency. The vulnerabilities of each customer must be considered on a case-by-case basis and appropriate action taken. It would be ineffective to refer everyone with a vulnerability to the statutory agencies so Customer Services staff will engage closely with the details of each case and assess risk appropriately. Where a customer meets the criteria for such a referral, that referral should always be sent and Customer Services staff should advocate on the individual's behalf to ensure they receive the services and protection from harm they are entitled to.

If any Home Office officer identifies an individual is at risk of immediate harm, they must call 999 and request support from the appropriate emergency service.

Afterwards a referral is to be made to the relevant safeguarding team for actions to be progressed, including liaison with the relevant statutory agencies.

In meeting their objective to safeguard the vulnerable HO staff must always be alert to the 5 Rs of safeguarding:

- **recognise** – be alert to signs or symptoms of vulnerability
- **respond** – respond when a disclosure of vulnerability is made by a customer or third-party, whether this disclosure is made verbally or in writing
- **report** – act to engage the safeguarding teams in your business area if appropriate - alternatively follow the safeguarding process established by your unit
- **record** – ensure information is noted on HO computer systems, using sensitive case markings if appropriate, as other officers will be working on different aspects of the case and may need to know details of the vulnerability
- **refer** – where appropriate make referrals to the statutory agencies to ensure they can assess intervention and support needs

### Vulnerability definition

Vulnerability is defined as ‘The extent to which a person is likely to be at risk of, or come to, harm’. The extent to which someone’s vulnerability may be identified and the extent to which it may be relevant will depend on their specific encounter with the Home Office. For example, while there is a general safeguarding duty towards a child the extent of that duty and whether the child requires specific intervention will depend on several factors such as whether they are unaccompanied, who they are with, any vulnerabilities their responsible adult has. Equally, while someone being pregnant may make them more vulnerable, and that would be relevant if they were being considered for detention or asylum accommodation, it is not a question we generally ask of applicants because it is not relevant to most applications.

It will always therefore be necessary for staff to consider the guidance developed by their business unit when deciding whether there is the need to identify and record a vulnerability issue and what further action, if any, is required.

### Vulnerability indicators

There are many issues which could indicate a customer may be at risk and in need of assistance of the statutory agencies. Every contact point with customers is an opportunity to identify vulnerability and to provide support to those who need it. Customer Services has identified 26 key indicators of vulnerability. These indicators do not always mean that the individual needs a safeguarding intervention but awareness of aspects relating to the customer will assist staff in assessing whether there is a requirement to take formal action such as onward referrals to an external agency or adjustments to how Customer Services delivers services to that customer. All staff and contractors must be alert to these vulnerabilities and the need to take appropriate action to ensure safeguarding. See [Vulnerability indicators](#) for further information.

<b>Key vulnerability indicators</b>	<b>-</b>
Age / identity dispute	Physical health
Allegations of historical child abuse	Potential victim of modern slavery
Child protection / risk to the child / child neglect	Pregnancy
Disability	Proof of kinship
Domestic abuse	Suicide and self-harm Level 1
FGM (Female genital mutilation)	Suicide and self-harm Level 2
Food / fluid refusal	Suicide and self-harm Level 3
Forced marriage	Unaccompanied minor
Honour Based Abuse	Victim of assault
LGBTI (u18)	Victim of hate crime
Mental health	Victim of torture
Missing adult / child	Violent / disruptive behaviour
National Security Threat	Vulnerable to radicalisation
Homelessness	-

This list is not exhaustive. There are many factors that could individually impact on a customer and staff must be alert to this and engage safeguarding protocols where there are concerns. Issues like literacy, age, isolation, sexuality may impact on the wellbeing of customers and prompt the need for intervention activity. In considering the impact of customer vulnerabilities staff should be alert to the impact of intersectionality, for example people with a disability are 4 times more likely to live with domestic abuse. It is also important to consider that an adult with mental health issues also inhabits multiple social identities that could increase risk, including age, gender, class, race, disability, and sexuality. Furthermore, life changes can create extra risk, for example when young people transition to adults there is additional risk of exploitation. Individual consideration of risk is paramount in all cases.

