

Application Guidance: Application for Approval as a Community Sponsor

Version: December 2023

This guidance accompanies the 'Application for Approval as a Community Sponsor' form. Please refer to this guidance as you complete your application and provide as much information as possible against each requirement. The numbering in this document corresponds to the numbering in the application form. Your application should be detailed, comprehensive, supported with evidence and action-oriented. Carrying out the research required for this application will assist you in planning what your group can offer to a resettled family.

Reset is an organisation funded by the Home Office to provide training and support to prospective and approved community sponsor groups. There are additional resources and guidance available on Reset's website: http://www.training-resetuk.org/.

When applying for full approval, your completed application must include:

- a signed and dated application form
- permission to apply from the appropriate local authority/authorities
- details of the accommodation (when applying for full approval)
- confirmation that you have invited the local authority to inspect the property
- confirmation that £9000 has been ring-fenced for this project
- confirmation you will provide the family with a copy of your complaints policy in line with our template and guidance
- a safeguarding policy which has been shared with your local authority
- confirmation that your group will attend training provided by Reset
- confirmation that your group is either a registered charity or a community interest company.

If you are applying for approval in principle with conditions, your submission must include:

- a signed and dated application form
- permission to apply from the appropriate local authority/authorities
- a safeguarding policy

Please note, if you have not applied for Community Sponsorship before, it is possible to submit two applications at the same time; one for full approval and the other for approval in principle. The second application would be considered for full approval after a satisfactory post arrival support visit for the first resettled family. If your application is being made through a charity who have participated in Community Sponsorship previously, this does not apply.

All completed applications must be submitted to: communitysponsorship@homeoffice.gov.uk.

We recommend that you retain a copy of your completed application.

The Home Office will use the personal information you provide to consider this application. We may also share your information with other public and private sector organisations in the UK and overseas. For more detail please see the Privacy Notice for the Border, Immigration and Citizenship system at: Borders, immigration and citizenship: privacy information notice. This also sets out your rights under the Data Protection Act 2018 and explains how you can access your personal information and complain if you have concerns about how we are using it.

The information you provide on this form will be stored on a computer which is registered under the General Data Protection Regulation.

Section 1. About Your Organisation

Your organisation must have status as either:

- a charity, registered with the Charities Commission in England and Wales, the Office of the Scottish Charity Regulator (OSCR) in Scotland, or the Charities Commission for Northern Ireland
- an individual or body falling within section 10(2)(a) of the Charities Act 2011
- or a Community Interest Company (CIC), registered with Companies House.

Community groups interested in setting up a charity in England and Wales can find more information at <u>GOV.UK</u>. Groups in Scotland can access more information at the <u>Scottish Charity Regulator website</u>, and groups in Northern Ireland should refer to the <u>Charities Commission for Northern Ireland</u> website. Community groups can decide to partner with an existing charity instead of becoming a charity themselves. The partner must be prepared to take full responsibility for the sponsorship arrangement and ensure that there are clear lines of accountability with your organisation.

CICs are limited companies which operate to provide a benefit to the community they serve. The purpose of CIC is primarily one of community benefit rather than private profit. For guidance on how to form a CIC, please refer to GOV.UK.

Section 2. About Your Personnel

Every sponsor group must have a lead sponsor. The lead sponsor is ultimately accountable for the resettlement support provided by the group to the resettled family. They should hold a permanent and senior position within the organisation. Typically, they will be a member of the board of the charity or community interest company, or hold the position of Chief Executive, director, trustee or equivalent. The lead sponsor's responsibilities include adhering to the legal and financial requirements; establishing that a robust safeguarding policy is in place and adhered to; ensuring group members are suitable to support a resettled family and that consideration is given to conducting Disclosure and Barring Service checks where applicable.

2.7 Please use the following link to get a share code to prove your status https://www.gov.uk/view-prove-immigration-status.

2.10 The address provided should be the group's agreed contact address.

Core support personnel

2.14 Community sponsor groups vary in size but are often made up of 5 to 20 members, some of whom might take on specialist roles. Some groups have found it helpful to have key roles for different elements of activity. Aside from the lead sponsor, project manager and safeguarding lead, other roles can be determined at the discretion of the group, but it may be helpful to have leads for housing, education, health, welfare income, accessing employment and volunteering, ESOL and interpreters.

Section 3. Community Sponsorship Resettlement Plan

In completing this section of the application form, you should refer closely to the Statement of Requirements for Sponsors (see Annex D).

Social Welfare Income

- **3.1a.** To estimate the likely social welfare income the resettled family will receive, please visit <u>Benefits calculators</u>. If you have not yet identified accommodation, it is recommended that you base your calculations on a two adult + three child family, but do consider that the size of the resettled family may vary. You may also wish to consider the impact of different property sizes.
- **3.1b.** You will need to be able to assist the resettled family in opening a bank account for them to receive their social welfare income. You will not be able to open the bank account without them, but it is advisable for your group to research what you need to do with your local banks so that you can assist the resettled family in making a decision on where their account/s will be opened. In supporting the resettled family to set up a bank account, give some thought to what banks may require and how the resettled family will be able to meet these requirements. You may wish to meet with your local banks prior to arrival to understand the options. Encourage all adult family members to have their own bank account and ensure they are aware of how to access their account.
- **3.1c** Connect with the local DWP Refugee Group Lead in advance to tell them about the resettlement scheme and the roles that the Home Office and local authority play. Developing a relationship with Job Centre staff will be important going forward. (See Annex E for the DWP refugee Group Lead's contact details).

Some Job Centre Plus sites allow for appointments to be pre-booked in advance of a family's arrival. Research whether this is possible at your local Job Centre Plus, if not, ensure an appointment is booked at the earliest opportunity.

School Registration

3.2a Become familiar with the school registration process in your local area, so that you know in advance what information will be required to register children at schools. This will enable you to start the registration process when you receive the arrival date for the resettled family. It is anticipated that the registration process should be concluded no later than two weeks after the resettled family's arrival. It's also important that you find out what school places are available as this will be helpful information in matching a suitable family to your group, however this detail is not required in your resettlement

plan. Early engagement with your local authority should help with this process.

English for Speakers of Other Languages (ESOL)

Resettled families will need to learn English (if the family are being resettled to Wales, consideration should be made to whether the family also need to learn Welsh) to improve their integration into your community and access medical care, local amenities, education and employment independently. Providing English for Speakers of Other Languages (ESOL) training is a key requirement for resettled families.

Learning English can be delivered through formal or informal teaching and training.

Formal language training is the provision of ESOL, or employment sector specific courses, which should allow refugees to attain accredited qualifications from a provider regulated by an appropriate national body (i.e. OFQAL, SQA or Qualifications Wales). This also includes courses which do not lead to an accredited qualification but instead enable refugees to study at pre-entry level, for which there are no qualifications, so they can later access a course which does lead to an accredited qualification. Other key characteristics of formal language training are that:

- delivery is led by qualified tutors, normally provided at the local level by a college or formal provider:
- a diagnostic assessment led by a qualified ESOL tutor was used to place learners at an appropriate level; and
- · it follows an agreed curricula.

The availability of providers will depend on local supply. Most providers are well-versed in providing a range of provision to suit learners' needs. The <u>provider search</u> on the <u>National Careers Service</u> website is a useful resource.

Informal language training may not have all or any of the above characteristics. It can be delivered by a range of people, including volunteers, and can include confidence building, active citizenship and whole host of leisure or community activities.

3.2b You are required to source a minimum of 8 hours of ESOL teaching per week for each adult in the resettled family for the first 12 months of their stay. Any further support you might be able to offer after this period is encouraged, though not compulsory. ESOL tuition should start within a month of the resettled family arriving in the UK. ESOL courses can be provided at local colleges and community organisations. Depending on local availability, you may need to arrange to pay for classes privately. You should consider the timing of these classes, being careful to avoid scheduling conflicts such as school collection.

