



association of **visitors** to
immigration detainees

Adults at Risk Safeguarding Policy

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1. Key Contacts

| | | |
|-------------------------------------|--|---|
| Designated Safeguarding Lead | enquiries@aviddetention.org.uk | Telephone: 07900196131/ 0207 281 0533 |
| Deputy Safeguarding Lead | enquiries@aviddetention.org.uk | Telephone: 0207 281 0533 |

2. Introduction and Scope of Policy

This policy:

- Applies to all staff, volunteers, trustees, consultants, people we support and any others who work on behalf of AVID in a paid or non-paid capacity.
- Provides guidance on preventing and identifying abuse and neglect, and recognising, responding, reporting and recording concerns.
- Is based on law and guidance that seeks to protect adults at risk as defined by the 2014 Care Act.
- Acknowledges that we may meet age disputed young people in detention, but that age-disputed young people will fall under the Safeguarding Children policy.

This policy should be read in conjunction with AVID's Safeguarding Policy Statement and Safeguarding Adults Escalation Guidance.

3. AVID's Values and Safeguarding Commitments: Policy Context

Our Safeguarding Policy is based on the legal framework in which we work, following the six key principles of Adult Safeguarding. However, we also recognise the unique environment that immigration detention brings and that this intersection with safeguarding must sit at the forefront of our approach when trying to ensure safety for the people that we support. Our safeguarding commitments and values reflect this and are outlined in our Safeguarding Policy Statement.

AVID strives to live our values, working to create a culture of safety through our approach and by working *with* people at risk who we support. We will only make decisions in isolation of the person where absolutely necessary (i.e. there is a significant, immediate risk of harm to self or others).

AVID aims to provide a safe, responsive, and supportive environment for our members. Our safeguarding responsibilities are guided by the principles underpinning all our work and specifically through:

- Believing that all people have a right to protection from harm, abuse and neglect.
- Respecting and being sensitive to difference, while acknowledging that the expression of difference must be restricted if its practices are harmful.

- Understanding that, as an organisation, we have a responsibility to protect adults at risk from harm when it is in our power to do so.
- Promoting the values of respect and partnership working unless to do so would place an adult at risk of harm.

We will ensure a trauma informed approach in the way we work. This will include:

- Ensuring a flexible, person-centred approach which promotes autonomy.
- Identifying the least intrusive option of support as per someone’s individual needs.
- Working from a strengths-based model that values the experiences, skills, knowledge and resilience of an individual. This does not involve ignoring the risks and challenges that may be present and unique to each situation but ensuring a focus on strengths rather than a ‘deficit approach’ in order to achieve positive outcomes in conjunction with the individual.
- Training and guidance to build understanding of the impact of trauma and how to work in a way that is trauma informed.
- Understand that many of the people we support will have had adverse, traumatic experiences and acknowledge the impact of these experiences in the way we work to actively avoid re-traumatisation, taking into account the risks that are present in pre- and post-detention environments.

4. Legal Framework

This policy is based on:

- The Care Act 2014 and the Care and Support statutory guidance
- The Human Rights Act 1998
- The Mental Capacity Act 2005
- The Adults at Risk Policy 2016

“Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.”

Care and Support Statutory Guidance, Department of Health

All adults should be able to live free from fear and harm. But some may find it hard to get the help and support they need to stop abuse. An adult may be unable to protect themselves from harm or exploitation due to many reasons, including their mental or physical incapacity, sensory loss or physical or learning disabilities. Within immigration detention, we may see specific safeguarding situations that don’t fit within the standard categories of abuse (see Appendix 2). For example, hunger-strike, pro-longed and sustained mental health concerns that are exacerbated by living conditions, or mental/physical health needs due to the unique environment of the detention centre and being outside of traditional safeguarding escalation routes.