## Strengthening safeguarding processes

Safeguarding is a responsibility of all staff, not just staff assigned to safeguarding casework and intervention with statutory agencies. Although there are multiple touchpoints where customers have opportunity to disclose vulnerability details many choose not to disclose because they are worried about a negative impact on their application. Therefore, first awareness of vulnerabilities can occur at any time as the case progresses through the system. Customer Services must be aware of vulnerabilities and their impact on customers throughout their entire immigration journey. In undertaking their duties all Customer Services employees and contractors will be vigilant in ensuring that vulnerable people are identified, and that appropriate action is taken promptly.

In identifying vulnerabilities Customer Services relies on staff to engage with customers, ask relevant questions, and be alert to subtle issues that may not be disclosed. Safeguarding will be strengthened if meaningful partnerships are established with external stakeholders and we create avenues for them to share vulnerability details with our business units. To support our customers Customer Services will raise awareness of staff and delivery partners about indicators of vulnerabilities the need for early identification and onward referral to through clear

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escalation structures. In addition, staff and delivery partners will collaborate and share information to ensure that those delivering services to vulnerable customers are empowered to protect customers from risk.

We will utilise our insight to safeguard the vulnerable, gained through business delivery and strategic engagement, to assess transformational activity at the design phase consistently promoting alignment with the goals of this safeguarding strategy. Through our strategic engagement channels Customer Services will also seek to raise awareness with partners of the role they can play in working with Customer Services to collectively safeguard the vulnerable.

This Safeguarding Strategy will be publicised and circulated to a Customer Services audience and linked to dedicated safeguarding pages on internal computer systems. We will support rollout with tailored communications to raise awareness of staff who have direct contact with our customers and those who work on paper-based applications. Use of consistent vulnerability indicators and consistent terminology will support a common understanding throughout Customer Services. Caseworkers will have sight of vulnerability information as case working databases will provide for consistent recording and flagging on all applications in which vulnerabilities have been identified. This data will be used to monitor service provision and meet the needs of vulnerable customers.

Each business area in Customer Services has identified an officer with lead responsibility for safeguarding. All lead officers' network with peers from across Customer Services at meetings of the Customer Services vulnerability working group, where common themes are explored, best practice shared, and colleagues collaborate on business wide matters. Group members are responsible for leading safeguarding communications to staff to promote awareness of vulnerabilities, ensuring staff are supported and follow agreed processes for safeguarding.

Training will be provided to staff on a range of vulnerability strands, on a regular and ongoing basis. Training packages will be developed with customer insight and expert advice from stakeholders. Blended training will be promoted with a mixture of classroom and eLearning options available. Business units are encouraged to review and utilise external training available from local authorities and regional safeguarding boards.

Customer Services will enhance visual awareness of vulnerabilities that affect its customers, staff, and partners. Posters and leaflets will be developed and disseminated to support awareness of vulnerabilities. These will be distributed through formal internal and external communications channels and rollout reinforced through working group members.

When making referrals to statutory agencies Customer Services staff should follow the processes established by that agency. This may differ from area to area and may mean submitting referrals via online portals or alternatively downloading and completing a standard referral template from a local authority website. In all cases referrals should be comprehensive providing full information to support the agency to make an informed assessment of needs. To support a quality referral, Safeguarding Advice and Children's Champion (SACC) will develop best practice safeguarding

## Customer Services Safeguarding Strategy

referral guidance, for both adult and child referrals, and issue these to Customer Services staff.

Appropriate planning and processes are vital to reduce risk in the system but learning lessons and constantly striving for excellence is vital. Therefore, if critical incidents occur Customer Services should focus on a partnership response involving statutory agencies, contracted partners, non-government organisations and charities which will support an appropriate and coordinated response. Afterwards a lessons learned exercise should occur to capture shared learning.