If you need further advice on sourcing ESOL lessons or assessments, contact your regional ESOL coordinator (see <u>Annex F</u> for a list of ESOL coordinator contacts).

In instances where adults arrive outside term time, making immediate access to formal language training difficult, alternative informal language training should be provided within one month of arrival until formal arrangements for training can be arranged.

You should think about appropriate childcare from local providers or volunteers to allow adults to undertake formal and informal English training. You should also consider additional costs such as travel to reach the classes and cover childcare.

Your group are entitled to claim £850 ESOL funding for each adult refugee arriving through community sponsorship, and the resettled family should be able to benefit from any money claimed. This funding should be used to ensure that refugees are able to access ESOL services / to procure tuition direct with a service provider.

3.2c Please demonstrate that you have considered the availability of literacy and numeracy tuition should members of the resettled family need support with this. For a number of refugees, formal language learning can be difficult as they are not fully literate in their native tongue.

GP Registration

3.2e Please demonstrate that you have considered access to other health services such as dentists and opticians. Should a resettled family require access to local mental health and wellbeing services, you should support the family to seek advice from a GP. You do not always need to be a professional to notice the signs of a mental health problem, however you should always leave formal diagnoses to professionals. It is also suggested that you research and establish links with organisations in your area who can provide mental health and wellbeing services to refugees.

Access to Employment

- **3.2f** Please consider that some resettled refugees will have qualifications and a history of professional/skilled work, whilst others may not have received much formal education in their home country. Supporting resettled family members into employment will need to be tailored to individual circumstances and might involve researching specific employment opportunities, vocational ESOL, arranging work shadowing placements, assisting with writing CVs, or preparing for interviews. You may also want to consider identifying local employers who would be open to providing work experience, etc.
- **3.2g** Please explore a wide range of volunteering opportunities and establish links with trusted organisations that may be able to offer work experience to the resettled adults. For many resettled refugees, volunteering is the first step on their journey to employment, as well as supporting ESOL progression and providing social and community support. It is important that any volunteering, work experience placements, or part-time work fit in with the requirements of the Job Centre.

Interpretation Services

3.2h It is essential that a 24-hour interpreting service is available to the resettled family for the first week after arrival. You could consider telephone services for this intensive period, particularly for evenings and overnight. Your group might find that having a mobile phone which interpreters share is the best way of meeting this requirement, as that way the resettled family only have one number they need to call.

Groups are required to provide access to interpreting services for the first 12 months following the arrival of the resettled family. It is likely that the first four to six weeks after arrival will be the time when the most intensive interpreting services are required, however, this period may be longer depending on the needs of the resettled family. You should consider confidentiality and whether gender-specific interpreters are required. There may be some situations when it is appropriate to use a professional interpreter

and groups should ensure that they have sufficient resources to pay for this, as and when it is necessary, over the course of the year. (Please note that when required, statutory service providers should provide interpretation services.)

3.3. Accommodation

- **3.3a** It is not necessary to have sourced accommodation for your application to be considered, however you will need to secure suitable accommodation for a two-year period prior to your application receiving final approval.
- **3.3e** Accommodation must be available to the resettled family for two years.
- **3.3h** All resettled families will be entitled to Local Housing Allowance (LHA). To find out an estimate for the amount the resettled family will be entitled to, please visit https://lha-direct.voa.gov.uk/search.aspx. The rent should ideally be set at or below the Local Housing Allowance rate to enable the family to afford it with the social welfare income they receive. Where the LHA rate does not meet the full rental cost, you will need to show that you have considered the available funds and potential expenditure and have budgeted accordingly.
- **3.3i** You must give the local authority the opportunity to inspect your accommodation.
- **3.3j** If the local authority is unable, or declines to inspect the property, you must provide evidence to demonstrate that the property meets the standards set out in the Statement of Requirements, detailed at Annex D. This should be an independent inspection by a suitably qualified professional.
- **3.3k** You are required to establish a relationship with the local police. Upon receipt of the address of the property and local police contact details from yourself, the Home Office will arrange for the Police Consultation Form to be completed. See Annex A.

Section 4. Statement of Requirements

When considering how you will deliver the outcomes of the statement of requirements, please also read some further guidance to that contained and asked about in Section 3 of the application form:

Welcome to the UK - Arrival

Arrival in the UK will be a momentous time for your group as well as the resettled family. Keep in mind that those arriving may be overwhelmed and not all members of your group will be able to attend. A maximum of five people including interpreters should be sufficient.

Ensure the welcome is "low-key" and do not advertise the arrival date outside of your core group. You must seek permission from the family to take and publish any photographs.

When making transport arrangements, please consider the size of transport required to accommodate the size of the resettled family and their luggage. It is particularly important to reassure the resettled family that their belongings are secure, and it is advisable to make arrangements that ensure that the resettled family are not separated from their luggage on the journey from the airport to their new home.

The Home Office arranges transport for families sponsored from bridging accommodation.

Please consider what practical preparations are needed to make the resettled family feel welcome in their new home. Having access to a welcome pack of groceries with culturally appropriate food, emergency contact information, etc.

Expenses

Your group is required to provide a minimum of £200 cash per resettled family member after they arrive in the UK, to cover initial expenditure. The resettled family are not required to pay this money back, and you will not be able to claim this from the Home Office.

When providing this initial cash payment to the resettled family, you will want to discuss with them how they will want to receive the payment, bearing in mind the weekly social welfare income the resettled family are likely to receive. You should also consider the denominations that you will provide, how payments could be staggered, most likely in line with any social welfare income payments, and how you will advise the resettled family to keep their money safe.

To help the family become familiar with UK currency and budgeting, you could consider developing pictorial guidance, illustrating everyday items with comparisons of the cost of household provisions, the cost in sterling and also including a currency conversion chart from the resettled family's host country. Consider letting the family know about different shops in the local area, including discount supermarkets and whether there are any opportunities to join in bulk buy ordering for some items.

You should empower the resettled family to familiarise themselves and understand how to access local transport links etc. You should assist the family on the initial shopping trips and how to navigate shopping customs such as self-checkout tills and plastic bag charges. Advise them on affordable shops in the area.

You will be making a commitment to provide support to a refugee family for 24 months, however the integration support activities relating to 'Establishing a Life in the UK' are to be delivered in the first 12 months of the family's arrival in the UK.

The Biometric Residence Permit (BRP) is an immigration document, issued in the form of a card, similar in appearance to a driving licence, which proves a refugee's right to stay, work and study in the UK. You should consider who in your group is best placed to receive these at a secure address on behalf of the resettled family and how they will get them to the resettled family. The BRP will not be issued until after the resettled family has arrived. The BRP must be hand delivered to the resettled family within one day of them being received by your group.

Digital

Access to digital services can be an important tool in developing a range of skills and provides many resettled families with the means of maintaining communication with family and friends in their home country. Facilitating access to digital services could include researching public places with free access to the internet, e.g. libraries, community venues. Some resettled family members might require support to be able to use the internet and this could be provided by the group themselves or through courses available in the community.

Accommodation

Consider whether the family are confident raising any concerns directly with the landlord (with assistance from an interpreter) or whether they would prefer to raise any issues via the group.

The welcome booklet you compile for the resettled family could include information about your group, how and when you can be contacted, what to do in the event of an emergency and important local information. You may also want to include details about how to operate facilities in the house (e.g. heating, hot water, etc.). In the event that the resettled family are not literate in their first language you may want to consider using pictorial diagrams in your booklet.

