



Prison Fellowship Safeguarding Policy and Procedure

1 Aim

- 1.1 Prison Fellowship contributes positively to building a strong and safe prison community and recognises the right of every individual Prisoner and their family to be protected from abuse. The aim of this Policy is to set out Prison Fellowship's commitment to safeguard and protect vulnerable people in our work and to provide a clear protocol and framework for safeguarding and discharging our duty of care towards vulnerable people.

This policy also aims to ensure that our staff, volunteers and partner organisations provide an appropriate and effective safeguarding response whenever a concern for a child, young person or adult's welfare and safety is raised or when an incident has been reported and to ensure that appropriate action is taken to protect and support anyone that is affected.

This policy and the associated safer working guide and vetting policy will also clarify the safeguarding parameters that we expect our partner organisations to observe as a prerequisite for collaborative work.

1.2 Our Commitment

Prison Fellowship recognises that a 'prison', 'young offenders' institution' and Secure Training Centre are 'specified places' in law and that any young person or adult held in any of these facilities is a vulnerable person in accordance with the 2006 Safeguarding Vulnerable Groups Act as amended by the 2012 Protection of Freedoms Act. Therefore, we will put the safety of vulnerable people first, and will encourage them to be confident and assertive in their relationship with us. We will develop a trusting and respectful relationship with them, and in doing so, provide them with a safe environment, so that they know they will be safe, listened to and supported. To ensure this happens, Prison Fellowship will:

- 1.2.1 Challenge unacceptable behaviour and address all reported suspicions or allegations of abuse perpetrated against vulnerable people.
- 1.2.2 Safely recruit all staff and volunteers who have contact with children and young people and vulnerable adults through the use of appropriate vetting procedures either directly or through other agencies.
- 1.2.3 Train all staff and volunteers with any responsibility for or contact with prisoners and their families in line with our safeguarding and safer recruitment principles and practice.
- 1.2.4 Ensure that any physical premises on which Prison Fellowship carries out its work meets all the standards required by the Health and Safety Executive and ensures the safety of prisoners and their families.
- 1.2.5 Respond without delay to every complaint or report suggesting that a person in prison or a member of their family may have been harmed, and co-operating with the relevant institution and authority in any investigation.

- 1.2.6 Offer first level support to any child or young person (and their parent, guardian or carer) or adult prisoner who informs us that they have suffered abuse in any form and signpost them to an appropriate source of support.
- 1.2.7 Challenge any abuse of power, by anyone in a position of trust in the course of carrying out any work with vulnerable people.
- 1.2.8 Follow up to date safeguarding legislation, guidance and recognised good practice and ensure that all relevant policies and procedures are regularly updated.

1.3 **Duty of Care**

We recognise that we have an obligation and duty of care to safeguard the children, young people and adults we work with and to co-operate with partner organisations in ensuring that effective safeguarding arrangements are in place to promote the safety of vulnerable people under their care and to respond to any concerns that may arise. To that effect, this policy and other supporting policies, procedures and guidelines will provide the framework to support our staff and volunteers in their safeguarding practices and the standards of care to be demonstrated in their work.

2. **Definitions**

The following are working definitions adopted by various bodies including the Disclosure and Barring Service (DBS), statutory bodies and safeguarding practitioners for the purposes of defining safeguarding in relation to children, young people and adults.

2.1 **Definition of 'person in prison'**

- 2.1.1 In this policy, a 'person in prison or custody' is any young person or adult who has been sentenced to imprisonment or is on remand in a prison or young offenders' institution or in a secure detention centre.

2.2 **What is safeguarding?**

- 2.2.1 Safeguarding includes everything an organisation must do to keep children, young people and vulnerable adults safe, including minimising the risk of harm and accidents and taking action to tackle safety concerns. Safeguarding is about embedding practices throughout the organisation to ensure the protection of children, young people and vulnerable adults wherever possible.

2.3 **Who is a child/young person?**

- 2.3.1 The Safeguarding Vulnerable Groups Act (2006) as amended by the Protection of Freedoms Act (2012) defines anyone under the age of 18 as a child or young person and anyone aged 18 and over as an adult. Note that the age of criminal responsibility in England and Wales is 10, therefore children between the ages of 10-17 can be arrested and charged with a crime and can be sentenced to imprisonment in a secure establishment.