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## Safeguarding our staff

Customer Services recognises that to deliver a professional safeguarding service to our customers we must be cognisant of our duty of care to the wellbeing of our own staff. It is widely recognised that routine exposure to traumatised individuals and traumatic narratives – stories of abuse, persecution, modern slavery, and torture – may take a psychological toll on staff. This may result in:

- psychological distress
- burnout
- compassion fatigue
- vicarious trauma

Routine exposure to traumatised individuals and narratives may lead staff to employ psychological defences (consciously or unconsciously) that may involuntarily compromise their ability to effectively fulfil their role in safeguarding adults at risk. Such defences include:

- disbelief
- emotional detachment
- cynicism
- case hardening
- credibility fatigue

Safeguarding our own staff is a priority for Customer Services. To help address this issue Customer Services will explore development of a psychological supervision model for rollout to all business units. This will include consideration of work already undertaken, including a psychological factors awareness course which has been independently reviewed by external psychologists who have assured the content.

Fostering an inclusive working environment, where talking openly about the emotional impact of working with traumatised customers and traumatic narratives will be encouraged, and stigma relating to mental health will be actively challenged. Development and rollout of this model will.

- raise awareness amongst staff working with adults at risk of the psychological factors affecting their work
- raise awareness of the potentially negative psychological impact of working with traumatised individuals and narratives
- raise awareness of how the negative psychological toll may involuntarily impair our ability to effectively fulfil our safeguarding duties to adults at risk
- raise awareness amongst all staff and managers of the range of internal and external support mechanisms available to staff
- support staff in being reflective and self-aware

To support these aims the People Leads will work with HR partners to.

## Customer Services Safeguarding Strategy

- provide adequate and accessible support mechanisms to all staff that are routinely exposed to traumatized individuals and narratives
- consider the benefits of 'reflection groups' to address the effects of routine and cumulative exposure to traumatized individuals and traumatic narratives through peer discussion and support
- consider the benefits of systems for debriefing and peer-support sessions to staff following exposure to particularly distressed individuals or distressing evidence
- develop an engaged network of Mental Health First Aid (MHFA) trained staff that are deployed throughout Customer Services and available to support colleagues

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## Commercial partner compliance

Commercial partners are engaged to deliver services on behalf of Customer Services across the entirety of our business, both abroad and in the UK. As they are delivering services in place of Customer Services staff commercial service partners are responsible for meeting the same safeguarding standards as Customer Services staff. Partners should assess and manage vulnerability needs and safeguarding risks when providing services, and all commercial contracts must set this out very clearly. Partners are required by law to notify Customer Services of serious incidents that occur to our customers when in their care.

Customer Services business units that work with commercial partners must put in place clear and effective systems that monitor commercial partners' activities when dealing with adults at risk while carrying out their functions. All contracts and / or grant agreements given to partners to provide services require them to have regard to the need to safeguard adults at risk. To support these aims.

- Customer Services will ensure that commercial contracts ensure partners are clear about their responsibilities to safeguard our customers, and that they give their staff safeguarding specific training
- Customer Services will ensure compliance with vetting procedures on staff and partners working with our customers
- commercial partners shall have regard to the need to safeguard and promote the welfare of children when providing their services
- commercial partners will maintain records to show how they have prioritised cases addressing customer vulnerabilities and how they have considered the welfare of vulnerable adults
- Customer Services staff responsible for managing contracts with commercial partners will implement governance systems to assure contractors demonstrate their compliance with safeguarding requirements, including robust inspection procedures for those who are particularly vulnerable
- Customer Services will ensure implementation of a robust process to ensure customers feel confident to report any concerns they are having about their safety
- commercial partners delivery of services to adults at risk will regularly be explored as part of corporate governance activity

There is a clear need for effective multi-agency working and information sharing to secure improved safeguarding outcomes. As a minimum Customer Services requires that the service provider's training programme for staff in regular contact with Service Users and responsible for the safety and security of Service Users and dependent children to cover:

- vulnerability awareness
- diversity and inclusion
- discrimination awareness
- suicide and self-harm awareness
- Health and Safety of customers

## Customer Services Safeguarding Strategy

- psychological factors arising from exposure to traumatic narratives

Customer Services contract managers are responsible for compliance across all aspects of agreements. Where safeguarding processes are not effective, it is essential that action is taken to mitigate any future failings, including suspending contracts if required. To support this clear communication systems for escalation of safeguarding concerns by stakeholders should be established by those managing commercial contracts.