The sponsor group is responsible for the resettled family's accommodation for the entire two-year period following their arrival in the UK. You will be expected to work with the family to support understanding of social welfare, banking, budgeting, house contracts and rents and to secure a smooth transition to sustainable accommodation after two years if required.

Annex A: Police Consultation Form

Refugee Resettlement: Community Sponsorship request for police consultation: Consultation form

Purpose of this form

This form should be used to record the details of the potential sponsor, proposed property and area to house a refugee family along with the police comment on this potential address. Please see accompanying background note for further information.

Process

Once you have provided the Community Sponsorship Team at the Home Office the address of the property and contact for the local police, they will complete **Part A** of the form before sending it on to the local police Safer Neighbourhood Team (or equivalent police team).

Once received, the **local police Safer Neighbourhood Team** (or equivalent police team) should complete **Part B within 7 working days of receipt** using their local knowledge of any known issues of concern such as community tension/anti-social behaviour/hate crime that could impact the wellbeing/integration of a refugee family into the area and then email the completed form to the Home Office Community Sponsorship Team at the following address: **communitysponsorship@homeoffice.gov.uk**

If you have any questions or feedback on this form or process, please contact the Community Sponsorship team at communitysponsorship@homeoffice.gov.uk

Part A - To be completed by the Community Sponsorship Team

Community Sponsor name and address		
Lead Sponsor name and telephone number		
Full address of property identified to house refugee family		
Date Part A completed		
Please note – Any information provided may be shared with other statutory agencies and held in line with GDPR principles where appropriate.		

<u>Part B</u> – To be completed by local police Safer Neighbourhood team (or equivalent police team) <u>within 7 working days</u> of receipt

Are there any significant community tensions in the area which may affect the suitability of the property?	Yes 🗌
	No 🗌

Are there any significant implications for crime and community safety that could preclude the use of the property?	Yes 🗌
	No 🗌
If yes, please provide further details – what are your concerns and is there a way to mitigate the risk?	
Where details are provided above, are you content for this information to be shared with the community sponsor?	Yes 🗌
	No 🗌
Would you advise any specific proactive community engagement prior to housing a refugee family in this area?	Yes 🗌
If yes, please provide further information: e.g. Talking to community groups, multiagency assessments, support package, pre-arrival briefing, community orientation etc.	No 🗌
Overall, from a policing perspective, do you have any concerns about a refugee family being housed at the suggested address?	Yes 🗌
	No 🗌
Additional comments – Please ensure as much information as possible is shared to allow a full assessment by the Home Office. This is also to ensure extra support and advice is appropriately provided where necessary.	
Name and role of completing officer	
Contact number for completing officer	
Date Part B completed	

Policing teams should also contact their local Diverse Communities team (or equivalent) and Divisional/Force Intelligence teams before returning the form. They may have relevant anecdotal information not recorded on local systems. This could include information from local groups within the community or positive outcomes such as local support groups. They may also be able to provide information on unreported crimes within the community.

It would be difficult to be prescriptive on how wide, and the types of checks to be completed by each individual force. As a minimum it is suggested that the crime type (e.g. anti-social behaviour, hate crime) is reviewed in the general area, to allow a holistic overview for safeguarding purposes.

Where the risk is deemed to be low, local checks may suffice. Where migration is currently high, a more detailed problem profile may need to be considered.

It is anticipated that no personal information will be shared with the community sponsor. If you have any concerns with the information you are sharing you should refer to force policies in line with GDPR.

When <u>both</u> Part A and B are complete, the local police Safer Neighbourhood Team (or equivalent police team) should email this form to the Home Office Community Sponsorship team using the following email address: <u>communitysponsorship@homeoffice.gov.uk</u>. Once the Home Office receives this completed form, it will be reviewed with the community sponsor's application.

Annex B: Safeguarding Policy Guidance and Template for Sponsors

Guidance

All community sponsorship groups members must have a copy of the safeguarding policy which is accessible to all volunteers. Your local authority must have been given the opportunity to view your safeguarding policy as part of the application process.

As part of your application for approval to be a community sponsor, you must prepare and submit a safeguarding policy. This is assessed as part of the application process for the purpose of ensuring that you are adequately prepared to provide a safe and supportive environment for a vulnerable resettled family.

The purpose of this guidance is to help you develop clear and effective safeguarding policies that will stand them in good stead to provide a safe and supportive environment for a vulnerable resettled family.

A safeguarding policy for community sponsorship should be concise, easy to understand, and should ideally be encompassed in a single document (or two in the case where adult and child safeguarding policies are separate).

When developing or reviewing your safeguarding policy, we recommend:

- speaking with your local authority
- making contact with the local police safer neighbourhood team and including their contact details in the policy
- making contact with local refugee/faith groups and including contact details in the policy
- following the NSPCC guidance regarding children - https://learning.nspcc.org.uk/safeguarding-child-protection/writing-a-safeguarding-policy-statement
- reviewing guidance available from your local authority or online regarding the safeguarding of vulnerable adults
- including information on Prevent e-learning training for employees/volunteers (https://www.elearning.prevent.homeoffice.gov.uk/)
- preventing individuals from being drawn into serious and organised crime: https://www.gov.uk/government/publications/individuals-at-risk-of-being-drawn-into-serious-and-organised-crime-a-prevent-quide
- · keeping it clear and simple so everyone can understand and follow it.

Your safeguarding policy should, as a minimum, include the following elements:

- cover children and vulnerable adults
- identify the potential risks to children and vulnerable adults
- staff and volunteer hiring and vetting
- how staff and volunteers are trained
- setting clear expectations for staff and volunteers working with children and vulnerable adults (e.g., when working alone)
- managing allegations about staff and volunteers
- · clear process for how concerns are reported and managed
- where staff and volunteers can seek more information and guidance on safeguarding.

Safeguarding policy template

The below template sets out potential areas to consider when developing your safeguarding policy. Responsibility for safeguarding still rests with the Lead Sponsor and community sponsorship group, however, so you will need to tailor this template to reflect the specific safeguarding needs of those you support as well as your group's respective policies, procedures, and standards. It is essential that if you choose to use this template, you edit it to reflect the way in which your group operates, including the way in which you recruit members.

The template includes instructional text [in square parentheses]. It should be used in conjunction with our 'Safeguarding policy - guidance for sponsors'.

Introduction

[Insert here a brief description of what your group does.]

What is safeguarding?

Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live in safety, free from harm, abuse and neglect.

Our safeguarding policies and procedures are intended to prevent abuse and neglect, not simply to give information on how to spot and report abuse.

Purpose of this document

This document has been produced for the following reasons:

- To be clear to all about our commitment to ensuring that all those supported are safe in their contact with [insert name of your group].
- To outline our policy to ensure they are safe.
- To outline our procedures for responding if there is a concern.
- To provide further information where help and advice can be received for dealing with specific situations.
- To ensure group members and staff who work with those we support are aware of their role and responsibilities.
- To enable us to provide information easily to members of the community who wish to know our arrangements for keeping people safe.

This document has been developed using materials produced by [insert as appropriate]. It is not available for copying by other groups or organisations without prior written consent.

Our safeguarding policy

[Your safeguarding policy must include an explicit statement which demonstrates your commitment to safeguard, protect and promote the welfare of those you support. Potential wording is set out below.]

- We recognise that the welfare and safety of those we support is paramount in all the work we
 do. Those we support should not experience distress, harm, or abuse of any kind as a result
 of our actions or those of partner agencies.
- Our commitment to safeguarding, protecting, and promoting their welfare applies to everyone we support, regardless of age, disability, gender, race, religion or belief, or sexual orientation.

Scope

[Potential wording is set out below.]

