



1. Introduction and context

- a. This guide is for all employees and volunteers of Prison Fellowship, particularly those who work in close contact with vulnerable groups such as children, young people and vulnerable adults, and sits alongside our Code of Conduct (See section 4). Prison Fellowship works with young and adult prisoners who are considered vulnerable by law and with their families, which may include children and young people. Our employees and volunteers must therefore act professionally at all times in order to provide a safe and supportive environment that secures the well-being and best outcomes for vulnerable people.
- b. *The guide aims to ensure that PF's employees and volunteers fully understand their duty of care towards vulnerable people by making them aware of illegal, unsafe and unwise behaviour that should be avoided. It will also assist employees and volunteers to monitor their own safeguarding standards and practice and also serve as a reference point for those new to working with vulnerable people. This guide will also support any collaborative work Prison Fellowship undertakes with its partners.*
- c. It is important to create a safe and secure environment for vulnerable groups, however, this is not always as straightforward as we think; much will depend on how PF's employees and volunteers interact with those they encounter in the course of their work, particularly in situations where tensions and misunderstanding can occur. It is in the course of interaction that individual behaviours can cause allegations to be made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned. Thus, we aim to give a clear message that unlawful or unsafe behaviour will not be tolerated and that where appropriate, legal or disciplinary action may be taken (amongst other measures) to address incidents when they occur.
- d. This guide may not cover all eventualities, as there may be occasions and circumstances in which PF staff or the Board of Trustees may have to make decisions or take action in the best interests of a vulnerable person or group, which may appear to contravene this guide or where no guidance exists. On such occasions, we expect our workers or trustees to make professional judgements in order to secure the best interests and welfare of the vulnerable person or group in their charge and ensure that any decisions taken are reasonable. Such independent professional judgement, if exercised, should immediately be reported and cleared with Prison Fellowship's Designated Safeguarding Person (DSP) and Chief Executive.
- e. Finally, this guide should be read in conjunction with Prison Fellowship's Safeguarding and Vetting policies and consideration should be given to the provisions of the Recruitment of

Ex-Offenders policy and any other policies, procedures and protocols that are relevant to any given situation.

2. Definitions

The definitions below should be read in conjunction with the definitions provided in Section 2 of the Safeguarding Policy document.

- a. **The term 'vulnerable people'** is used to refer to children, young people and vulnerable adults. In the context of Prison Fellowship's work, a vulnerable person is anyone whether child, young person or vulnerable adult held in prison custody in the UK and any child or young person who is a member of a prisoner's family.
- b. **Prison and Prisoner** - Prison Fellowship specifically adopts the definition given in the 2006 Safeguarding of Vulnerable Groups Act as amended by the 2012 Protection of Freedoms Act which defines a 'Prison' as a specified place in law and prisoners as vulnerable people for safeguarding purposes.
- c. **A child or young person** is anyone under the age of 18.
- d. **Vulnerable adult** - Note that for the purpose of obtaining Disclosure and Barring Service (DBS) criminal records checks under the Safeguarding Vulnerable Groups Act (2006) as amended by the Protection of Freedoms Act (2012) a **vulnerable adult** is defined as anyone aged 18 and above who is in receipt of any of the following services from a service provider:
 - **Personal care**
 - **Health care**
 - **Social work support**
 - **Assistance with conducting own affairs**
 - **Conveyance (due to age, illness or disability) to or from a place providing care or support**
 - **Assistance with paying bills or shopping**
- e. **'Staff' and 'volunteer'** - refers to a paid employee and volunteer (unpaid) engaged by Prison Fellowship to work on a project, programme, event or activity organised solely by Prison Fellowship or in conjunction with a partner organisation, individual or group.
- f. **Allegation** means any information that suggests that a person has caused or may cause hurt or harm to a child, young person or vulnerable adult
- g. **Hurt and harm** refers to any of the categories of abuse defined in Prison Fellowship's Safeguarding Policy document.

- h. The above definitions and this guidance (as a whole) also applies to projects and activities organised by other organisations which engage staff or volunteers from Prison Fellowship to work with vulnerable groups.

Our 'Duty of Care'

- a. Prison Fellowship has a duty of care towards all vulnerable people and will ensure that it provides a safe and secure environment for everyone participating in its activities. To that effect, we will assess all our activities to ensure that any safeguarding risks are identified and mitigated prior to delivering any activity or project. An activity risk assessment framework is provided in Appendix 4 for that purpose.
- b. Employees and volunteers of Prison Fellowship (and those of its partner organisations) are personally accountable for the way in which they work with vulnerable people. Therefore, all employees and volunteers have a duty to keep vulnerable people safe from harm. This is achieved by maintaining a respectful, caring and professional approach to work and by exhibiting behaviour that demonstrates integrity, maturity and good judgement.
- c. Prison Fellowship (and its partners) also have a duty of care toward their employees and volunteers under the Health and Safety at Work Act 1974 to ensure that they work in a safe and secure environment and to provide health and safety guidance and training.
- d. Staff and volunteers also have a duty to take care of themselves and anyone else affected by any action carried out in their work. They must avoid placing themselves in situations whereby allegations of abuse can be made against them.