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## Governance and accountability

This strategy showcases Customer Services' commitment to support the vulnerable in the immigration system and to put safeguarding and welfare at the heart of our work. We will put appropriate safeguarding systems and lines of accountability in place to ensure that we are compliant with our policy. We will strive to ensure that safeguarding is embedded into business-as-usual activity and in line with the Customer Services core principles.

The deliverables outlined in this strategy and detailed in our action plans are to be prioritised and phased for delivery over the next 2 years, with clear owners in each business area. We will assess progress using through the Customer Services vulnerability working group.

The strategy will be monitored and reviewed to adapt to evolving services and customer needs.

- safeguarding risks will be monitored through data collection
- feedback from staff will be obtained in team meetings
- we will measure training uptake
- stakeholders will be consulted for feedback and customer insight
- a review of complaints will outline areas for service development

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## Action plan

This strategy outlines Customer Services’ high-level approach to safeguarding. Through the Customer Services vulnerability working group we will support continued improvement in safeguarding to deliver tangible improvements in safeguarding across Customer Services. The table below sets out the key actions that will support delivery of this strategy.

-	<b>Customer Services Safeguarding Strategy – Key actions</b>
<b>1. Leadership</b>	<p>There is an appointed senior civil servant (SCS) Lead for safeguarding to ensure a clear focus on safeguarding is maintained.</p> <p>Ensure the Customer Services Board and senior leadership team (SLT) proactively engage with staff at all levels to ensure awareness of safeguarding to their work.</p> <p>Develop the Customer Services vulnerability working group to work consistently and in collaboration with one another across the Directorate.</p> <p>Embed safeguarding vision and values in the command, developing a workforce that is aware, involved and encouraged to escalate risk and continuously improve safeguarding practices.</p>
<b>2. Safeguarding adults</b>	<p>There is effective guidance and training for staff in relation to adults at risk and that this is regularly monitored and reviewed and updated accordingly.</p> <p>Embed front line assurance and central verification assessments; there is routine monitoring to ensure that staff are taking steps to identify adults at risk when encountered.</p> <p>Learn lessons from the Windrush review, including ethical decision making, to ensure comprehensive consideration of customer needs.</p> <p>Define responsibilities, so that staff understand lines of accountability and responsibility and who to contact if they have a safeguarding concern.</p>

-	<b>Customer Services Safeguarding Strategy – Key actions</b>
<b>3. Safeguarding children</b>	<p>Develop staff awareness of our policies and procedures on safeguarding and promoting the welfare of children.</p> <p>Learn lessons from the Windrush review, including ethical decision making, to ensure comprehensive consideration of customer needs.</p> <p>Develop systems to enable staff and others to make a complaint (whistle blowing arrangements) where there are child protection concerns.</p> <p>Develop systems to enable a child and/or their representative to raise concerns that the section 55 duty is not being taken properly into account.</p>
<b>4. Commercial partner compliance</b>	<p>Ensure commercial contracts are clear about contractor responsibilities to safeguard our customers.</p> <p>Commercial partners will give their staff safeguarding specific training.</p> <p>Commercial partners will maintain records to show how they have prioritised cases addressing customer vulnerabilities and how they have considered the welfare of vulnerable adults.</p> <p>Commercial providers shall have regard to the need to safeguard and promote the welfare of children, in the UK and overseas, when providing their services.</p> <p>Customer Services staff responsible for managing contracts with commercial providers will implement governance systems to assure our contractors demonstrate their compliance with safeguarding requirements, including robust inspection procedures for those who are particularly vulnerable.</p> <p>Customer Services will ensure implementation of a robust process to ensure customers feel confident to report any concerns they are having about their safety.</p> <p>Commercial providers performance regarding adults at risk will regularly be reported to the respective senior management team (SMT) and any significant issues will be raised to SCS safeguarding leads.</p>

