MAYOR OF LONDON **LONDON** ASSEMBLY

Vulnerability and safeguarding

Photo showing a woman listening to a talk at a health summit

Key information

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Contents

Introduction

In this part of the toolkit, 'vulnerability' is used in a broad sense that may relate to any person seeking asylum. As used here, to be 'vulnerable' means a person may suffer short-term or long-term harms. Local authorities may be able to act in ways that will:

- reduce the likelihood that people will be harmed,
- reduce or mitigate the impact of any harms and
- strengthen protective factors so that people are more able to avoid harm for themselves now and in the future.

'Safeguarding' here refers to statutory duties to support and protect children and vulnerable adults. Local authorities have statutory safeguarding duties to children and vulnerable adults, as do Clearsprings Ready Homes and all organisations, which should also protect people seeking asylum.

The asylum support contracts safeguarding framework on the Gov.uk website (published 9 May 2022) states:

- "The safety and wellbeing of those we are accommodating is of paramount importance. Not every supported asylum seeker is vulnerable, however the experience of adjusting to life in the UK and settling into their new accommodation and support arrangements is often a period of time when vulnerabilities become most apparent. It is essential that sufficient safeguarding controls are in place to ensure that all adults, children, staff and stakeholder agencies are sufficiently protected throughout our processes."

Key lessons in this section

1. Ensure colleagues and partners in all agencies are aware of the vulnerabilities of people seeking asylum and adequately briefed on safeguarding.

2. Maintain regular multi-agency communication with Clearsprings Ready Homes and local responsible bodies to facilitate collaborative work.
3. Ensure staff take effective and timely action to reduce the likelihood and impact of harm, and know how to report and escalate safeguarding concerns.

1. Vulnerability of people seeking asylum

Any person can suffer harm from chronic pressures or shocks. People seeking asylum in the UK are often less able to avoid loss or harm, and more likely to be harmed, than if they were not currently within the asylum process.

Both individual factors and structural context contribute to people seeking asylum being more vulnerable to harm and having less agency to avoid harm than the population in general, such as:

- Ongoing impact of previous experiences and losses, from physical to financial before leaving their original country, or in transit, before arriving in the UK.
- Constraints on individuals and families once they have arrived in the UK:
  - Prolonged instability, uncertainty, insecurity of unknown duration, fear of being returned to their country where they face harm
  - Limited access to basic needs and lack of control over basic needs
  - Legal constraints and limits to entitlements and access, e.g. not work allowed, no choice in accommodation.
- Current pressures and demands on individuals and families:
  - health conditions
  - immigration processes
  - access struggles, not having effective access to entitlements.
- Lack of trust of authority reducing the likelihood of reaching out effectively for support, sharing in co-production exercises or calling authorities to account.
- Fewer resources:
  - Financial insecurity, no credit, no capital, minimal income so lack of transport, access to paid activities, trainings.
  - Few local contacts, less familiar with support systems.
- Poor communication with formal and informal bodies:
  - English language or literacy needs
  - some with inadequate or no digital access
  - limited knowledge of communication channels
  - limited access to channels for voice.

People seeking asylum may be vulnerable because they are often unable to:

- Prevent or avoid harm to themselves, their resources or their interests
- Resist people misusing or abusing their power
- Put sufficient pressure service providers to meet their responsibilities
- Build strategies to recover quickly from harm
- Build strategies to recover without longer term negative impacts (e.g. debt).

People seeking asylum are often highly resilient, but their context and constraints make them vulnerable to:

- Abuse from more powerful actors on whom they are dependent, such as trafficking, exploitation and domestic abuse
- Physical and/or mental ill health (see also our [Supporting changing needs](#) page)
- Loss of opportunities to thrive and reduction of longer-term options, which could include where there is indirect discrimination
  - Not having access to routes or channels that reflect diversity
  - Not being able to learn from the lived experiences of diverse people seeking asylum
- Losing individual agency (where a person's emotional, physical, financial or other resources drop to a level that reduces their ability to act effectively now and into the future)
- Adverse impact on the likelihood they will integrate socially, economically or politically later on:
  - Alienation, curtailed interaction and social relationships
  - Lost or underdeveloped skills, lack of progress in English language
  - Difficulties with economic integration
  - Difficulties with political and democratic integration, loss of voice and/or agency.