2.4 **Who is a 'vulnerable' adult?**

- 2.4.1 Within the context of Prison Fellowship's work - a vulnerable adult is anyone aged 18 and over who is held in a Prison. This definition is based on the 2006 Safeguarding Vulnerable Groups Act as amended by the 2012 Protection of Freedoms Act, which defines a 'Prison' as a specified place in law for the purpose of carrying on '**regulated activity**' with vulnerable adults. The 2012 Protection of Freedoms Act further provides that certain defined '**care or welfare**' services must be provided to an adult in order for that individual to be considered a vulnerable

adult. Prison Fellowship staff must take both definitions into consideration for security vetting and other safeguarding purposes.

2.5 What is Regulated Activity?

- 2.5.1 For safeguarding purposes and in line with current legislation an activity involving 'unsupervised' contact with children and young people is considered to be '**regulated activity**'. Under the Safeguarding of Vulnerable Groups Act (2006) as amended by the Protection of Freedoms Act (2012) Regulated Activity with children is defined as frequent and unsupervised contact with a child or young person 4 or more days in a month or once a week and overnight.
- 2.5.2 An individual working unsupervised with children is considered to be engaged in Regulated Activity and must be appropriately vetted with the Disclosure and Barring Service for that purpose, in order to perform their duties (refer to paragraphs 4.6 and 4.7 of the Vetting and Safer Recruitment Procedure).
- 2.5.3 However, an individual working in a permanently supervised position will not be engaging in regulated activity but should still be appropriately vetted with the DBS or relevant vetting body in order to work with anyone under the age of 18. Note that in order for regulated activity to become non-regulated, a designated appropriately vetted supervisor must always be physically present in the same room as the staff/volunteer where the activity takes place.
- 2.5.4 Activities taking place in a 'specified place' such as a prison, Young offenders institute, secure detention centre, probation approved premises, school or hospital is considered to be regulated activity whether or not a designated supervisor is present, (see para 2.6 for definition of a specified place).

2.6 What is a 'Specified place'?

- 2.6.1 For the purpose of obtaining a criminal record disclosure check the Disclosure and Barring Service (DBS) defines a specified place as any premises where regulated activity with children, young people and vulnerable adults takes place on a frequent basis. This includes prisons, Young offender institutions, secure detention centres, probation approved premises, schools, OFSTED registered nurseries and crèches, hospitals and registered nursing care homes. Anyone working in a specified place will automatically be fully vetted whether or not their work in the facility involves direct contact with a vulnerable person or group.

2.7 What is abuse?

The following are the main categories and standard definitions adopted by statutory bodies and safeguarding practitioners for the purpose of identifying and addressing abuse.

- 2.7.1 Abuse is any kind of selfish act of oppression and harm, exploitation and manipulation of power by those in a position of authority over an individual or group of individuals. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. The Police, Crime, Sentencing and Courts Act 2022 expanded the list of roles which are legally considered to be positions of trust to include anyone who is in a teaching, coaching, instructing, training or supervising role within sport or religion. This means that since May 2022 if an adult of any age is in a role where they are working directly with young people aged 16 and 17 and forms a romantic or sexual relationship with them, they could be charged with criminal offences. If you have concerns about a relationship forming between a PF volunteer and a young person then you should notify the DPS.

2.7.2 Abuse can take a number of forms, and some common examples of abuse that employees and volunteers might encounter include:

<i>Type of Abuse</i>	<i>Additional Definitions</i>
<i>Financial</i>	The inappropriate use, misappropriation, embezzlement or theft of money, property or possessions.
<i>Spiritual</i>	The inappropriate use of religious belief or practice; coercion and control of one individual by another in a spiritual context; the abuse of trust by someone in a position of spiritual authority (e.g. minister). The person experiences spiritual abuse as a deeply emotional personal attack.
<i>Discrimination</i>	The inappropriate treatment of a person because of their age, gender, race, religion, cultural background, sexuality or disability.
<i>Institutional</i>	The mistreatment or abuse of a person by a regime or individuals within an institution. It can occur through repeated acts of poor or inadequate care and neglect, or poor professional practice or ill-treatment. The church as an institution is not exempt from perpetrating institutional abuse.
<i>Domestic Abuse</i>	<p>Domestic abuse is any threatening behaviour, violence or abuse between persons aged 16 or above who are or have been in a relationship, or between family members. It can affect anybody regardless of their age, gender, sexuality or social status.</p> <p>Domestic abuse can be physical, sexual or psychological, and whatever form it takes, it is rarely a one-off incident. Usually there is a pattern of abusive, coercive and controlling behaviour where an abuser seeks to exert power over their family member or partner. The Domestic Abuse Act 2021 identifies children who see, hear or experience the effects of domestic abuse as victims in their own right.</p>
<i>Online Abuse</i>	<p>The use of information technology (email, mobile phones, websites, social media, instant messaging, chatrooms, etc.) to repeatedly harm or harass other people in a deliberate manner.</p> <p>The online Safety Bill, 2021, introduces new rules for internet search engines and firms who host user-generated content, i.e. those which allow users to post their own content online or interact with each other. Those platforms which fail to comply with the rules could face penalties of up to 10% of their revenue, and in the most serious cases some may even be barred from operating.</p>
<i>Self-harm</i>	Self-Harm is the intentional damage or injury to a person's own body. It is used as a way of coping with or expressing overwhelming emotional distress. An individual may also be neglecting themselves, which can result in harm to themselves.
<i>Mate crime</i>	'Mate crime' is when people (particularly those with learning disabilities) are befriended by members of the community, who go on to exploit and take advantage of them.
<i>Cuckooing</i>	Cuckooing is the term used to describe occasions where the homes of adults at risk are taken over and used to distribute drugs or as a base for gang or criminal activities. The tenant may believe that the people who are in their home are their friends.