-	<b>Customer Services Safeguarding Strategy – Key actions</b>
<b>5. Working with customers</b>	<p>Ensure staff can easily access safeguarding guidance.                      Develop and ensure consistent implementation of safeguarding policies and procedures across Customer Services.                      Embed safeguarding risks in the Customer Services risk management process.                      Develop communications to help vulnerable customers understand how our services support their vulnerability needs.                      Regularly review and seek to improve the services that we provide to those at risk.</p>
<b>6. Training and professional development</b>	<p>Ensure all staff, including contractors and commercial partners are aware of and complete the training required to effectively comply with safeguarding responsibilities, including training required to effectively comply with section 55.                      Maintain effective records of staff completing safeguarding training.                      Raise awareness of safeguarding requirements with new staff through induction programs.                      Ensure all staff, including contractors and commercial partners are aware of and complete the training required to comply effectively with the Modern Slavery referral process.                      Local training opportunities and ‘on the job’ support is available for all staff.                      Parameters for training are assessed and clear instruction on refreshing learning are clearly detailed and understood.</p>
<b>7. Integrity</b>	<p>Ensure managers and contractors understand their responsibility to complete vetting procedures on staff working with vulnerable groups.                      Ensure all those carrying out unsupervised regulated activity with children are Disclosure and Barring Service (DBS) checked.                      Ensure our systems and processes have the right safeguarding checks.                      Escalations structures and processes are publicised to all.</p>
<b>8. Inter-agency working</b>	<p>Develop and maintain effective working relationships with key statutory agencies responsible for adult at risk protection and welfare.                      Review systems to record concerns raised by statutory agencies or others where an immigration record does not exist.</p>

-	<b>Customer Services Safeguarding Strategy – Key actions</b>
<b>9. Information sharing</b>	<p>Ensure staff understand information sharing protocols and that children’s information is shared securely, appropriately, and legally.</p> <p>Embed effective communication of case reviews, audits, and inspections, evaluate lessons learned and introduce improvements across Customer Services.</p> <p>Ensure effective working arrangements are in place to share best practice with the Safeguarding Advice and Children’s Champion (SACC). and other Migration and Borders Group commands.</p> <p>Develop working relationships with internal and external partners to improve engagement and sharing of information practices.</p> <p>Review staff understanding of responsibility to ensure that local arrangements are considered for the devolved administrations of Northern Ireland, Scotland, and Wales.</p>

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## Vulnerability indicators

This list is not exhaustive but has been included to provide some insight.

### Age / identity dispute

Age disputes most frequently arise when an asylum seeker first applies for asylum, for example at a port of entry. If an asylum-seeker's claim to be a child is doubted by Home Office, and 'there is little or no documentary evidence to prove their age', the Home Office will conduct an initial 'assessment' of the individual and may seek a formal assessment of age from Social Services.

### Allegations of historical child abuse

One of the recommendations from the Peter Wanless and Richard Whittam QC review of the Home Office's handling of child abuse allegations is for a list to be kept centrally of where the department refers an allegation of child abuse to the police. This list is maintained by the Tackling Exploitation and Abuse Unit. As a result, where you refer an allegation of child abuse to the police, you must notify the Tackling Exploitation and Abuse Unit afterwards via the Child Abuse Referrals inbox.

### Child protection / risk to the child / child neglect

Home Office staff should follow guidance issued by the Safeguarding Advice and Children's Champion (SACC) team when making referrals to local authorities.

In England, neglect is defined in the Department for Education's [working together to safeguard children 2018](#) as the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of their health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In England, the Department for Education's guidance on [what to do if you're worried a child is being abused](#) sets out the following signs as possible indicators of neglect:

- children who are living in a home that is indisputably dirty or unsafe
- children who are left hungry or dirty

## Customer Services Safeguarding Strategy

- children who are left without adequate clothing, such as not having a winter coat
- children who are living in dangerous conditions - around drugs, alcohol, or violence
- children who are often angry, aggressive, or self-harm
- children who fail to receive basic health care
- parents who fail to seek medical treatment when their children are ill or are injured

Neglect may also occur where the child's parent or carer has mental health problems which mean they are unwell or not coping. You may, for example, be concerned where a parent or carer explicitly states, in their child's presence, that they will harm or kill themselves should they receive a negative BICS decision or be returned to their country of origin.