[Insert name of your group] intends to safeguard those we support from the following types of abuse: physical, sexual, psychological, emotional, financial, neglect, discriminatory, institutional, and self-neglect. There is further information on categories, signs, and definitions of abuse in the appendices.

Abuse and neglect are forms of maltreatment. Someone may abuse by inflicting harm and neglect by failing to act to prevent harm. Individuals may be abused in a family, institutional, or community setting, by those known to them, or by a stranger. They may be abused by an adult, a child, adults or children, or both adults and children.

The emphasis in our work with adults is to promote their empowerment and well-being through the support we provide and to act in a way which supports the rights of individuals to lead a life based on self-determination and personal choice as well as recognise those people who are unable to take their own decisions or protect themselves and their assets.

This policy applies to anyone working on behalf of [insert name of your group], including [insert all your different types of group members and staff be they, for example, trustees, senior managers, paid staff, volunteers, sessional workers, agency staff, or students].

Implementing our safeguarding policy

[Your policy must include explicit reference to the following areas. Further guidance and potential wording are provided below.]

Recruitment and vetting

[Explain your group's policies and practices in terms of group members and staff recruitment and vetting, including your approach to Disclosure and Barring Service checks. Where these are already set out in separate documents, summarise the main points here and either insert the relevant hyperlinks (where published) or attach them as appendices. Where separate documents are not already in place, you may wish to use the below suggested wording.]

For group members and staff who directly encounter those we support, our recruitment process includes:

- Providing a role description relevant to the work they will undertake.
- Providing a document explaining the ethos, values and practices of [insert name of your group].
- Providing relevant guidelines or policies.
- An informal interview.

- A formal interview for staff.
- Completing the following declaration 'I understand the nature of the work I am to do. I have read the relevant guidelines. I agree to work within the safeguarding policies for those the group supports. I understand that I have responsibilities to share concerns and act in accordance with these policies. I understand that as part of [insert name of your group], we together seek to create a safe and caring culture.' In addition, they are asked about criminal convictions.
- Providing 2 references.
- Undergoing a Disclosure and Barring Service (DBS) check where the role meets the set criteria.

For group members and staff who do not directly encounter those supported by [insert name of your group], we will require one reference.

DBS checks and references

[Insert name of your group] aims to have completed DBS checks and to have references in place prior to group members and staff starting work with those we support. [Insert name of your group] will consider whether DBS checks are appropriate based on the level and nature of the work being undertaken by individual group members and staff. If references or criminal records checks are delayed, group members and staff may work with those we support under supervision which includes never being alone with a person in our care who has specific needs.

Training

[In a clear and concise way, explain how group members and staff are trained to recognise indicators of abuse and report any safeguarding, protection or welfare related concerns they have about those (both adults and children) they support. This should include the training provided by Reset through their online resources and face-to-face training. You should also state how and by whom records of this training are kept.

Group members and staff must be alerted to types of child abuse (see appendix A) that may be specific to certain cultures, such as female genital mutilation, forced marriage, and faith-based abuse. While these types of abuse are not necessarily common amongst refugees, group members and staff do need to know how to recognise risk indicators. In addition to culturally specific practices, group members and staff need to be aware of indicators of domestic abuse and how to refer to children's services any child who may witness or be the victim of this.

It is not necessary to list all possible concerns or indicators in this safeguarding policy, but you can either insert hyperlinks (where published) to any relevant supporting documents that provide additional detail or attach them as appendices.]

Reporting adult safeguarding concerns

[You must demonstrate here that there is a clear process for reporting adult safeguarding concerns within your group and managing any subsequent referral to relevant statutory agencies in a timely and effective manner. A suggested flowchart for reporting concerns and making a referral is at appendix C.

You must also explicitly state how group members and staff appropriately explain to those they support the circumstances in which safeguarding related intervention could be made by statutory agencies and the subsequent relevant procedures. Potential issues that may trigger such interventions include, but are not limited to:

- Domestic abuse including evidence of violence and patterns of controlling, coercive or threatening behaviour.
- Financial abuse, such as benefit payments received being controlled by one family member and used for their sole benefit rather than equally distributed.]
- Hate crime any criminal offence which is perceived by the victim, or anybody else, to be
 motivated by hostility or prejudice towards someone's race, religion, sexual orientation,
 transgender identity, or disability.]

Radicalisation

[You must explicitly state here your commitment to ensuring that group members and staff are aware of relevant local and national programmes for preventing people from being drawn into terrorism. In England, Scotland, and Wales, for example, this includes making sure that group members and staff are familiar with the Prevent programme and are clear that they must report to the respective local authority any concerns they have about a person's potential radicalisation. It is an obligation for you to include links to radicalisation and preventing organised crime in your policy as a Community Sponsor, see links below.

The purpose of Prevent is to safeguard vulnerable people from becoming terrorists or supporting terrorism, by engaging with people who are vulnerable to radicalisation and protecting those who are being targeted by terrorist recruiters. Prevent aims to:

- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
- Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to disengage and rehabilitate

The Prevent programme depends on leadership and delivery through a wide network of partners - with communities, civil society organisations, public sector institutions including local authorities, schools and universities, health organisations, police, prisons and probation, and the private sector. Through identification and early intervention, vulnerable individuals who are at risk of radicalisation can be safeguarded and supported. Referring possible cases of early stage radicalisation works in a similar way to safeguarding processes designed to protect people from gang activity, drug abuse, and physical or sexual abuse. Success means an enhanced response to tackle the causes of radicalisation, in communities and online; continued effective support to those who are vulnerable to radicalisation; and disengagement from terrorist activities by those already engaged in or supporters of terrorism.

Further information about Prevent can be found at: www.gov.uk/government/publications/prevent-duty-guidance

Information on what happens when a Prevent referral is made can be found at: https://homeofficemedia.blog.gov.uk/2019/11/05/factsheet-prevent-and-channel/

Information on how to prevent individuals from being drawn into serious or organised crime can be found at:

https://www.gov.uk/government/publications/individuals-at-risk-of-beingdrawn-into-serious-and-organised-crime-a-prevent-guide]

Designated safeguarding lead

[While safeguarding responsibilities apply to all your group members and staff, your policy must provide details here of your group's governance arrangements, including a named person in senior management who has been appointed as the designated lead who has ultimate responsibility for safeguarding within your group and a brief description of their role. A deputy safeguarding lead may also be listed.]

Responding to allegations about group members and staff

[Though mindful that in some cases there may first need to be a police investigation or an investigation conducted by local authority statutory social care services, it is essential that all safeguarding related concerns and allegations about a group member or staff are immediately acted upon.

Your safeguarding policy needs to explicitly state that all group members and staff must immediately report any safeguarding related allegations or concerns they have. Your policy must be clear as to how service users can raise concerns and complaints, to whom these allegations or concerns are reported, how they are handled by the group, and where responsibility lies for notifying respective statutory agencies. You should also concisely summarise here your complaints management policy and any allegations policy you have in place setting out how these are managed and either insert hyperlink(s) (where published) to the relevant document(s) or attach as appendices. This may include, for example, any whistleblowing policy in place.]

Information sharing

[You need to demonstrate that there is a policy in place for ensuring that group members and staff are aware of their responsibility to appropriately manage confidential information about those they support. This includes, for example, not sharing confidential information about a family with others, both within and outside the group. It could also include details of processes in place for securely storing all personal paper and electronic records such as locking access to these records and never keeping related papers in personal storage.

Your policy must also demonstrate that your group manages information in line with relevant data protection legislation and guidance (such as the Data Protection Act 2018 and the European Union General Data Protection Regulation which came into effect in May 2018) and the Data Sharing Protocol at Schedule 4 of the Sponsor Agreement which provides a set of principles for sharing and handling information classed as 'personal data'.