Modern Slavery	Modern slavery is the practice of treating people as property; it includes bonded labour, child labour, sex slavery and trafficking. In the UK we see examples of this through County Lines, Child Sexual Exploitation and forced labour.
Human Trafficking	Human trafficking is when people are bought and sold for financial gain and/or abuse. Men, women and children can be trafficked both within their own countries and over international borders. The traffickers will trick, coerce, lure or force these vulnerable individuals into sexual exploitation, forced labour, street crime, domestic servitude or even the sale of organs and human sacrifice.
Radicalisation	The radicalisation of individuals is the process by which people come to support any form of extremism and, in some cases, join terrorist groups. Some individuals are more vulnerable to the risk of being groomed into terrorism than others.
Honour / Forced Marriage	An honour marriage / forced marriage is when one or both spouses do not, or cannot, consent to the marriage. There may be physical, psychological, financial, sexual and emotional pressure exerted in order to make the marriage go ahead. The motivation may include the desire to control unwanted behaviour or sexuality.
Female Genital Mutilation	Female genital mutilation (FGM) comprises all procedures involving partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons as defined by the World Health Organisation (WHO). FGM is a cultural practice common around the world and is largely performed on girls aged between 10 and 18. Performing acts of FGM is illegal in the UK as is arranging for a child to travel abroad for FGM to be carried out.
Peer-on-Peer Abuse	Peer-on-Peer abuse is where sexual abuse takes place between children of a similar age or stage of development.
Child on Child Abuse	Child on Child abuse is when a child abuses another child of any age or stage of development.
Historic Abuse	Historic abuse is the term used to describe disclosures of abuse that were perpetrated in the past. Many people who have experienced abuse don't tell anyone what happened until years later, with around one third of people abused in childhood waiting until adulthood before they share their experience.

2.8 What is 'Relevant conduct'?

Prison Fellowship accepts the following definitions of relevant conduct under Schedule 3 of the Safeguarding of Vulnerable Groups Act 2006 in relation to the barring of those who pose a risk of harm to children. A relevant conduct is a conduct which must be referred to the DBS and which could lead to a barring decision. It includes any:

- conduct which endangers a child or is likely to endanger a child (i.e. anyone aged 0-17)
- conduct which if repeated against or in relation to a child would endanger that child
- conduct involving sexual material relating to children (including possession or sighting of such material)
- conduct involving sexually explicit images depicting violence against human beings
- conduct of a sexual nature involving a child

2.9 Pastoral Support

Following an allegation / suspicion, a period of investigation will follow, which will be stressful for all involved. PF will aim that one person is responsible for dealing with the authorities, another offers support to the victim/s and their family, and another gives pastoral care to the alleged perpetrator, without compromising the alleged victims or their families. It may be

necessary to appoint other people to support the families involved. Where a statutory investigation is under way, this support will be provided with the knowledge of the statutory authority involved. Where the perpetrator accepts some responsibility, they will be encouraged to seek specialised interventions/treatment to reduce the risk of re-offending. This may only be appropriate once the investigation and legal processes have been completed.

3. Safeguarding Responsibilities

3.1 All PF employees and volunteers must follow guidance laid out in this policy and other associated policies and procedures and should report any safeguarding concerns using the procedure set out in paragraph 8. We expect our staff and volunteers to be excellent role models and to contribute to developing safe working practices. The following positions within Prison Fellowship's staff body and Board of Trustees have been identified as having specific safeguarding responsibilities within the organisation and in its work with external partners.