3. General principles of Safe Working

4.1 Code of Conduct

The welfare of vulnerable people is paramount and should be borne in mind at all times and their safety should be put first before everything. PF has a Code of Conduct which staff and volunteers must follow in their work with vulnerable people and with each other. To that effect, staff and volunteers should:

- a. Always follow Prison Fellowship's Safeguarding Policy and Code of Conduct when working with vulnerable people
- b. Understand their responsibility to respect, safeguard and protect the children, young people and vulnerable adults with whom they come into contact as part of their work.
- c. Take responsibility for their own actions and behaviour and avoid any conduct which could lead to anyone questioning their motives and intentions
- d. Work in an open, transparent and accountable way.
- e. Report and discuss and/or take advice promptly from their line manager or another senior member of PF staff in the event that there is an incident or suspicion of an incident which may give rise to a concern.

- f. Record any safeguarding incidents or concerns and any decisions and actions taken to address the concern.
- g. Ensure that all records and reports are handled confidentially and stored in line with Prison Fellowship's Confidentiality and Data Protection Policies whilst taking the provisions of section 4.2 below into full consideration.
- h. Apply the same professional and ethical standards to everyone regardless of gender sexuality, race, ethnicity, language, physical or mental wellbeing or religious background.
- i. Know the name of the safeguarding contact person for their project and PF's Designated Safeguarding Person.
- j. Be aware that any breaches of the law or any professional guidelines including this policy or any associated policies can result in criminal or disciplinary action being taken against an employee or volunteer.

4.2 Exercising confidentiality – handling confidential/sensitive information

- a. Employees and/or volunteers may be given access to confidential information about vulnerable people as part of their work. This may include highly sensitive information such as the name and addresses of a Prisoner's relatives or friends. Such information should be held in the strictest confidence and should not be used by the employee or volunteer for their own personal advantage or shared with an unauthorised third-party.
- b. Confidential information must never be used to intimidate, humiliate, or embarrass a vulnerable person. When an employee or volunteer encounters situations involving the misuse of information for harmful purposes this should be immediately questioned and reported to PF's DSP refer to PF's Safeguarding Management flowchart).
- c. Confidential information about a vulnerable person should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the vulnerable person's identity does not need to be disclosed the information should be kept and used anonymously.
- d. There are some circumstances in which an employee or volunteer may be expected to share information about a vulnerable person, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities within Prison Fellowship or a partner organisation to which the vulnerable person is associated. Staff and volunteers should immediately inform PF's DSP if they have been approached by a third-party for confidential information about a prisoner or their family member.
- e. If an employee or volunteer is in any doubt about whether to share information or keep it confidential he or she should immediately seek guidance from the DSP. Should the activity or project involve work with a partner organisation, then the partner organisation's DSP should be informed.

- f. Due to the sensitivity of safeguarding issues, any media or legal enquiries should be passed to the Head of Fundraising and Communications who will liaise with the DSP and/or Chief Executive to address the enquiry.
- g. The storing and processing of personal information is governed by Prison Fellowships Data Protection Policy in line with the requirements of the Data Protection Act (DPA)1998 and the 2018 General Data Protection Regulations (GDPR). Prison Fellowship will provide clear-cut guidance to staff and volunteers about their responsibilities under both legislations.
- h. For the purposes of this guidance, information includes any oral or written material and digital imagery that is stored physically or electronically. Note that confidential information that is stored physically or electronically must be disposed of in line with Prison Fellowship's information storage, confidentiality and data protection policies which reflects the provisions and requirements of the DPA and GDPR.

4.3 Being in a position of 'authority' and 'trust' – trainers, chaplains and pastoral carer etc

- a. Working with vulnerable people could mean that an employee or volunteer is placed in a position where he/she exercises a certain amount of authority over an individual or group of vulnerable people and is therefore placed in a position of trust. Such positions include those of trainer, chaplain or pastoral carer etc. A relationship between an individual in a position of trust and a vulnerable person cannot therefore be seen as a relationship between equals. Thus, to avoid the potential for exploitation and harm of a vulnerable person, those in a position of trust must ensure that they do not use their position of power for personal advantage, gratification or abuse. Wherever possible, they should avoid behaviour which might be misinterpreted by others as exploitative. They should report any observable situation where this happens or could potentially happen.