It is essential you remember here that data protection legislation and human rights laws are not barriers to justified information sharing, rather they provide a framework to ensure that personal information about people is shared appropriately. Further advice on effective information sharing is available at:

ico.org.uk/for-organisations

- <u>www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice</u> (see the seven golden rules to sharing information at page 4)
- www.gov.uk/government/publications/caldicott-information-governance-review-department-of-health-response (see page 5 on the revised Caldicott principles).]

Code of conduct

[Explicitly state here that a code of conduct must be signed by all group members and staff and retained on their personnel file.

While the code of conduct is likely to be a separate document rather than inserted into this policy, you could include a hyperlink to the blank template (where published) or include it as an annex.

In addition to containing a stated expectation that it is adhered to by all group members and staff, the code of conduct should, as a minimum, include:

- Explicit reference to all group members and staff seeking, at all times, to living out and modelling your group's values and ethos.
- Your group's commitment to actively preventing the exploitation or abuse of those you support. This may include, for example, the responsibility of your group members and staff to place the safety and well-being of those you support before loyalty to friends and colleagues as well as any personal or group goals.
- The requirement for group members and staff to be familiar with and follow safeguarding arrangements, recognising that everyone has responsibilities here (not only those who directly work with those your group supports).
- Your group's commitment to cultural competency. This means your group members and staff respecting the culture of those they support and learning as much as possible about how family behaviours may have different cultural interpretations. It also means the people your group supports being made aware of the social and cultural norms of behaviour they are expected to meet in the UK, and the statutory obligations that underpin these norms, building on the Cultural Competency training provided in host countries commissioned by the UK Government. Learning about these behavioural norms and incorporating them into their day- to-day lives will help people your group support successfully adapt to contemporary British society.
- The need to avoid situations that may be misunderstood by others, both within and outside of your group. This may include information, for example, on how your group manages lone working.
- Guidance for group members and staff on forming appropriate relationships with those they
 support which are based on mutual trust and respect. Group members and staff need to be
 aware of issues relating to potential abuse of trust, so this guidance should include specific
 advice on responding appropriately to family requests or demands for personal favours
 outside the group's resettlement responsibilities.
- A clear expectation that group members and staff notify the group in writing when they
 decide to leave their role but wish to be friends with family members. In these circumstances,
 the group must notify those supported that the leaving group or staff member is now acting
 solely as a friend while the person leaving the group must continue to respect the
 confidentiality of personal information of those that they are aware they have supported
 through their role in the group.

Your code of conduct should also include specific sections on boundaries, pastoral care and decision making. Potential wording is set out below.]

Boundaries

Group members and staff must discuss appropriate boundaries with [insert appropriate designated lead here] prior to working with those we support. Boundaries may include:

- Personal details.
- Contact details of the group member or staff and use of phone.
- Physical contact or personal care.
- Specific issues relating to the group member and staff or person supported (disabilities, for example).
- Anything that results in over-dependence on the group member or staff.

Group members and staff must behave consistently and appropriately, ensuring that nothing occurs that could be misinterpreted or misunderstood.

Resettlement and integration support

Community Sponsorship Group members are likely to hold an actual or assumed position of authority over those they support. There is, therefore, an increased risk of abuse occurring, be that emotional, physical, financial, spiritual, sexual, domestic, discriminatory, or organisational. Where pastoral care and friendship overlaps, there can emerge a conflict of roles and blurring of boundaries for all parties. Group members and staff involved in pastoral care therefore need to:

- Avoid any behaviour that may give the impression of favouritism or a 'special' relationship.
- Clearly define any mentoring or counselling roles.
- Be aware of the dangers of over-dependency (can be both ways).
- Be aware of own limitations.
- Avoid making decisions for the people you support.

Where a person displays challenging behaviour or exhibits obsessional-type interest in spiritual or other matters, you should act with caution and careful discernment before accessing any spiritual advice or ministry.

Decision making

Everyone must be treated in a way that respects their individuality and does not undermine their dignity or their human or civil rights. This includes allowing them to make informed decisions and taking the greatest possible control of all aspects of their lifestyle. In the Mental Capacity Act 2005, all individuals are assumed to have capacity to make informed decisions unless there is clear evidence to the contrary. This includes the right that individuals retain to make what might be unwise decisions. Group members and staff need to avoid taking decisions for those we support, however inadvertent or well-meaning. Where group members and staff cannot support decisions made, or have any concerns related to decision-making, including any doubts regarding capacity to make decisions, they must report to [insert appropriate designated safeguarding lead(s)].

Digital

[Your digital approach should include explicit reference to group members and staff being alert to possible digital exploitation as well as how they can help those they support understand these risks and know how to report them.]

Transport

[As part of your support, you may offer driving or transport services to those you support, so it is essential that your commitment to safeguarding, protecting, and promoting their welfare is adequately addressed in your transport policy. Concisely summarise here how safeguarding is covered in your transport policy and either insert hyperlink(s) (where published) to the relevant document(s) or attach as annexes.]

First aid and medical issues

[Potential wording is set out below.]

Emergency situations must be dealt with by the emergency services. First Aid should be administered only by trained group members and staff where available.

Contact with people who use our services outside of [insert name of your group] [Potential wording is set out below.]

Don't invite anyone who uses our services to your home alone. Where a person we support initiates a request to visit your home, clarify the reason for the request, decline (preferable) or make arrangements only after taking appropriate advice [from, for example, your Lead Sponsor or your group's designated safeguarding lead(s)]. Where a person we support visits your home without warning, do not, if you are alone, invite them in. If there is another adult present, make sure the person's visit is short. Make alternative arrangements where a long conversation is required.

Telephone, Text, Internet, and Email contact

[Potential wording is set out below.]

When using technology such as text, email or instant messaging, group members and staff should follow the below guidelines:

- A record of significant messaging, emails or text conversations, stating with whom and when they communicated should be immediately emailed to [insert appropriate designated lead here].
- Save conversations, emails and text messages as text files where possible and make the person aware that you are doing this.
- Use technology at appropriate times, agreeing lengths of time and curfews.
- Pass on or show any texts, emails or conversations that raise concerns to [insert appropriate designated lead here].
- Use clear language, avoiding words or abbreviations which might be misinterpreted.

Photographs

[Potential wording is set out below.]

To protect the privacy of those we support and avoid unwelcome publicity, you must avoid producing photographs, video, or any other media involving them without their explicit consent.

Risk assessments

[Potential wording is set out below.]

Appropriate risk assessments are undertaken by [insert name of your group]. If concerns around group or family safety arise, then a risk assessment for home and external visits should be considered. In addition, individual group members and staff may be asked to conduct their own risk assessments. For more information, contact your Lead Sponsor or designated safeguarding lead(s).

Review and assurance

[It is vital your group's safeguarding policy and related procedures and practices referred to in this document are subject to regular review (annually at the very least, and when any significant change happens), so that group members and staff know about and can follow these confidently and competently. Summarise here the arrangements your group has in place to ensure this, including relevant review timeframes.]

Children

[Further to guidance provided elsewhere in this document, your policy must include explicit reference to the following areas regarding children.

Scope

[Potential wording is set out below.]

[Insert name of your group] intends to safeguard children we support from the following types of abuse: physical, sexual, psychological or emotional, financial, neglect, discriminatory, institutional, and self-neglect. There is further Information on categories, signs, and definitions of abuse specific to children at appendix A.

Abuse and neglect are forms of maltreatment. Someone may abuse by inflicting harm and neglect by failing to act to prevent harm. Individuals may be abused in a family, institutional, or community setting, by those known to them, or by a stranger. They may be abused by an adult, a child, adults or children, or both adults and children.