AVID acknowledges that these unique set of challenges may create an additional barrier to adults at risk accessing support. We will seek to ensure that all people we support understand their right to safety and will seek to build trust and encourage open dialogue about their rights, care

needs, abuse or harm. We will seek to empower people through knowledge, support and recognition of lived experience.

4.1 The Care Act 2014

The Care Act 2014 sets out that adult safeguarding duties apply to any adult who:

- has care and support needs, and
- is experiencing, or is at risk of, abuse and neglect, and
- is unable to protect themselves from either the risk of, or the experience of, abuse and neglect.

However, the Care Act also clarifies circumstances that a safeguarding concern can be reported without consent even if the person has capacity. This includes:

- The alleged abuser is a member of staff.
- Other adults 'at risk' are in danger.
- There are children in the accommodation.
- A crime could be prevented.
- The risk is unreasonably high and meets the criteria for a MARAC (Multi-Agency Risk Assessment Conference). (Appendix 4).
- You suspect the person may be under duress or being coerced.
- A court order or other legal authority has requested the information (This requires authorisation from the Designated Safeguarding lead).

4.2 The Mental Capacity Act

The Mental Capacity Act 2005 is a key part of Adult Safeguarding legislation. AVID staff and volunteers need to have an awareness of this to ensure appropriate action is taken as and when needed.

The Mental Capacity Act 2005 (MCA) provides a framework to empower and protect people who have capacity impairments. It makes clear who can take decisions in which situations and how they should go about it. Not all adults who lack capacity are at risk of harm and not all persons at risk of harm lack capacity. There is a presumption in law that all adults are capable of making their own decisions. Some people, however, because of illness or injury, are unable to make decisions for themselves, or may be able to make some decisions but not others. Some may have temporary capacity impairments.

If AVID staff or volunteers have any doubt that an adult may lack capacity, then this needs to be escalated to the Safeguarding lead to discuss potential risks and if a referral to any services needs to be made. Under the Mental Capacity Act, there is an ongoing duty imposed on those assessing someone's mental capacity, and acting on their behalf, to encourage and maximise the ability for that person to make their own decisions. In the context of immigration, this requires access to a legal adviser who can advise fully and competently on the decisions that need to be made, while providing necessary reasonable adjustments.

Staff & volunteers should refer to Migrants Organise and NRPf Practice Guidance on Mental Capacity¹.

¹ [Supporting Migrants Lacking Mental Capacity in relation to immigration matters, Migrants Organise](#)

4.3 The Adults at Risk Policy

The Adults at Risk Policy 2016 sets out the safeguarding mechanism to determine if someone in detention is vulnerable and consequently whether they should be detained. The policy refers to ‘indicators of risk’, which are:

- suffering from a mental health condition or impairment
- having been a victim of torture
- having been a victim of sexual or gender-based violence, including female genital mutilation
- having been a victim of human trafficking or modern slavery
- suffering from post-traumatic stress disorder
- being pregnant
- suffering from a serious physical disability
- suffering from other serious physical health conditions or illnesses
- being aged 70 or over
- being transgender

This is a non-exhaustive list and other indicators that may render an individual vulnerable to harm in immigration detention should also be considered under the Adults at Risk Policy. Where this is the case or someone presents one of the above indicators, this should be reported to the Home Office by the medical healthcare team in the Immigration Removal Centre using Rule 35 Reports or using Rule 32 reports in Short-term holding facilities:

“Once an individual has been identified as being at risk, by virtue of them exhibiting an indicator of risk, consideration should be given to the level of evidence available in support, and the weight that should be afforded to the evidence, in order to assess the likely risk of harm to the individual if detained for the period for the specific statutory purpose of their detention to be carried out.”
(Extract from Adults at Risk in Immigration Detention, Home Office policy document, May 2024²)

5. **Organisational Arrangements and Practice**

5.1 Overview

In order to safeguard adults at risk AVID has:

- A clear line of accountability with a Designated Safeguarding Lead (DSL) to take leadership responsibility for the organisation’s safeguarding arrangements and a Deputy Safeguarding Lead who takes joint decisions with the Designated Safeguarding Lead on safeguarding concerns.
- A designated Safeguarding Trustee.
- Appropriate supervision and support for staff, including identifying any safeguarding training needs and gaps.
- Access to AVID’s Safeguarding Lead the Safeguarding Trustee or the Deputy Safeguarding Lead who will advise and promote good practice and will be available to staff at all times during working hours.
- Safeguarding training delivered annually to all staff and included as part of the induction.