### Disability

As defined by the [Equality Act 2010](#) (which applies in England, Scotland and Wales), a person is disabled if they have a physical or mental impairment that has a 'substantial' (which means more than minor or trivial) and 'long-term' (which means 12 months or more) negative effect on their ability to do normal daily activities.

While the Equality Act 2010 does not apply in Northern Ireland, the [Disability Discrimination Act 1995](#) (which does apply there) similarly defines disability as a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.

### Domestic abuse

A criminal offence in the UK, domestic abuse is defined across government as 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 gender or sexuality.

It covers a range of types of abuse, including, but not limited to, psychological, physical, sexual, financial, or emotional abuse. Children who live in these situations are at risk of abuse and emotional harm.

You must carefully consider how you engage with a child you have identified, or suspect, has been, or is at risk of domestic abuse. You must take all reports of domestic abuse and related information seriously, regardless of whether this has come directly from the victim, their friends and family, or other agencies. It is essential that you are mindful of any trauma the child may have experienced already.

### FGM (female genital mutilation)

Female genital mutilation (FGM), sometimes known as 'female genital cutting' 'circumcision' or 'initiation', is a procedure where the female genital organs are injured or changed and there is no medical reason for this.

The age at which FGM is carried out varies enormously. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage, or during a woman's first pregnancy.

FGM is illegal in the UK. It is also illegal to take a British national or permanent resident overseas for FGM, or to help someone trying to do this.

FGM is an unacceptable practice for which there is no justification. A form of child abuse, it is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and long-term health consequences, including mental health problems, difficulties in childbirth, or death.

### Food / fluid refusal

Food and/or fluid refusal occurs for a variety of reasons. It may be used as a political tool, as a method of exercising control over others, at either the individual, family, or societal level, or as a method of self-harm, and occasionally it indicates possible mental illness. In all circumstances the statutory agencies should be engaged when staff receive a report that a customer is self-harming in this manner.

### Forced marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so. It is recognised in the UK as a form of child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will may be:

- physical - such as threats, physical violence, or sexual violence
- emotional and psychological - such as making someone feel like they are bringing 'shame' on their family

Financial abuse, such as taking someone's wages, may also be a factor.

[The Anti-social Behaviour, Crime and Policing Act 2014](#) made it a criminal offence in England, Wales, and Scotland to force someone to marry. (It is a criminal offence in Northern Ireland under separate legislation). This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not)

You must not confuse a forced marriage with an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in choosing a spouse.

## Homelessness, including rough sleeping

Homelessness covers any situation where an individual does not have a permanent or safe place to live.

This may be because:

- they have nowhere to stay, they are rough sleeping or squatting
- they have a temporary arrangement; they are sofa surfing or staying in a B&B
- the accommodation is unsafe, because of the threat of domestic violence, issues at the accommodation which affect the individual's health, or because it lacks security

This list is not exhaustive.

Everyone who is homeless is vulnerable, even if they have no other vulnerabilities, because they are more at risk of being exploited or coming to harm, especially those who are rough sleeping. Not all, but some people who are homeless will also have other vulnerabilities such as physical or mental health conditions, substance misuse or illiteracy, for example. These additional vulnerabilities can make their homelessness even more entrenched making it difficult for them to find a route off the streets.

Staff are encouraged to acknowledge homelessness as a vulnerability and take a person-centred approach with customers experiencing homelessness.

Staff should consider completing appropriate safeguarding action for a customer experiencing homelessness. This could include, with the customer's consent, making a referral to the Local Authority Housing team

Providing appropriate signposting to where customers can access support and information is also encouraged.

For further information or support staff can contact the Home Office Homelessness Team (HOHT).

The Homelessness Escalations Service (HES) works with decision-making units to get faster decisions for non-UK nationals who are homeless.

For further information email HES.