Promoting children's welfare includes creating opportunities to enable those we support to have optimum life chances in adulthood, namely:

- Physical and mental and emotional health and wellbeing.
- Protection from harm and neglect.
- Education, training and recreation.
- The contribution made by them to society.
- Social and economic wellbeing.

Reporting child safeguarding, protection, and welfare related concerns [Potential wording is set out below.]

You must immediately make a safeguarding referral to local authority children's services where you identify a child who is at risk of abuse, has come to harm, or needs care and support. Always contact the police first in an emergency or where a crime has taken place.

[You must demonstrate here that there is a clear and specific process for reporting child safeguarding, protection and welfare related concerns within your group and managing any subsequent referral to relevant statutory agencies in a timely and effective manner. A suggested flowchart for reporting safeguarding concerns and making a referral is at appendix C.

You must also explicitly state how group members and staff appropriately explain to those they support the circumstances in which a child safeguarding related intervention could be made by statutory agencies and the subsequent relevant procedures. Potential child specific issues that may trigger such interventions include, but are not limited to:

- Physical punishment of children, including slapping or hitting.
- Leaving children under the age of 12 alone at their place of residence.
- Non-attendance at school for children aged 5-16 years.
- Leaving children in the care of people who are not well known to the family.
- Unrestricted access to the internet for children.]

Digital

[Children must not be able to access inappropriate websites or inappropriately share personal information. To help address this, your policy should explicitly state here that group members and staff must ensure there is adequate supervision whenever an activity requires them to use the internet with children.

Your digital approach should also include explicit reference to group members and staff being alert to the possible digital exploitation of children as well as how they can help those they support understand these risks and know how to report them.]

Personal Care

[Potential wording is set out below.]

Privacy must always be respected. Young children may be taken to the toilets (with parental permission), but the group member or staff must not invade their privacy. Where a child soils themselves, the parent(s) or carer(s) should be asked to clean the child. Where the parent(s) or carer(s) are not available or cannot assist without delay, the group member or staff shouldn't manage this situation alone. Remember to maintain the child's dignity, privacy and feelings. Inform the parent(s) or carer(s) of the situation.

First aid and medical issues

[Potential wording is set out below.]

Emergency situations must be dealt with by the emergency services. First Aid should be administered only by trained group members and staff where available. Care needs to be taken when dealing with a minor situation involving children, with the following considered: parent(s)' or carer(s)' availability to deal with the situation; not being alone with a child; the child's dignity and privacy; the child's views; allergies and reactions.

Physical contact

[Potential wording is set out below.]

Never initiate physical contact with a child. Inappropriate physical approaches must be discouraged. Reject the physical expression, not the person. Young children who are hurt or upset may need comfort, but this should be minimal, appropriate and not hidden. The child's wishes must be considered.

Our safeguarding partners

[List here all partner agencies (including respective contact details) your group works with to safeguard, protect and promote the welfare of those you support. This could include, but should not be limited to, local authority social care services (children's and adult), neighbourhood policing teams, and, where relevant, safeguarding leads from respective school(s) and health care services.]

Supporting documents

[Signpost here (inserting hyperlinks where appropriate) any related policies or procedures produced by your group which have not already been referred to elsewhere in this document. You can also signpost advice provided by your group's safeguarding partners, other relevant organisations (such as the NSPCC) and guidance published on GOV.UK].

Commencement

Prior to commencement, this policy was shared for comment with [insert named contacts from local authority social care services] on [insert date].

[Summarise here any response your group received from these local authority contacts. Also explicitly state where the local authority chose not to comment or review this policy.]

This safeguarding policy came into force on [insert date in **bold**].

Signed: [insert name].

[This policy must be signed by your group's Lead Sponsor and designated safeguarding lead(s) or, in exceptional circumstances, your deputy safeguarding lead(s).]

Appendix A - Categories, signs, and definitions of child abuse

Categories of child abuse are described in <u>Working Together to Safeguard Children</u> (2018) from which the following definitions are taken. [Groups based or operating in devolved administrations should be aware of their equivalent guidance here. Groups in Northern Ireland, for example, should refer to guidance provided by the Safeguarding Board for Northern Ireland, while those in Scotland should be aware of the national guidance for child protection. Groups in Wales should refer to the codes of practice and statutory guidance on working together to safeguard people.]

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical signs

• Bruises, black eyes and broken bones are obvious signs of physical abuse, but they are not the only ones.

Other signs include:

- Injuries that the child cannot explain or explains unconvincingly.
- Untreated or inadequately treated injuries.
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen.
- Bruising which looks like hand or finger marks.
- Cigarette burns, human bites, scalds and burns.

Behavioural signs

Sometimes if a child is being physically abused they may show changes in behaviour, such as:

- Sad, withdrawn or depressed.
- Having trouble sleeping.
- Behaving aggressively or being disruptive.
- Showing fear of certain adults.
- Showing lack of confidence and low self-esteem.
- using drugs or alcohol.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and

technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Physical signs of sexual abuse

- Pain, itching, bruising or bleeding in the genital or anal areas.
- Genital discharge or urinary tract infections.
- Stomach pains or discomfort walking or sitting sexually transmitted infections.

Behavioural signs of sexual abuse

- A marked change in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically.
- A young person may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected.
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities.
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age.
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person.

Neglect

The persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's 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.

Physical signs

Abandonment.

- Unattended medical needs.
- Consistent lack of supervision.
- Constant hunger, inappropriate dress, poor hygiene.

Behavioural signs

- Regularly displays fatigue or listlessness, falls asleep in sessions.
- Steals food, begs from others.
- Reports that there is no carer at home.
- Frequently absent or late.
- Lice, distended stomach, emaciated.
- Inadequate nutrition.
- Self-destructive.
- Extreme loneliness and need for affection.
- School dropout (adolescents).

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Physical signs

- Speech disorders.
- Delayed physical development.
- Substance abuse.
- Ulcers, severe allergies.

Behavioural signs

- Habit disorder (sucking, rocking, biting) antisocial, destructive.
- Neurotic traits (sleep disorders, inhibition of play).
- Passive and aggressive behavioural extremes.
- · Delinquent behaviour (especially adolescents).
- Developmentally delayed.

Extremism

Extremism goes beyond terrorism and includes people who target the vulnerable (including the young) by seeking to sow division between communities based on race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremis.

Appendix B - Categories of abuse experienced by adults

The Care Act 2014 recognises 10 categories of abuse that may be experienced by adults. These have been summarised by The Ann Craft Trust as follows: (https://www.anncrafttrust.org/resources/types-of-harm/)

Self-neglect

This covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.

Modern Slavery

This encompasses slavery, human trafficking, forced labour, and domestic servitude.

Domestic Abuse

This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called 'honour' based violence.

Discriminatory

Discrimination is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.

Organisational

This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home. Organisational abuse can range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Physical

This includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.

Sexual

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.

Financial or Material

This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.

Neglect and Acts of Omission

This includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.