² [Adults at risk in immigration detention](#)

- Staff are required to complete AVID’s Code of Conduct form confirming that they will comply with AVID’s safeguarding policies.
- Safeguarding leads receive more extensive training *at least* every two years.
- Training on trauma-informed support and vicarious trauma.
- Reporting guidance for member organisations.
- Guidance on digital safeguarding.
- Clear understanding of Charity Commission Safeguarding Serious Incident reporting procedures (see Appendix 5).
- An introductory message summarising the intent and content of this policy as well as a copy this policy integrated into our website.

5.2 Recruitment and training of staff and volunteers

All those responsible for employing and selecting staff and volunteers take every precaution to ensure sound and thorough vetting procedures. Care is always taken to ensure that references are taken up and obtained and that there is a focus on safeguarding throughout the recruitment process. Values based interviewing is used to enhance safer recruitment processes. Staff members who are required to visit detention centres are required to have an Enhanced DBS check, which is arranged by AVID. Staff members and volunteers who are working with vulnerable adults in the community, AVID will arrange a standard DBS check.

AVID will ensure that safeguarding experience & skill will be assessed at interview.

Staff, volunteers and trustees are provided with safeguarding training during their induction and provided with a comprehensive understanding of AVIDs policies, core values and commitment to safeguarding adults. All staff, volunteers and trustees should be equipped with knowledge and understanding around safeguarding adults and reporting procedures. All staff and volunteers should be clear about the core values of AVID and commitment to safeguarding adults. All staff members, trustees and volunteers are expected to read and sign AVID’s Safeguarding “Code of Conduct”.

AVID will ensure that all staff, trustees and volunteers receive annual awareness training on safeguarding adults.

AVID will develop and maintain a culture that promotes and prioritizes safeguarding by embedding safeguarding knowledge into line-management supervision.

5.3 Safeguarding as a Membership Organisation

We aim to provide a safe and supportive environment for our members and are committed to promoting the safety of those whom our members come into contact with. AVID recognise our responsibilities to report safeguarding concerns to the Charity Commission as part of our regulatory compliance. As a membership organisation we are aware that safeguarding concerns within our membership base may from time to time reflect on the name, profile & reputation of AVID.

How we work with Members:

- On joining AVID’s network, we ask members to share their safeguarding policy with us. Where members do not have a safeguarding policy, we support them to develop one and can provide a template policy.

- We provide bespoke safeguarding training to our members and/or support members to source safeguarding training to members and volunteers in our network.
- AVID is available to members to discuss safeguarding incidents and provide practical advice and guidance on escalating concerns.
- We encourage members to report high-level incidents (incidents that are being reported to the charity commission) which may carry a reputational impact to AVID. AVID will be available to support the member on navigating any duty to disclose the concern.

5.4 Digital Safeguarding

AVID primarily works remotely and most interactions amongst the staff team take place online. The use of online spaces – for training, events and virtual meetings – with our members, volunteer visitors, stakeholders and the wider public – has also increased. There are lots of benefits of interacting online but there are also unique risks presented by online forums. We also recognise that the same safeguarding risks may present in the online world and that it can often be harder to spot signs and indicators when working digitally.