In contrast to **'adverse'** impacts, at this time of vulnerability, strong relationships and positive experiences can also have long term **'proverse'** benefits. 'Proverse' is a concept developed in the Design Lab as a desirable opposite to 'adverse'. 'Proverse' indicates the potential long term positive impact on people who have received excellent support at times of great vulnerability and crisis while in the asylum process. A proverse impact would be if a person – because of that experience of good support – goes on to develop a proactive and positive attitude to supporting others at a later stage, as part of becoming an integrated member of their new society.

Harm can be a caused to people seeking asylum through chronic, low-level difficulties and losses whilst in the asylum process, including ongoing difficulties with access or prolonged anxiety and stress. It can also be from a sudden event, crisis or 'shock' – e.g. a theft, violence, cessation of Home Office support on receiving a decision on their asylum claim.

There are protective factors that local authorities can support, as set out in the table below:

Table 1: Factors and actions by local authorities to reduce vulnerability

Protective factors to reduce vulnerability	Examples of actions by Design Lab participants to support resilience
Information and communication channels, including social media but also in person, digital connectivity	- Use of WhatsApp to share information and current opportunities with groups of people seeking asylum - Providing digital devices - Access to ESOL as a gateway to building wider social and support networks - Outreach schemes 'Help' guides

Protective factors to reduce vulnerability	Examples of actions by Design Lab participants to support resilience
Peer support, connections, social and economic networks, diverse social interaction	- Social activities for interaction - Champion programmes e.g. where people volunteer to share health messages through peer networks - Building individual's skills to advocate
Access to entitlements and effective support, 'people to help you', 'places to go', trust in services and willingness to engage with them	- Onsite staff and drop in events/lunches with support staff - Children Centres
Individual agency and self-determination; control of assets for action, money, freedom of movement, documents, broad experience of functioning in different contexts; confidence and belief in your own agency	- Access to library and IT - Responding effectively to individual interactions - English language groups and classes - Volunteering opportunities
Determination and goals, having a strong belief and values system, feeling a sense of belonging in different communities	- Volunteering opportunities - Connections with local VCS and faith networks

Vulnerability and Harm Risk Assessments are a useful way for a local authority to articulate concerns and prioritise actions is to assess where there is a risk of harm by scoring the **likelihood** and **potential impact** of harm in a particular context.

Most local authority teams are already familiar with forms of risk assessment in other contexts. Risk assessments are often linked to mitigating and preventative actions, including assurance processes for decision-makers. Local authorities can extend the use of risk assessments to this context without additional training.

The table below sets out an example risk assessment for vulnerability and harms, where the area of concern is the nutrition of babies at weaning stage in a hotel following complaints from residents:

Table 2: Example risk assessment for vulnerability and harms

	Likelihood of harm in this context (out of 5)	Potential impact of harm (immediate and longer-term) (out of 5)	Risk score (Likelihood x Impact)
Risk scores	3/5 (target 1/5)	4/5 (target 1/5)	12/25 (target 1/25)

	Likelihood of harm in this context (out of 5)	Potential impact of harm (immediate and longer-term) (out of 5)	Risk score (Likelihood x Impact)
Actions	- Partnership with hotel management - Regular on-site monitoring supply of weaning foods - Monitoring effectiveness of communication with parents	- Encourage family access to children's development centre where additional support is given - Health Visitors support access to supplementary supplies via baby bank	

2. Safeguarding

A safeguarding concern may relate to physical or health needs such as diabetes, pregnancy, disabilities or impaired mobility, learning difficulties, domestic abuse, mental ill health or other concerns.

Where there is a safeguarding concern for an individual the Home Office (Via information from Migrant Help) should take this into account in decisions affecting that individual (such as moving people between hotels, room sharing, additional facilities, providing for special nutritional needs, transport for appointments).

However, individuals who may be unwell or vulnerable are expected to inform the Home Office if they have any safeguarding needs when they arrival in the UK, or when claiming asylum and/or at their initial interview. If they have not, or if new needs arise, or they become more unwell, they are expected to inform reception staff in hotels, and will normally be required to provide evidence from medical or other professionals. Hotels may require evidence before making changes, e.g. requiring letters from GPs about nutritional needs.

Professionals who interact with at risk or potentially vulnerable people need to be live to the warning signs of risk, and not rely on the at-risk individual to disclose. All organisations have statutory safeguarding duties and local authorities, sometimes working closely with NHS colleagues and experts. The Asylum Safeguarding Hub is available in addition to established local authority routes.