Emotional or Psychological

This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

The Ann Craft Trust has identified four additional types of harm, while not included in the Care Act 2014, it believes are relevant to safeguarding adults. These are:

Cyber Bullying

Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

Forced Marriage

This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

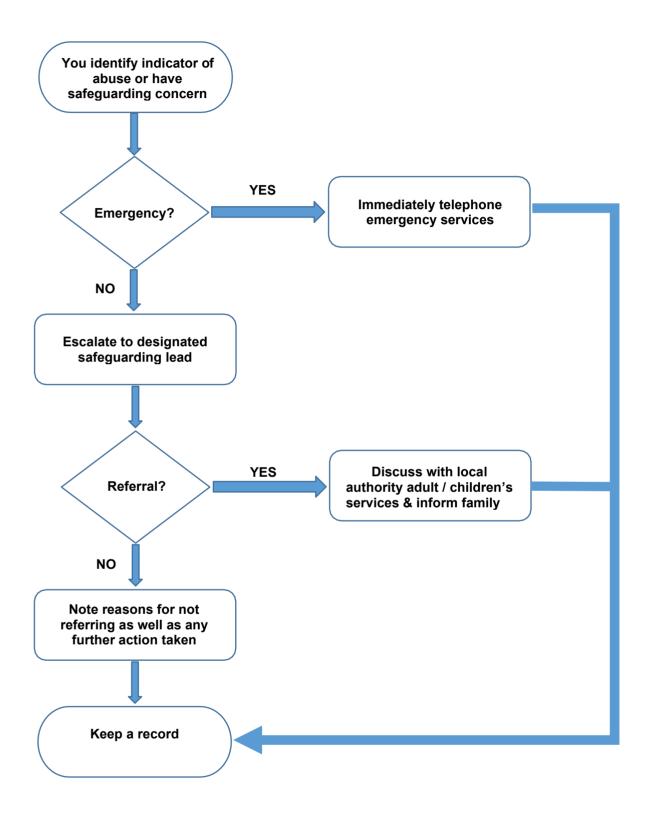
Mate Crime

'mate crime' is when a vulnerable person is befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of multi-agency safeguarding reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.

Radicalisation

The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.

Appendix C: Flowchart for reporting safeguarding concerns (relating to adults or children)



Annex C: Complaints Handling Guidance

Community Sponsorship Scheme

[Sponsoring organisation name] Complaints policy and procedures template

[Sponsoring organisation name] views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the individuals that has made the complaint.

What is this policy for?

Our policy is:

- To make it easy for a resettled refugee to report a complaint
- To provide a fair and timely complaints procedure
- To make sure everyone providing resettlement support knows what to do if a complaint is received
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired
- To gather information which helps us to improve on the services provided as part of the sponsorship agreement

What is a complaint?

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of care provided as part of the sponsorship agreement.

This will include complaints about:

- The people who are responsible for providing direct support to the family placed in the care of [Sponsoring organisation name]
- The quality of the support received
- Other service providers (e.g. relating to accommodation, interpreters, medical or English Language tuition providers) □
- This will exclude complaints made by:
 - o Volunteers
 - Other service providers
 - Members of the public

(These are the subject of a separate policy)

It does not include complaints by members of the resettled family about other members of their family, which would be dealt with through the safeguarding Policy.

Who can make a complaint?

Complaints may come from any member of the resettled family placed in the care of the sponsoring group. A complaint can be received verbally, by phone, by email or in writing. This policy is strictly for complaints from members of a resettled family and does not cover complaints from volunteers or staff providing resettlement care.

How are details of a complaint handled?

All complaint information will be handled sensitively and with care and confidentiality, telling only those who need to know and following any relevant data protection requirements.

Complaints Procedure

How should a complaint be made?

Verbal Complaint

A verbal complaint should be made at the earliest opportunity to [insert the name of the nominated complaints officer].

If this is not possible or is inappropriate to do so due to the nature of the complaint, the complainant should contact [insert the name of the Lead Sponsor].

Telephone Complaint

A telephone complaint should be made at the earliest opportunity by calling [insert name of the nominated complaints officer] on [insert phone number]. These details are also included in the family Welcome Pack.

If this is not possible or is inappropriate to do so due to the nature of the complaint, the complainant should contact [insert the name of the Lead Sponsor] on [insert number].

Written Complaint

A complaint should be made in writing, at the earliest opportunity via email to [insert email address] or by letter to the following address: [insert address here]

How should a complaint be responded to?

Complaints received verbally or by telephone should be written down immediately, and a secure record kept. The person receiving the complaint should:

- Record the complainant's name, address and contact telephone number
- Write down the facts of the complaint
- Remind the complainant of the complaints procedure
- Advise the complainant what will happen next and give an idea of timescales
- If possible, and where appropriate, ask the complainant to follow up by providing a written account of the complaint in their own words

Complaints will receive an initial response by telephone within 24 hours or by the next working day. This should be followed by a written response, including all the above as well as the name and contact details of the person assigned to handle the complaint.

Resolving a complaint

- i) In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the person receiving the complaint feels they may be able to resolve the complaint swiftly they should do so if possible and appropriate.
- ii) Whether or not the complaint has been resolved, the complaint information should be passed to [state who complaints should go to] within 48 hours.
- iii) On receiving the complaint, [person who complaints go to] records it in the complaints log. If it has not already been resolved, they will delegate an appropriate person to investigate it and to take appropriate action.
- iv) Complaints should be acknowledged by the person handling the complaint within 48 hours. The acknowledgement should say who is dealing with the complaint and when

the person complaining can expect a reply. A copy of this complaints procedure should be attached

- v) If the complaint relates to a specific person, they should be informed and given a fair and timely opportunity to respond as part of any investigation.
- vi) Ideally complainants should receive a definitive written reply within 10 working days. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.
- vii) Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.
- viii) If the complainant feels that the problem has not been satisfactorily resolved, they can ask for the complaint to be escalated

Responding to an escalated complaint

If the complainant feels their complaint has not been satisfactorily resolved following the initial investigation, they can request it is escalated. At this stage, the complaint will be passed to [state who will be responsible for handling escalated complaints]. The request for escalation [how should this be made and to whom] should be acknowledged within 48 hours of receiving it.

The designated person should acknowledge receipt of the complaint in writing and advise the complainant how their appeal will be handled.

The designated person may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve reviewing the paperwork of the case and speaking with the person who dealt with the initial complaint.

The same process outlined in v) – vii) above should be followed.

Any individuals who dealt with the original complaint should be kept informed and given ample opportunity to explain the reasons for the original decision.

The decision taken at this stage is final, unless it is appropriate to seek external assistance with resolution. [State who may make this decision for external resolution and from whom resolution will be sought]

Variation of the Complaints Procedure

The Lead Sponsor [insert name] may vary the procedure for good reason. This may be necessary to avoid a conflict of interest, for example, a complaint about a person who is responsible for reviewing a complaint.

Monitoring and Learning from Complaints

Complaints are reviewed [state frequency] to identify any trends which may indicate a need to take further action.

Language Translation

A copy of this complaints policy is made available to the resettled family in their own first language. This will be included as part of their welcome pack provided on their arrival at their new home.

Translation into the appropriate language is also provided, as necessary, both for the complaint itself and for subsequent communications during the complaint process, including the final response.

Who is responsible for this policy?

Overall responsibility for this policy and its implementation lies with the lead sponsor [insert name].