At AVID, we provide a safe environment online and protect our staff, volunteers, trustees and people we interact with from online harm (see Appendix 3 for types of online harm) by:

- Ensuring personal information about all individuals who are involved in our organisation is held securely and shared only as appropriate (see AVID’s GDPR policy).
- Ensuring that images of people are used only after their written permission has been obtained, and only for the purpose for which consent has been given.
- Providing support, advice and training for staff and volunteers and others involved in leading our activities online about online safety.
- Have consultancy support from security experts to ensure device and cloud platform security.

For online meetings, forums, workshops and trainings with our members (closed groups) we:

- Actively set and communicate boundaries in digital spaces to make online experiences more positive, respectful and safe for those attending.
- Moderate the chat function.

For public events we:

- Ask people to register for public events and verify the identity of people.
- Enable waiting room so that we can verify people’s identity against registration, asking them to tell us who they are and their organisation if they have not registered and before letting them into the main room
- Moderate the chat function.
- Ensure screen sharing function is available to the host/trainer only.

We expect AVID staff, volunteers and trustees to follow the same safeguarding guidelines that apply offline, when they are interacting with adults at risk online.

We are also planning the following actions:

- To update our social media policy, recognising risks of trolling and sharing sensitive information.
- Creating community guidelines for our Google Group for AVID members.

6. Our approach to managing a safeguarding concern

This process is also set out in “AVID’s process for escalating a concern” in a flow diagram.

6.1 What is a safeguarding concern?

A safeguarding concern is any worry or concern about the safety or wellbeing of a person because of something seen or heard, or information which has been received. This includes any concerns about the behaviour of group members which is harmful or puts others at risk.

6.2 Framework

When approaching a safeguarding concern, we take the “4 Rs” approach:

| Action | Thought | Focus |
|------------------|--|--------------------------------|
| Recognise | What is going on? | Instinct/ Evidence/ Disclosure |
| Respond | What action should I take? | High/ Medium/Low risk |
| Report | Who do I need to tell? | External/ Internal |
| Record | Where should I log this and how quickly? | External/ Internal |

6.3 Initial actions

Staff members at AVID should approach potential safeguarding concerns with professional curiosity if they become concerned that an adult is at risk.

It is important that staff members share information early in order to provide an effective response and identify emerging concerns, remembering that initial information sharing does not always mean that action is necessary. Having raised a concern with AVIDs safeguarding lead, staff members should complete an initial risk assessment form, which can be found in Dropbox (alongside all of AVID safeguarding policies), and send this to the safeguarding lead. The form should include information on the date and time that the concern was identified, what happened, risk factors and protective factors.

Staff members should always obtain the authorisation of the Safeguarding Lead, or the Deputy Safeguarding Lead, to escalate a Safeguarding concern if the consent of the adult has not been obtained **unless** it is an emergency i.e. there is an immediate risk of significant harm.

6.4 Escalating a safeguarding concern

The Safeguarding Lead will decide whether a disclosure is made within 24 hours. Wherever possible this will be discussed with the Deputy Safeguarding Lead and the Designated Trustee for Safeguarding at AVID and decisions will be made collectively.

When deciding whether to refer or not, the Safeguarding team should consider:

- The adult's wishes and preferred outcome (refer to the above safeguarding principles and AVID's values).
- Whether their safety can be secured by following their wishes.
- The level and severity of risk.
- What the protective factors are.
- Whether the adult has mental capacity to make an informed decision about their own and others' safety. (AVID staff are not expected to assess capacity, just to flag any concerns around this.)
- The safety or wellbeing of children or other adults with care and support needs who are involved.
- Whether there is a person in a position of trust involved.
- Whether a crime has been committed.

If the decision is made to make a referral, then consent should be given. If the person at risk is in detention, the Safeguarding Lead should consider different referral pathways both within and outside of the detention settings, recognising the complexities of detention and considering what is known about the escalation routes within the relevant detention centre.

AVID will work with other agencies that have expertise in all safeguarding and adult safeguarding matters including the Local Authority and Local Authority Designated Officer (LADO) if necessary. Please see AVIDs Guidance on Escalating a Safeguarding Concern and Appendix 4 for referral pathways.