3.2 **Board of Trustees and CEO** - Prison Fellowship's Board of Trustees have overall responsibility for ensuring effective safeguarding throughout the organisation. This responsibility will be delegated to a responsible Trustee who will work with the CEO to monitor and report any safeguarding concerns or incidents to the Board. To that effect, the Board and CEO will:

3.2.1 Approve and monitor this and all other relevant policies and procedures and standards to ensure Prison Fellowship fulfils its duty of care towards vulnerable people.

3.2.2 Ensure that sufficient resources are allocated to enable the effective implementation of this policy.

3.2.3 Ensure that any safeguarding concerns raised have been appropriately addressed and that the welfare of vulnerable people are ultimately safeguarded.

3.2.4 Ensure that Prison Fellowship's integrity is maintained at all times and its reputation, as an organisation which takes safeguarding very seriously, is protected.

3.2.5 Approve changes to this policy and any associated policies, procedures and reports.

3.2.6 Constitute a panel (through the CEO) to hear appeals challenging an existing decision made by PF which the victim or perpetrator deems to be unsatisfactory or unfair.

3.3 **Designated Safeguarding Person** – the Board on advice of the Chief Executive will approve the appointment of a Designated Safeguarding Person (DSP). The DSP can either be an existing member of the Senior Management team or anyone appointed solely for the purpose of the role. The DSP will be responsible for implementing and monitoring this policy and for reporting to the Chief Executive, Safeguarding Trustee and the Board. The DSP will:

3.3.1 Ensure that all aspects of this policy are implemented across Prison Fellowship's work.

3.3.2 Liaise with HR administrator and the Safeguarding Administrator to ensure that employees and volunteers with safeguarding responsibilities are appropriately vetted in line with this policy prior to taking up a role with Prison Fellowship, and ensure that relevant employees and volunteers are re-vetted every 3-5 years as deemed appropriate to a role (See Vetting policy document).

- 3.3.3 Ensure that all employees receive an appropriate level of safeguarding information and training that is commensurate to their duties.
- 3.3.4 Liaise with PF's partners and external agencies including the Prisons Service, Disclosure and Barring Service (DBS), the Police and any other relevant statutory body when a safeguarding concern or incident is reported to PF.
- 3.3.5 Ensure that any safeguarding concerns raised between Prison Fellowship and its partner organisations are addressed and satisfactorily resolved.
- 3.3.6 Ensure that all vetting disclosures have been viewed and that blemished disclosures are appropriately risk assessed prior to an employee or volunteer assuming safeguarding responsibilities.
- 3.3.7 Receive and respond to all safeguarding reports and ensure they are fully investigated and resolved in accordance with Prison Fellowship procedures.
- 3.3.8 Ensure that there is an appropriate safeguarding monitoring and reporting procedure in place and that all employees and volunteers are aware of it.
- 3.3.9 Ensure that there are safeguarding parameters and standards in place for any activity, project, programme, contract or event involving Prison Fellowship and a third-party organisation or individual.
- 3.3.10 Ensure that PF projects have appropriate safeguarding standards for activities carried out with third party organisations or individuals. This will include any activity with prisoners and their families in any PF region.

3.4 **Safeguarding Administrator** – this role will be responsible for implementing, co-ordinating and monitoring safeguarding activities within a Prison Fellowship project, programme, event or activity. The role can be performed by any member of staff who has been delegated by senior management for that purpose and who has the necessary level of knowledge and experience to effectively perform the role. The safeguarding administrator will be responsible for:

- 3.4.1 Implementing this safeguarding policy and other associated policies, procedures and guidance aimed at safeguarding the wellbeing of vulnerable groups involved in any PF activity or project.
- 3.4.2 Developing and implementing specific safeguarding measures as part of an activity or project in order to ensure the safety of vulnerable people present during the activity. This will include ensuring that any premises on which a Prison Fellowship activity takes place (with children and young people) is safe and secure and that all relevant PF staff and volunteers are appropriately vetted and understand their safeguarding responsibilities.
- 3.4.3 Ensuring that any partner organisation involved in hosting or running an activity involving Prison Fellowship maintains a rigorous level of safeguarding to the standard expected by Prison Fellowship.
- 3.4.4 Ensuring that any member of staff or volunteer working unsupervised in a 'regulated activity' has been fully vetted and cleared prior to taking up the role.