Policy Approved by:

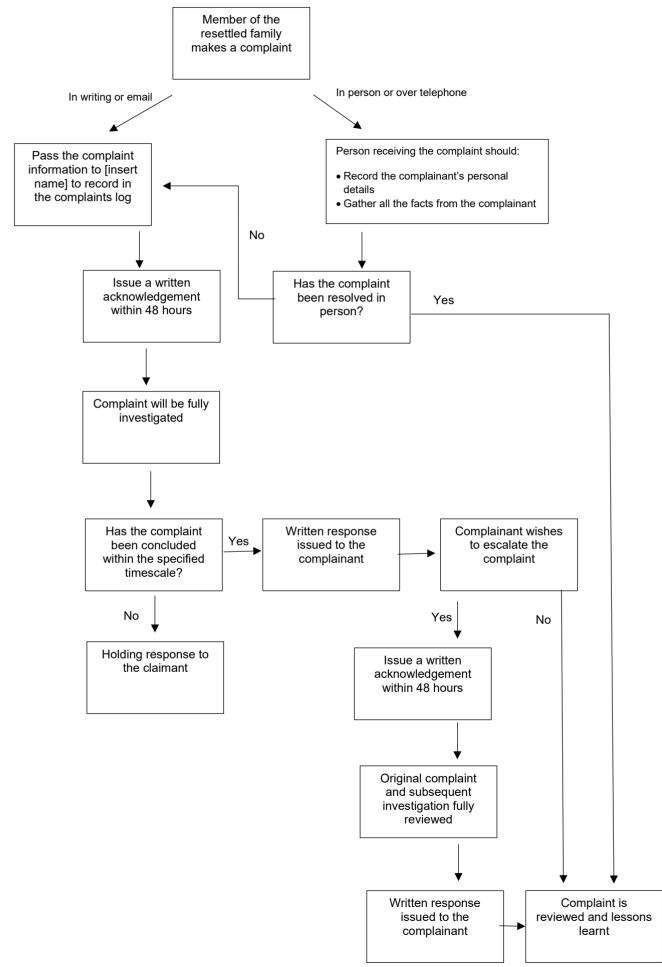
Lead Sponsor of [insert organisation name]

Date of Approval:

This policy is reviewed regularly and updated as required.

Policy Review Date:

Appendix A – Complaint Process



Appendix B - Complaint form

This form is to help you and us have a record of what the problem is and when it happened.

Name of person(s) making the Complaint	Date of complaint	
	this had a sint a set to a set	
Reason for complaint (please be as detailed as posspossible)	sible, bullet point each issue if	
Below to be filled in by [sponsor organisation] memb		
Person(s) receiving complaint	Date Complaint received	
Steps taken to resolve the complaint, time frame, feedback and learnings, give copy to complainant		

Annex D: Statement of Requirements for Sponsors

Accommodation

Aim: Resettled family has a home in which to settle in the UK, with adequate space and facilities to live in comfort.

Sponsors are required to source suitable and sustainable accommodation, available for use by the resettled family for a minimum period of two years with a two-year lease. The accommodation must:

- be available to the resettled family at a cost that is affordable and sustainable, taking into account the social welfare income the family will receive
- have independent access and provide adequate privacy
- comply with local authority guidance on occupation levels
- be in a proper state of structural repair, maintained throughout in a good state of repair
- have safe electricity and/or gas supplies, and with adequate ventilation and lighting.

The property should be appropriately furnished with:

- an appropriate number and type of beds
- a toilet, a washbasin and a fixed bath or shower with hot and cold water
- a fixed heating appliance in each room, which is capable of providing effective heating and which the tenant can control
- facilities for cooking and for the hygienic preparation and storage of food (for example, a 4-ring hob with oven and grill, fridge-freezer, microwave oven, and kitchen sink)
- access to washing facilities (e.g. a washing machine or nearby launderette);
- access to facilities to dry clothes (e.g. outdoor clothes line or indoor clothes drying rack)
- a fire blanket and smoke alarms (including a carbon monoxide alarm where appropriate).

The Sponsor must provide:

- assistance with registration with utility companies and making sure arrangements are made for payment (no pre-pay/card accounts)
- information to resettled persons on the accommodation, health and safety, and an emergency contact point.

Welcome to the UK

Aim: Resettled family members feel welcome in the UK and are able to quickly acclimatise to living in the UK.

Sponsors are required to:

- meet and greet arriving family from the relevant airport and escort them to their accommodation, briefing them on how to use the amenities
- provide a welcome pack of groceries, the content of which should take into account the culture and nationality of the resettled family
- provide £200 per person (adults and children) in cash on arrival for initial expenses including groceries, toiletries, clothes, and ensure the family have sufficient funds to live on while their claim for benefits is being processed (e.g. for a family of five the sponsor would provide £1,000)

 provide information and support to access local shops, services, and transport.

Establishing a Life in the UK

Aim: Resettled family are empowered to make a life for themselves and integrate in the UK, through accessing community activities, medical care, language skills, education and employment.

Sponsors are required to:

- ensure resettled family members receive their Biometric Residence Permits within 1 day of receiving them
- provide assistance with registering children with local schools as soon as possible – commencing prior to arrival and concluding registration no later than 2 weeks after arrival
- provide interpreting services, as required, for 12 months from arrival;
- arrange for English language tuition for adults as soon as possible and within one month of arrival
- provide formal English language tuition by a suitably qualified ESOL teacher, for a minimum of 8 hours per week for the first 12 months
- make provisions for formal English language tuition to be supplemented on a regular basis by less formal conversational English
- monitor progress of each individual and aim for at least one ESOL level of progress (in speaking and listening, reading, and writing) over the course of the year
- provide the opportunity to obtain an English language qualification at the appropriate level, where this will support access to employment and education
- support attendance at local Job Centre Plus sites for benefit assessments at the earliest opportunity
- assist with registration with a local GP, within one week of arrival;
- advise on accessing appropriate mental health services and specialist services for victims of torture as appropriate
- provide assistance with access to employment, including development of curriculum vitae, and education
- provide assistance with accessing digital services
- make aware of, and support attendance at, local community activities, within and without the sponsoring organisation, such as children's playgroups, coffee mornings, local clubs, local events, etc.

Annex E – DWP Refugee Group Leads – Contact Details

Region	Officer lead	Email
London and Essex	David Steeds	david.steeds@dwp.gov.uk
East	Bharat	bharat.keshwala@dwp.gov.uk
Midlands	Keshwala	
North Central	Jacqueline Williams	jacqueline.m.williams@dwp.gov.uk
North East	Kay Charlton	kay.charlton1@dwp.gov.uk
North West	Mariangela Hankinson	mariangela.hankinson@dwp.gsi.gov.uk
Scotland	Lorna Gilmour	lorna.gilmour1@dwp.gov.uk
South East	Sue Carey	suzanne.carey@dwp.gov.uk
	Denise Donovan	denise.donovan1@dwp.gov.uk
South West	Allison Cooper	allison.cooper@dwp.gov.uk
Wales	Wyn Morris	Wyn.morris@dwp.gov.uk
West Midlands	Pauline Jones	pauline.jones10@dwp.gov.uk

Annex F – Regional ESOL Coordinator – Contact Details

Region	Name	Email Address
East Midlands	Noel Oxford Maria Brambles Joshua Aspden Hannah Smith	noel.oxford@emcouncils.gov.uk maria.brambles@emcouncils.gov.uk joshua.aspden@emcouncils.gov.uk hannah.smith@emcouncils.gov.uk
East of England	Yasser Rezvani	Yasser.Rezvani@EELGA.GOV.UK
South East	Rachael Coker Alex Stevenson	rachaelcoker@secouncils.gov.uk alex.stevenson@learningandwork.or g.uk
London	Khadijah Amani	Khadijah.Amani@london.gov.uk
North East	Harriett Dee	Harriett Dee@middlesbrough.gov.uk
North West	Laura Mackey Mary Sharples (Lancashire County Council)	l.mackey@manchester.gov.uk mary.sharples@lancashire.gov.uk;
Northern Ireland	Ligia Parizzi	lparizzi@belfastmet.ac.uk
Scotland	Meg Robertson Gayle Findlay	meg@cosla.gov.uk; gayle@cosla.gov.uk;
South West	Bronwyn Prosser Jacky Lai	<u>bronwyn.prosser@swcouncils.gov.uk</u> <u>jacky.lai@swcouncils.gov.uk</u> ;
Wales	Erica Williams	erica.williams@wlga.gov.uk
West Midlands	Tahira Mohammad	tahira.mohammad@wolverhampton.gov.uk
Yorkshire & Humberside	Emma Taylor	Emma.Taylor@migrationyorkshire.org.uk