## Honour based abuse

The [Crown Prosecution Service](#) (for England and Wales) defines 'honour' based abuse as an incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an

individual, family, or community for alleged or perceived breaches of the family or community's code of behaviour.

Predominantly committed against women, 'honour' based abuse is a violation of human rights and may be a form of domestic or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

### LGBTI (under 18)

Sexual orientation and gender identity can be a risk factor for any person and all Home Office staff should be alert to the impacts on all customers. There is however a heightened risk to LGBTI youths. Young people may encounter discrimination, bullying, hate crime, isolation, health issues, family problems without having developed the life skills to cope. Current evidence shows that LGBTI young people have a greater risk of suicidal behaviour than their heterosexual peers. The discrimination and stigma from others that many individuals experience in their everyday lives, whether at home, work or school is one of the main reasons behind this. This stigma and discrimination, and the fear of it happening, can prevent individuals from reaching out for help when they need it. It can also prevent those in a position to help from asking questions about an individual's sexual orientation and identity. This can result in further stress that contributes to higher levels of mental illness, isolation, depression, feelings of victimisation and stressful interpersonal relationships with family, peers, and community.

### Mental health

Mental health problems can affect anyone and have a significant effect on the lives of individuals, their families, communities, and wider society. Together with substance misuse, mental illness accounts for 21.3% of the total morbidity burden in England. One in six adults have had a common mental health disorder, such as anxiety, in the last week, according to survey data. The unique life experiences of many Home Office customers can be harrowing, and many have witnessed to violence, torture, and the death of those closest to them. These experiences can lead to debilitating mental health conditions such as anxiety disorders, PTSD, and depression. Home Office staff have an important role on helping those with mental health problems to understand the support available to them from statutory agencies.

### Missing adult / child

Customers that are deemed as vulnerable may fail to stay engaged with the Home Office for a number of reasons that could be directly linked to their vulnerability. It should not automatically be assumed that a vulnerable customer has absconded, although that ultimately may be the outcome. Further checks need to be made to when a vulnerable customer may be missing. Any child who is missing will be at increased risk of abuse or harm because they are out of contact with support agencies such as their school, healthcare professionals, and the Home Office.

## National security threat

Protecting the public is at the forefront of the work we do at the Home Office. We are committed to protecting our country and its people from the things that threaten our safety, as we continue to respond to the serious and evolving threat posed by terrorism in a manner that preserves our way of life.

The work of the Office for Security and Counterterrorism (OSCT) is fundamental to the security of this country. Defeating terrorism is at the heart of our work. This work is built around the 4 Ps of CONTEST, the counter-terrorism (CT) strategy: Prevent, Pursue, Protect, Prepare.

## Physical health

Not all customers with a physical health issue will meet the criteria for disability (see above) however those with a physical health issue may need additional support from the Home Office, both in direct delivery of our services and to access health services in the UK.

## Potential victim of modern slavery

Modern slavery is a serious and brutal crime in which people, in violation of their freedom and integrity, are treated as commodities and exploited for gain or other benefit.

Modern slavery includes human trafficking, slavery, servitude and forced and compulsory labour. Exploitation takes various forms, including sexual exploitation, forced manual labour, and domestic servitude.

Modern slavery is an international problem, so victims come from all walks of life. The victims you encounter may have entered the UK legally, on forged documentation or clandestinely. Victims can also be British citizens living in the UK.

Modern slavery must not be confused with human smuggling, which occurs when a person seeks the help of a facilitator to enter the UK illegally, and the relationship ends once the transaction ends.

Victims of modern slavery may be unwilling to come forward to law enforcement or public protection agencies, not seeing themselves as victims, or fearing further reprisals from their abusers. Victims may also not always be immediately recognised as such by those who encounter them.

## Pregnancy

Customers who are pregnant may need additional support from the Home Office, both in direct delivery of our services and to access health services in the UK.

## Proof of kinship

Where an asylum-seeking child is under the care of someone that is not their birth parent the issue of kinship/private fostering should formally be explored in order to assure that the child is not being trafficked or exploited.

Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 such as a grandparent, brother, sister, uncle, or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer.

A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break. Exemptions to this definition are set out in Schedule 8 to the Children Act 1989.