3.4.5 Ensuring that staff and volunteers working in non-regulated activity with children and young people are fully and permanently supervised (at all times) while carrying out the role. Note that if the role at any point involves **unsupervised and frequent contact** with children then it would be considered to be **'regulated activity'** and the Safeguarding Administrator will need to ensure that the staff member or volunteer has been appropriately vetted otherwise the activity will be deemed illegal under the Safeguarding Vulnerable Groups Act (2016) as amended by the 2012 Protection of Freedoms Act. **The term 'fully supervised' can be defined as 'Activity where the supervisor – who has him/herself been safely recruited - is always able to see the supervised worker's actions during his/her work'.**

3.5 **Other employees and volunteers** - All employees and volunteers of Prison Fellowship having substantial contact with vulnerable people (including prisoners and their families) through their work have a duty of care. For the purpose of this policy, a volunteer is anyone offering his/her services in an unpaid capacity.

3.6 **Partner organisations** - In instances where an employee or volunteer is recruited by another organisation to work in partnership with Prison Fellowship, it is the responsibility of the recruiting organisation to ensure that the volunteer is safely recruited and vetted should the role/project involve substantial contact with prisoners and their families. Prison Fellowship will ensure that any organisation it collaborates with has robust safeguarding and safer recruitment policies and procedures in place, and that relevant staff and volunteers have been safely recruited to work in their respective roles. Partner organisations must also ensure that relevant staff and volunteers fully understand their duty of care towards prisoners and their families and are familiar with the safeguarding policy of the organisation they work for.

4. Prison Fellowship projects

4.1 Prison Fellowship recognises that there are different contexts in which its employees and volunteers come into contact with prisoners and their families, therefore this policy will provide a generic **Safer Working Guide** which can be adapted to the requirements of individual PF projects and activities. Contact with vulnerable people will depend on the remit of the individual project as it may be impossible to foretell the specific nature of contact that employees or volunteers might have with vulnerable people until a project or activity has been risk assessed.

4.2 Where Prison Fellowship works with vulnerable groups outside a prison environment e.g. in projects involving the families of prisoners and their children, PF will ensure that employees and volunteers involved in such activities receive an appropriate level of vetting prior to their involvement. PF will adopt the 2012 Protection of Freedoms Act's definition of 'regulated activity' with children for the purpose of DBS vetting such volunteers and employees. The Act defines regulated activity as:

4.2.1 Supervision, training, listening, guidance, play or care to children and young people.

4.2.2 Activities for children and young people taking place in a specified place such as a school, prison, registered crèche, hospital or registered day care centre.

4.2.3 Any other activity for children or young people that takes place once a week and overnight or at least 4 times in a month.

4.2.4 Note that it is illegal for Prison Fellowship to ask to see an individual's criminal record disclosure where the role does not involve work with vulnerable people and does not meet the Disclosure and Barring Service's eligibility criteria for an enhanced DBS check.

4.3 Examples of current PF projects that may involve regulated and non-regulated work with children and young people and will require a DBS enhanced check

- **Angel Tree** - local Prison Fellowship volunteers work with churches and prison chaplains to buy, wrap and deliver the Christmas presents to children with a parent in Prison. Each gift is dispatched as though it is from the parent in Prison and is accompanied by a personal message written by the parent for their child. Some volunteers and staff may have occasional direct contact with children at annual 'family day' events organised by PF.
- **Sycamore Tree** – a victim awareness programme that teaches the principles of restorative justice. It is taught in prisons to groups of up to 20 learners by Prison Fellowship volunteers. Prisoners on the programme explore the effects of crime on victims, offenders and the community, and discuss what it would mean to take responsibility for their personal actions.
- **Prayer Line** - a service that allows anyone in prison to call a free number and leave a confidential message with his or her personal prayer request.
- **Pastoral Care** – trained PF volunteers offering pastoral and bereavement support to those in prison under the supervision of the chaplaincy department.