6.5 Consent, Confidentiality and Permitted Disclosures

The person we are concerned about will be involved in any decisions about referrals or professional help. This means discussing with them what they want to happen and informing them of their options.

AVID expects all employees, volunteers and trustees to maintain confidentiality in order to create a culture of safety. Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.

However, information must be shared if an adult is deemed to be at significant risk of harm (to self or others), if there is immediate danger/risk to life, or if a significant crime has been committed. If, in these instances, the person refuses permission to information being shared/onward referrals, disclosure is permitted and we will explain that we need share information/make a referral to make sure that they/those involved get the help they need. We will keep them informed of steps that are being taken and what to expect as a result.

6.6 When is a safeguarding concern closed?

When deciding whether to close the concern the Safeguarding Team will consider:

- Reports from the person involved on their wellbeing and safety.
- If the concerns have been addressed and there is no longer a need for support or protection, the concern can be closed.

- Any decision not to escalate, but rather to monitor the situation, means that the concern can be closed.
- What other support is in place from specialist organisations and statutory authorities.

6.7 Record Keeping

Well-kept records are essential where there are safeguarding concerns. Safeguarding concerns are logged, using the AVID Internal Safeguarding Reporting Form and saved in Dropbox under Safeguarding Concerns Log. A risk assessment and action log is kept updated by the safeguarding team using the Safeguarding Case Management Form.

There is an expectation of confidentiality in the recording, use and management of personal information. Trustees, staff and volunteers are clear about what information can be shared with relevant people within and outside of the organisation.

A report of safeguarding incidents and concerns is presented to the Board of Trustees on a quarterly basis.

6.8 Learning lessons

When a safeguarding concern is concluded, the Safeguarding Team will meet and take minutes to reflect on:

- How the safeguarding concern was handled
- What the impact was on the person involved
- Whether different steps could have been taken
- What they will do next time

This will be shared back with the trustees in the quarterly report and returned to with the team through safeguarding training.

7. Managing Risk when related to a staff member, trustee or volunteer

All staff, management, trustees and volunteers at AVID are expected to follow the safeguarding escalation procedure in AVIDs process for escalating concerns. If an allegation is against one of AVID's staff members, volunteers, trustees or Co-Directors, seek advice from the Designated Safeguarding Lead. If an allegation is against the Senior Safeguarding Lead, then the report should be made to the Safeguarding Trustee. Any staff who is suspected of not complying with the safeguarding Code of Conduct must be reported immediately to the designated Safeguarding Leads.

Failure to comply with the safeguarding policies or uphold the safeguarding commitments in the Code of Conduct may result in the following actions, depending on the severity of the breach:

- **Verbal Warning:** For minor or first-time breaches, the staff member may receive a verbal warning, with guidance on how to correct their actions.
- **Written Warning:** If the breach is more serious or repeated, the staff member will receive a written warning. This will outline the nature of the violation, expectations for future behaviour, and possible further actions if there is a recurrence.

- **Suspension:** In cases where the breach is significant, or there is an immediate concern for the safety of others, the staff member may be suspended from their duties while an investigation is ongoing. The Local Authority will decide on who will lead on a safeguarding inquiry should it progress to this stage. AVID should not conduct its own safeguarding inquiry unless instructed to do so by the Local Authority. The staff member will receive an immediate temporary suspension until the case can be closed.
- **Termination of Employment/Contract:** If the staff member is found to have seriously breached the safeguarding policies, especially in cases involving harm, abuse, or neglect, their employment or contract with AVID may be terminated. This decision will be made in line with AVID's disciplinary procedures, and in consultation with legal and safeguarding experts where necessary.

Please also see AVID's Whistleblowing Policy.

8. Links with other Policies

The safeguarding policy is supported by other organisational policies and procedures aimed at promoting safe and healthy working practices.