Private fostering arrangements can be a positive response from within the community to difficulties experienced by families. Nonetheless, privately fostered children remain a diverse and potentially vulnerable group.

In line with local authority duties under paragraph (7A) of Schedule 8 to the Children Act 1989 (inserted by section 44 of the Children Act 2004), education, health and other professionals (such as frontline BICS staff) should, as a matter of good practice, notify the local authority of a private fostering arrangement that comes to their attention, where they are not satisfied that the local authority has been, or will be, notified of the arrangement. This enables the local authority to then discharge its duty to satisfy itself that the welfare of the privately fostered child concerned is satisfactorily safeguarded and promoted.

## Suicide and self-harm

The Home Office has issued internal guidance relating to suicide and self-harm. This guidance tells staff what action to take if they encounter a customer they believe is at risk of suicide or harming themselves or might be a risk to others.

### Suicide and self-harm level 1

Suicide and self-harm level 1 cases involve one incident of threatened self-harm or suicide. This may be in written correspondence or verbally on the telephone or in person.

### Suicide and self-harm level 2

Suicide and self-harm level 2 cases involve evidence of either:

- repeated threats of self-harm or suicide (the CID database will record any previous incident)

- a minor incident of actual self-harm that has already occurred (this is an incident which is unlikely, in itself, to require medical treatment)

### Suicide and self-harm level 3

Suicide and self-harm level 3 cases are those where:

- there is a serious, immediate, and evidence-based risk the person is likely to commit suicide or harm themselves
- serious self-harm or attempted suicide has already occurred (serious self-harm is action with is likely, in itself, to require medical treatment)

### Unaccompanied minor

This means there is no adult with responsibility for the child who is present or immediately contactable, the child is lost or abandoned, or the person who has been caring for the child is prevented from providing them with suitable accommodation or care. Given their vulnerable circumstances, these children may require welfare, care and protection needs to be addressed.

### Victim of assault

An assault is the act of inflicting physical harm or unwanted physical contact upon a person or a threat or attempt to commit such an action. It is a crime and subject to criminal prosecution. In all circumstances the relevant statutory agencies should be engaged. If the Home Office is providing accommodation to the customer consideration should be given to relocation, this should be informed by discussion with the victim.

### Victim of hate crime

The term 'hate crime' can be used to describe a range of criminal behaviour where the perpetrator is motivated by hostility or demonstrates hostility towards the victim's disability, race, religion, sexual orientation, or transgender identity.

These aspects of a person's identity are known as 'protected characteristics'. A hate crime can include verbal abuse, intimidation, threats, harassment, assault, and bullying, as well as damage to property. The perpetrator can also be a friend, carer or acquaintance who exploits their relationship with the victim for financial gain or some other criminal purpose.

In all circumstances the relevant statutory agencies should be engaged. If the Home Office is providing accommodation to the customer consideration should be given to relocation, this should be informed by discussion with the victim.

## Victim of torture

The traumatic nature of torture means that particular care and sensitivity is required when engaging with customers who claim to be victims of torture. Staff should ensure that they are familiar with best practice guidance.

Not all forms of torture result in physical scars or injuries that are identifiable during a medical examination or are visible to an interviewing officer.

A torture victim's potential shame, distress, embarrassment, and humiliation about recounting their experiences are difficulties which may need to be overcome. They may find it particularly difficult in the atmosphere of officialdom. Those who have suffered at the hands of their own authorities may distrust officials here, despite travelling to this country to seek refuge.

## Violent / disruptive behaviour

Customers acting in an aggressive or disruptive manner towards staff or other service users are likely to cause harassment, alarm, or distress to others. In all cases records of incidents should be kept noting the day, date, time, and nature of the behaviour causing annoyance or distress. Where appropriate the statutory agencies should be engaged.

## Vulnerable to radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Established in 2011, the [Prevent strategy](#) is part of the government's overall counter-terrorism strategy (known as [CONTEST](#)). It aims to safeguard and support those vulnerable to radicalisation to stop them becoming terrorists or supporting terrorism.

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