5. Implementation

5.1 The scope of this safeguarding policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation aimed at embedding a culture of good safeguarding practice. These policies and procedures include the following:

- 5.1.1 **Safer Working Guide** – this aims to raise awareness among staff and volunteers of their duty of care towards vulnerable people by ensuring that they have a practical understanding of what constitutes illegal, unsafe and unwise behaviour when working with children, young people or vulnerable adults. It provides general principles of safe working practices and aims to assist staff and volunteers with monitoring their own safeguarding standards and practice as well as serving as a reference point for staff and volunteers new to working with vulnerable people.
- 5.1.2 **PF Vetting Policy** – will help Prison Fellowship ensure that all persons recruited to work with vulnerable people are safely vetted, trustworthy and reliable and are not subject to any offences which may put the wellbeing of children, young people or vulnerable adults at risk.
- 5.1.3 **The Recruitment of Ex-Offenders Policy** – will ensure that Prison Fellowship treats DBS applicants who have a criminal record fairly and not discriminate automatically because of a conviction or other information revealed on their disclosure certificate. It allows Prison Fellowship to ask the 'Excepted Question' of an applicant who has spent or unspent convictions insofar as they have applied to work with children, young people or vulnerable adults.
- 5.1.4 **Whistle blowing Policy** – this enables staff to inform on other staff/volunteer practices within the organisation where there are suspected safeguarding concerns
- 5.1.5 **Grievance and disciplinary procedures** – to address breaches of policies, procedures and protocols, including a failure to protect the welfare/safety of a child or young person involved in the work of Prison Fellowship.

- 5.1.6 **Health and safety policy** – to protect the safety and wellbeing of children and young people, staff and volunteers and other parties involved in any activity carried out on premises owned or hired by Prison Fellowship or its partners.
- 5.1.7 **Equal Opportunities** – ensures that safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory.
- 5.1.8 **Data Protection Policy** – ensures that confidential data is stored and accessed securely and disposed of appropriately.

6. Induction, Training and support for staff

- 6.1 Prison Fellowship is committed to providing staff and volunteers with an appropriate level of safeguarding training as part of their induction programme and on an ongoing basis as required.
- 6.2 During induction new employees and volunteers will be expected to:
 - 6.2.1 Familiarise themselves with this policy document, the safe working practice guidance, DBS vetting and safer recruitment procedure, 'Recruitment of ex-offenders' policy, Lone Working practice and Health and Safety policy.
 - 6.2.2 Understand the safeguarding reporting processes and lines of responsibility associated with their role and project
 - 6.2.3 Undertake initial training on safeguarding and child and vulnerable adult protection as relevant and provided.

7. Maintaining professional boundaries

- 7.1 PF employees and volunteers will maintain professional boundaries at all times when working with vulnerable people. Professional boundaries define the limits between a worker and a client and include a set of standards necessary for a close working relationship to exist while ensuring that an appropriate level of detachment is kept in place between both parties.
- 7.2 **Section 4 of PF's Safer Working Guide** provides guidance on professional conduct that should be followed by staff and volunteers when working with children, young people or in contact with vulnerable adults. A breach of professional boundaries or conduct by a Prison Fellowship employee or volunteer could result in disciplinary measures being taken against them.

8. Reporting and resolving safeguarding complaints, allegations and incidents

- 8.1 Prison Fellowship will investigate and resolve any safeguarding concerns or allegations made against its staff or volunteers or where a report has been made to PF about a prisoner's welfare. We will follow the steps below to ensure that any safeguarding concern, allegation or incident is appropriately reported, investigated and resolved.
- 8.2 The written record should be linked to the 4 R's: RECOGNISE, RESPOND, RECORD and REPORT.
 - 1. **Recognise** that abuse may be taking place
 - 2. **Respond** to the concern
 - 3. **Record** all the information they have received
 - 4. **Report** the concern to the DPS who may, in turn, report it to the statutory authorities.

This must be made as soon as possible after the event; be legible; include the name, date of birth and address of the child or adult at risk; include the nature of any concerns and description

of any injuries; include an exact record of what the child or adult at risk has said, using their own words where possible; include any action taken; be signed and dated; be kept secure and confidential (available only to the DPS and others responsible for safeguarding).