This document must be considered within the context of other policies at AVID, which relate to work with adults. Staff will be aware of how other issues can have a bearing on adults within different situations, including family situations.

9. Policy Review

The safeguarding policy, procedures, and guidelines are subject to regular review to ensure that they are fit for purpose. These reviews take place following every significant safeguarding incident and **at least** annually.

This policy reaffirms the responsibilities of the Co-Directors and the Board of Trustees to ensure that all adults who work for and on behalf of AVID are fully aware of the need to act continually to enhance the welfare and safety of people they come into contact with.

Appendix 1

Further Legislative Reading

- Care Act 2014
- Human Rights Act 1998
- Mental Capacity Act 2005
- Public Interest Disclosure Act 1998
- The Adults at Risk Policy 2016

Further Governance Information

- Charity Commission Guidance on Safeguarding Responding and Reporting

Further Safeguarding Sources of Support for Adults at Risk

- Ann Craft Trust Adult Safeguarding
- Social Care Institute of Excellence
- NCVO: Safeguarding Adults

Appendix 2

Safeguarding Adults: Types of Abuse

What are the types of safeguarding adults abuse?

The Care and Support statutory guidance sets out the 10 main types of abuse:

- Physical abuse
- Neglect
- Sexual abuse
- Psychological
- Financial abuse
- Discriminatory
- Organisational
- Domestic violence
- Modern Slavery
- Self-neglect

However, you should keep an open mind about what constitutes abuse or neglect as it can take many forms and the circumstances of the individual case should always be considered. For more information, read section 14.17 of the Care and Support Statutory Guidance.

What are the possible signs of abuse?

Abuse and neglect can be difficult to spot. You should be alert to the following possible signs of abuse and neglect:

- Depression, self-harm or suicide attempts
- Fear or anxiety
- The person looks dirty or is not dressed properly

- The person has an injury that is difficult to explain (such as bruises, finger marks, ‘non-accidental’ injury, neck, shoulders, chest and arms)
- The person has signs of a pressure ulcer
- The person is experiencing insomnia
- The person seems frightened of physical contact
- Inappropriate sexual awareness or sexually explicit behaviour
- The person is withdrawn, changes in behaviour

You should ask the person if you are unsure about their well-being as there may be other explanations to the above presentation.

Who abuses and neglects adults?

Abuse can happen anywhere, even in somebody’s own home. Most often abuse takes place by others who are in a position of trust and power. It can take place whether an adult lives alone or with others. Anyone can carry out abuse or neglect, including:

- partners
- other family members
- neighbours
- friends
- acquaintances
- local residents
- people who deliberately exploit adults they perceive as vulnerable to abuse
- paid staff or professionals
- volunteers and strangers
- staff members within Immigration Removal Centres, Short-Term Holding Facilities and other places of detention
- Other people in detention

Appendix 3

Online Harm, taken from Glitch Glossary, available at: [Glitch - Glossary](#)

- **Catfishing:** Creating a fake online persona to deceive others, often for the purpose of forming deceptive romantic relationships or engaging in other forms of fraud.
- **Cyberbullying:** Bullying or harassment that takes place over digital devices, often through social media, messaging apps, or online forums.
- **Cyberstalking:** Using the internet or other digital means to repeatedly harass or intimidate an individual, often with the intent of causing fear or distress.
- **Digital Blackface:** The phenomenon where non-Black individuals use Black cultural expressions, mannerisms, or language online, often in a performative or stereotypical manner, which can perpetuate harmful stereotypes and undermine Black voices and experiences.
- **Dis-information:** False information shared with intent to cause harm.
- **Doxxing:** Publishing private or identifying information about an individual online without their consent, often with malicious intent.