2.1 Reporting safeguarding concerns

- Effective and timely safeguarding reporting and collaborative action between responsible bodies are essential to protect individuals and families seeking asylum. It is one of the protective factors that makes them less vulnerable to harm. All bodies have the legal responsibility to report safeguarding concerns to the local authority Multi-Agency Safeguarding Hub (MASH). It is required that each body has a Designated Person to see through the process.
- Although hotels, Migrant Help, Clearsprings Ready Homes (CRH) and the Home Office also have safeguarding channels and staff, this does not change the responsibility of all parties to report safeguarding concerns to the local authority. Where staff use internal channels it can cause a time lag before concerns reach the local authority. People in dispersed accommodation have a lower level of support and welfare checks generally than those in hotels, but the duty to safeguard remains.

- There have been concerns that hotel staff and other local bodies are not fully recognising or reporting safeguarding concerns. Although hotels are required to train staff, staff may not have previous experience of safeguarding, especially where they have started in 'retail' hospitality and have no previous experience in social or care sectors. Knowledge of the following may be lacking:
  - what might indicate there is a safeguarding issue,
  - what counts as a safeguarding issue,
  - how to report issues.
- Several boroughs find that having established regular collaboration and communication meetings fortnightly or monthly between local authorities, Clearsprings Ready Homes, NHS and hotel providers builds relations and communications, has helped to repeat and reinforce messages about reporting safeguarding. Such meetings help to develop and pursue actions to ensure hotel staff are well informed. Direct connections between named individuals in local authorities, CRH teams and hotel management, are used by boroughs where necessary for tackling specific issues, learning from cases or broader commitments to training etc.

Hounslow - Domestic Violence training

Hounslow has developed working relationships with hotel managers to build trust and offer safeguarding training and related topics including recognising indicators of domestic abuse. This has been well received by managers, who may have been concerned about reporting concerns. The training is intended to improve reliability and the scale of reporting by hotels, and at the same time develop working relationships.

Results:

- Hounslow is one three local authorities in London to have an in-house team dedicated to violence against women and girls and domestic violence. Staff supporting people seeking asylum worked closely with this team to build relationships with the Police and hotel staff.
- All the hotel staff engaged were keen to take part and many wanted more training on safeguarding and also domestic violence, mental health and preventing child exploitation.

Lessons:

- Involve a specialist local authority team to lead building relationships with Clearsprings Ready Homes,
- Build good relations so managers are open to training,
- Balance constructive engagement with criticism where necessary if providers were delivering services poorly.

Addressing safeguarding concerns relating to entitlements and conditions in hotels

At times safeguarding concerns relate to potential or actual harm where hotel residents are not able to access the full entitlements or quality of services that the providers are contracted to provide. Examples given have included nutrition, adjustments for people with special needs, equipment for babies and children, and over-crowding.

At times the concern relates to decisions made at levels above hotel management, for example Home Office allocations. There may be access or communication issues or different interpretations of contractual obligations.

- Boroughs often found direct relationships, built on growing familiarity, confidence and trust between local staff and hotel management were most effective for quick responses to immediate concerns.

- Multi-agency communication meetings are used to identify actions so hotels or other parties can improve access to necessary entitlements and reduce the risk of harm or safeguarding issues arising.

[Further details on the AASC Safeguarding Framework](#) are available on gov.uk.

Escalation and ensuring contract compliance

- Local authorities participating in the Design Lab found direct connections between named individuals in local authorities and CRH were often most effective in tackling safeguarding concerns rapidly where communication at hotel level had not brought the change needed.
- Where concerns persist, local authorities have used the same multi-agency meetings to pursue actions. Local authorities have found taking their own detailed minutes and following through effectively on actions using an action log or similar before and during each meeting have been effective.
- Local authorities have at times found it necessary to arrange joint visits in person involving different LA teams (including Environmental Health) and Home Office staff to visit hotels on site where there were different interpretations about, for example, room size and crowding.
- In addition to established routes:
    - Clearsprings Ready Homes Safeguarding team can be approached for concerns or wider questions and collaboration.
    - Home Office Safeguarding Hub can be contacted to escalate concerns specifically related to risks within the Home Office accommodation.

The table below sets out three examples of the fields local authorities have used in action planning frameworks in response to safeguarding concerns:

Table 3: Action planning frameworks in response to safeguarding concerns

'Partnership Response Plan'	'Local Health Partnership Response'	'Environmental Observations'
- Action - Team Lead - Timescale	- Issue Identified - Detail - Action - RAG (Red Amber Green) - Short /Medium /Long Term - Target date	- Who is making the observation? - What are you concerned about? - Why are you concerned? - What follow up actions have you taken or to be discussed?