- 8.2.1 **Step 1** - Any member of staff or volunteer can report and discuss a safeguarding concern or incident with their immediate supervisor either verbally or by email. A written record will be completed by the supervisor using PF's Safeguarding Report form and sent to PF's Designated Safeguarding Person (DSP) for investigation.
- 8.2.2 **Step 2(a)** - if the allegation concerns a member of staff or volunteer, the member of staff or volunteer should be asked to temporarily step down from their role with immediate effect until an investigation of the case has been completed.
- 8.2.3 **Step 2(b)** - If the concern was reported to a PF member of staff or volunteer by a vulnerable person, the DSP will investigate the report and inform all relevant external agencies of the incident. The case will then be closed provided it does not involve a PF staff or volunteer or a PF activity or project. The DSP should record the outcome of the investigation and report this to PF's senior management team and Board of Trustees as appropriate.
- 8.2.4 **Step 3** – Where appropriate and as part of an investigation, the DSP should contact relevant statutory bodies in the area where the incident occurred for advice and to report the matter. In most cases, this will be the appropriate prison authority, local authority and/or local police force. Contact can be made through a Local Authority Designated Officer (LADO) in a local authority's Safeguarding Department, if the incident involves a child or young person.
- 8.2.5 **Step 4** - Depending on the nature of the incident or concern reported, the DSP may report the incident to the responsible local Police force in the first instance, particularly if the incident or concern involves physical or sexual abuse; this is to ensure that the victim is protected from further harm.
- 8.2.6 **Step 5** – The DSP should follow any professional or legal advice or suggested good practice provided by relevant agencies while investigating the matter.
- 8.2.7 **Step 6** - Should the allegation be confirmed as a genuine safeguarding incident involving a PF staff member or volunteer, the DSP should follow PF's disciplinary procedure in dealing with the member of staff or volunteer concerned. This may ultimately require the staff member or volunteer to be dismissed from the role should they be found liable for the incident.
- 8.2.8 **Step 7** – if there has been a genuine safeguarding incident and the perpetrator has been dismissed from their role at PF, the incident and the perpetrator must be referred to the Disclosure and Barring Service by Prison Fellowship's DSP. Information about the referral process and a referral form can be obtained from the DBS' website: <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>
The perpetrator may be placed on the DBS' Child or Adult Barred lists depending on the outcome of the DBS's review of the case based on the information provided by PF.
- 8.2.9 **Step 8** – Being placed on the DBS' Child or Adult Barred list does not preclude PF from employing an individual, it just means that the individual is barred from working with either children or vulnerable adults. However, they may be employed or volunteer in any other capacity for PF as long as it does not involve working with either or both vulnerable groups.

PF will risk assess a barred person before appointing them to any other role within PF and will give due consideration to the requirements of its Rehabilitation of Offenders' policy.

8.2.10 **Step 9** – In fulfilment of the Charity Commission's good governance objectives, all safeguarding incidents and reports must be recorded and reported to PF's Board of Trustees and ultimately to the Charity Commission. It should be noted that Prison Fellowship is a 'children's charity' under the provisions of Safeguarding of Vulnerable Groups Act 2006 which recognises any charity providing a service to children and young people as a 'children's charity' in law, whether or not it is their sole charitable objective.

8.2.11 **Step 10 – Appeals** - should either the victim or the alleged perpetrator be unhappy with PF's resolution of a safeguarding complaint, they may write to the Chief Executive to appeal/review the decision. This should be done within five working days of receiving the original decision. An 'appeals panel' should be constituted by the Chief Executive within thirty working days of receiving the letter of appeal. The appeal panel's decision should be recorded using the Incident resolution form and communicated to the relevant parties within 5 working days of the decision. Note that an appeal can be lodged directly with the Chair of the Board of Trustees should the Chief Executive be the subject of a complaint. The Chair should follow the same appeals procedure as described in Step 10.

9. Information sharing

9.1 All employees and volunteers have a professional duty to share information with other agencies in order to safeguard children, young people and vulnerable adults. PF recognises that there may be occasions when the need to safeguard effectively may override confidentiality and necessitate the sharing of confidential information. In such circumstances information may be shared on a need to know basis only and with the approval of Prison Fellowship's DSP and senior management team. Refer to the para 4.2 of the Safer Working Guide on confidentiality and information sharing.

9.2 PF also has a legal duty to refer an employee or volunteer who poses a risk of harm to children or vulnerable adults to the DBS, failure to do so can result in a fine and/or up to 5 years imprisonment. There must be sufficient and solid evidence that the employee or volunteer poses a risk of harm before they can be referred to the DBS. The DBS will not consider evidence based on rumour or unsubstantiated reports. PF will also inform the police and other relevant authorities if it believes a relevant conduct has occurred (see para 2.8).