- Gaslighting: Manipulative behaviour aimed at making someone question their own perceptions, memory, or sanity, often by denying the reality of their experiences or feelings.
- Hate Speech: Speech that promotes hatred or violence against individuals or groups based on characteristics such as race, ethnicity, religion, gender, sexual orientation, or disability.
- Harassment: Persistent and unwanted behaviour that causes distress or discomfort to an individual, often including creepy messages, threats, insults, or intimidation.
- Impersonation: Pretending to be someone else online, often to deceive or defraud others, or to damage the reputation of the person being impersonated.
- Mal-information: True information shared with intent to cause harm.
- Mis-information: False information shared without intent of harm.
- Misogynoir: A term specific to the intersection of racism and sexism experienced by Black women, referring to the unique forms of discrimination and marginalisation they face online and offline.
- Online Abuse: Any form of harmful behaviour conducted through digital platforms, including harassment, cyberbullying, hate speech, and other forms of harmful content.
- Online Gender Based Violence: Any forms of online abuse, from harmful comments to inciting violence, which focuses on or makes reference to a person's actual or perceived sex or gender identity.
- Revenge Porn: Sharing sexually explicit images or videos of an individual without their consent, typically after a relationship has ended, as a form of revenge or harassment.
- Swatting: Making a false report to emergency services, such as claiming a hostage situation or violent crime is occurring at the victim's address, with the intent of prompting a heavily armed police response to the location.
- Trolling: Posting deliberately provocative or offensive messages online with the aim of eliciting strong emotional responses or disrupting conversation.

Appendix 4

Escalation within Immigration Detention

The Local Authority in which the Immigration Removal Centre is located continue to carry statutory duties to the people detained within them. The key legislation cited in the Safeguarding Adults & Children's policies will continue to apply and staff or volunteers escalating concerns should include both Home Office & Local Authority escalation routes.

Detention occurs within Home Office regulated Immigration Removal Centres, Short-Term Holding Facilities, Residential Holding Rooms, prisons and other confined environments. The principal statutory duties will reside with the Home Office as the

statutory agency responsible for the controlled environment and the welfare of those within it.

The following Safeguarding escalation routes apply for IRC's and RSTHF's:

| Centre | Safeguarding Contacts (welfare and safer custody) | Office number |
|---------------|--|--|
| Brook House | gw.welfare@serco.com safercommunitygatwick@serco.com | 01293 566 (ext. 531/532/603) |
| Tinsley House | th.welfare@serco.com safercommunitygatwick@serco.com | 01293 434880 |
| Heathrow IRCs | HIRC.Welfare@Mitie.com detheathrowdutymanagers@homeoffice.gov.uk | 0208 328 396 Colnbrook (ext. 1170274) 0208 569 166 Harmondsworth (ext. 1170522) Out of hours for Colnbrook, we have 1170333 or 1170303. Welfare CB Ext - 1170347, 1170220 and 1170328 HW Ext- 1170543, 1170166, 1170603 and 1170569 |
| Yarl's Wood | Yarls-Wood-welfare@serco.com | 01234 821415/6 01234 821196 |
| Derwentside | Teamwelfare@serco.com | 01207 260221 Ext 254 |
| Dungavel | Dungavel.welfare@mitiecc.com | 01698 395376 01698 395552 |

| | | |
|-------------------|--|---|
| | | 01698 395000 Ext 446 |
| Campsfield | campsfield.welfare@mitiecc.com/ | 01865 560900 |
| Residential STHFs | Manchester RSTHF- pennine.dcom@careandcustody-secure.co.uk Swinderby RSTHF- swinderby.rsthf@careandcustody-secure.co.uk Larne House RSTHF- larne.dcom@careandcustody-secure.co.uk | 0161 509 2015 01522 302665 02894 334346 |

Home Office Central Safeguarding Hub for those in the Asylum System:

AsylumSafeguarding@homeoffice.gov.uk

Appendix 5

MARAC Referral Criteria

(Taken from Safe Lives Referral Criteria Resources <https://safelives.org.uk/practice-support/resources-marac-meetings/resources-people-referring>)

There are four criteria for a referral to MARAC:

Visible High Risk

This is an assessment based on actuarial data, involving the use of risk indicators to assess the probability of serious harm or homicide. For domestic abuse cases, the number or ‘yes’ answers on the DASH usually determines the level of risk. SafeLives recommends that 14 ‘yes’ answers on the Dash should result in a referral to MARAC. However, completing the DASH is not a simple ‘tick box’ exercise and, even where there is a lower number of ticks, professional judgement should be used to inform the overall assessment of risk. In addition, professional judgement should not be used to ‘downgrade’ an actuarial risk assessment.