10. Monitoring

10.1 Prison Fellowship will endeavour to monitor safeguarding good practice throughout its work.

To that effect the following key safeguarding activities will be monitored:

- a. Safer recruitment and vetting checks undertaken
- b. Records made and kept of supervision sessions
- c. Safeguarding training undertaken by employees and volunteers
- d. Safeguarding reports and complaints and action taken
- e. Currency of all relevant policies and procedures
- f. Current relevance of safeguarding incident reporting structure
- g. Presence and action of Designated senior manager responsible for Safeguarding is in post

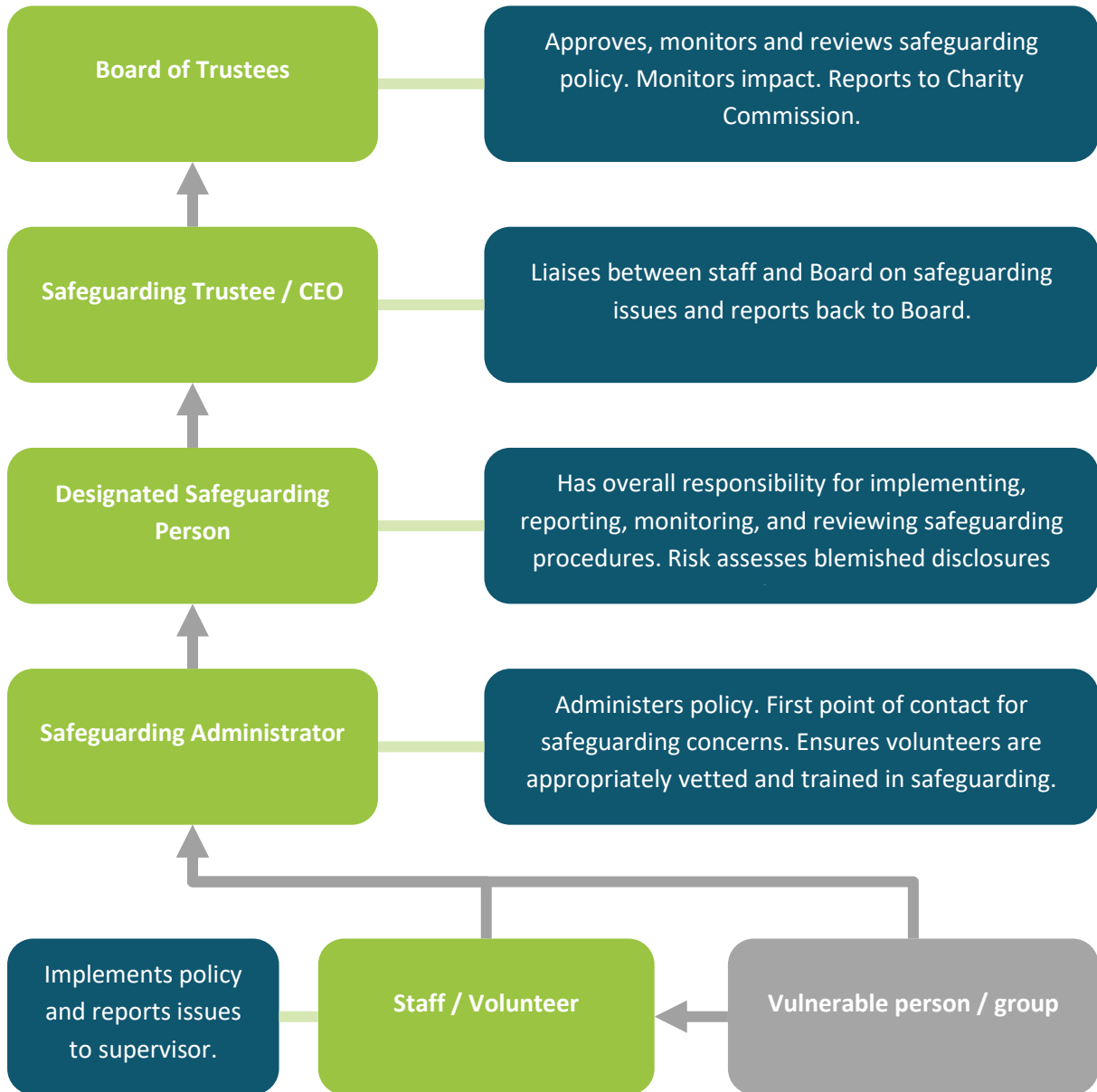
11. Reviewing Policy

11.1 This policy will be reviewed every 24 months by the Chief Executive and DSP and reported to the Board of Trustees.

Notes:

- The non-statutory timescales set out in the policy should be adhered to as closely as possible having regard for personal circumstances and other serious factors.
- Vetting processes set out in the policy will often be carried out by HMPPS as the responsible authority for PF staff and volunteers visiting vulnerable people in prisons.

Appendix 1 - Safeguarding management & incident reporting flowchart



Policy Issued by: Peter Holloway, Chief Executive (2018)
Policy Reviewed by: Stephen Hawkins (2024)
Version 1.4