Professional Judgement

Professional judgement involves an assessment of dangerousness based on an individual practitioner’s consideration of a situation but will naturally use the information from the DASH checklist to inform this judgement. However, in addition to using the DASH it is crucial that professionals use their full range of knowledge to make an assessment; this knowledge will usually be gained through experience, reflection and deliberation. This form of assessment relies heavily on the skill and experience of the practitioner in order to make an informed decision of likely risk.

In domestic abuse settings, professional judgement will be informed by the practitioner’s knowledge of domestic abuse and its manifestations. Referrals to Marac can be made based solely on professional judgement. However, it is the practitioner’s responsibility to articulate what their concerns are and the reasons for the referral.

Potential Escalation

The potential for escalation can be assessed by looking at the frequency and/or severity of abuse.

It is common practice for services to determine there is a potential for serious harm or homicide when three domestic abuse events have been identified in a 12-month period. For example, three attendances at A&E, three police call outs or three calls to make housing repairs. This should alert professionals to the need to consider a referral to MARAC.

Repeat Referral

SafeLives defines a 'repeat' as any instance of abuse between the same victim and perpetrator(s), within 12 months of the last referral to MARAC. The individual act of abuse does not need to be 'criminal', violent or threatening but should be viewed within the context of a pattern of coercive and controlling behaviour.

Some events that might be considered a 'repeat' incident may include, but are not limited to:

- Unwanted direct or indirect contact from the perpetrator and/or their friends or family
- A breach of police or court bail conditions
- A breach of any civil court order between the victim and perpetrator
- Any dispute between the victim and perpetrator(s) including over child contact, property, divorce/ separation proceedings etc.

These events could be disclosed to any service or agency including, but not exclusive to, health care practitioners (including mental health), domestic abuse specialists, police, substance misuse services, housing providers etc.

Appendix 5

Charity Commission Serious Incident Reporting

(<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>)

The Charity Commission requires charities to report 'Serious Incidents'. If a serious incident takes place within AVID, it is important that there is prompt, full and frank disclosure to the Commission. A report needs to be made disclosing what happened, how it is being dealt with and if any other referrals have been made in connection with the incident.

What is a serious incident?

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work)
- loss of your charity's money or assets
- damage to your charity's property
- harm to your charity's work or reputation

For the purposes of this guidance, "significant" means significant in the context of your charity, taking account of its staff, operations, finances and/or reputation.

There are 6 main categories of reportable 'serious incidents'. Category 1 is the most relevant for the purpose of this policy:

1. **Protecting people and safeguarding incidents – incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the charity through its work**
2. financial crimes – fraud, theft, cyber-crime and money laundering
3. large donations from an unknown or unverifiable source, or suspicious financial activity using the charity's funds
4. other significant financial loss
5. links to terrorism or extremism, including 'proscribed' (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff
6. other significant incidents, such as – insolvency, forced withdrawal of banking services without an alternative, significant data breaches/losses or incidents involving partners that materially affect the charity

It is the responsibility of the charity trustees to decide whether an incident is significant and should be reported. The above weblink to the guidance provides further resources such as an 'Example Serious Incident Table' and considerations for Trustees around 'Serious Incident Decision-making'. NCVO also provide useful information on this topic at <https://www.ncvo.org.uk/help-and-guidance/safeguarding/specialist-guides/safeguarding-law/legal-duties-charities/report-issues/#/>.