4.4 Avoiding sexual contact and actions that can give rise to allegations of sexual abuse

- a. It is an offence to engage in sexual activity with or in the presence of a child or young person, or to cause or incite that child or young person to engage in or watch a sexual activity. This includes any manner or form of physical or virtual (online/electronic) sexual activity.
- b. Any sexual behaviour by an employee or volunteer with or towards a child or young person is both inappropriate and illegal under the Sexual Offences Act (2003). Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not. This includes the prohibition on adults in a position of trust under the Sexual Offences Act 2003.
- c. It is not unheard of for some young people to be strongly attracted to a person in authority over them or to develop a sexual infatuation. If this situation is encountered whilst working with a young person on a PF project or activity, it should be handled sensitively in order to maintain the dignity of everyone concerned. Staff and volunteers should understand that

such circumstances may involve words or actions that may be misinterpreted and result in allegations being made against an employee or volunteer.

- d. If an employee or volunteer suspects that a young person may be infatuated with themselves or a colleague, they should discuss this with their supervisor so that appropriate action can be taken to mitigate any risks.
- e. Note that sexual activity does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing a child to engage in or watch sexual activity including the production of pornographic material. Note that the Government's 'Working Together to Safeguard Children (2015) defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening'.

Grooming children - there are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person in order to manipulate that relationship so sexual abuse can take place. Employees and volunteers should be aware that conferring special attention and favour upon a child or young person might be construed as being part of a 'grooming' process, which is an offence. In addition, the grooming process is not restricted to just grooming children and young people. Adult family members can also be groomed by a perpetrator to gain confidence and access to a child or young person in a family. Employees and volunteers should therefore be vigilant and question any excessive or special attention placed on a child or young person by an adult in the conduct of their duties for PF. If you need to pass on any concerns about a child or young person you can complete a Passing on a concern about a child or young person form. Available in the Appendix or from the resources page on PF's website.

- f. **Criminal manipulation** – occurs when an adult prisoner embarks on a course of action in order to manipulate another person into criminal behaviour. This type of behaviour should be reported to PF's DSP if brought to an employee or volunteer's attention.

4.5 Handling other forms of 'Contact' with vulnerable people

- a. **Regular physical contact** - If some degree of physical contact is to occur regularly with a vulnerable person as part of a staff member or volunteer's role, then this needs to be established and agreed with Project/activity manager before such contact is initiated. A risk assessment of the degree and risk associated with the type of contact should be carried out prior to approval being given.
- b. **Physical contact** – Physical Contact with children and young people might be appropriate and acceptable on certain occasions but staff and volunteers must do so in ways appropriate to their professional role. A no touch approach is impractical for most staff and volunteers particularly those working on projects such as Angel Tree which might require some degree of physical contact with a child or young person. If a PF activity carries a risk of physical contact with children, young people or adult prisoners, staff and volunteers should apply professional judgement in assessing the appropriateness of the level of contact required and

should carefully consider the duration of contact, age of the individual, stage of development, gender and background.

- c. **Application of force** - Under no circumstances must physical contact involve the application of any kind of force against a vulnerable person as it will be regarded as physical abuse which can result in an allegation being made against an employee or volunteer.
- d. **Contact as a result of self-defence** - If an employee or volunteer finds him/herself in a situation where they must defend themselves from a physical attack by a vulnerable person as there is no other form of protection available, then the use of a reasonable means of defence including mild restraint is acceptable, provided it does not result in violence or physical or mental harm against the person in question. It is the responsibility of the employee or volunteer to determine what constitutes a reasonable means of defence and it should immediately be reported to PF.
- e. **Non-professional social contact** - employees and volunteers should not establish or seek to establish social contact with a vulnerable person for the purpose of securing a friendship or to pursue or strengthen a non-professional relationship. Even if the vulnerable person seeks to establish social contact or if this occurs coincidentally, the employee or volunteer should exercise his/her professional judgement in making a response and should be aware that such social contact could be misconstrued.
- f. **Written contact – PF’s Letter Link Project** involves corresponding with prisoners in writing. PF will ensure that correspondence between volunteers and someone who is in prison, YOI or STC is thoroughly vetted and that volunteers receive an appropriate level of training to enable them write safely to prisoners. More generally, when writing to a vulnerable person you should not:
 - i. Engage in dialogue of a sexual or inappropriate nature
 - ii. Use or encourage the use of inappropriate language
 - iii. Make or respond to any form of sexually explicit comments
 - iv. Send sexually suggestive material or request the same
 - v. Invite or encourage the person to meet with you while in prison or upon their release
 - vi. Discuss the person’s background or reasons for their imprisonment even if the person refers to this in their letter
 - vii. Jump to conclusions about the person without first checking facts
 - viii. Develop an unhealthy attachment towards the person or encourage such attachment to be developed.
- g. **Handling contact information** - under no circumstances should employees or volunteers give their personal details such as home/mobile phone number; home or email addresses or any other form of unofficial contact information to a vulnerable person unless the need to do so has been discussed and cleared by Prison Fellowship. In most cases this will also involve informing Prison Fellowship’s DSP for record purposes. Note that the responsible

parent or carer of a child or young person in question must also be informed of the exchange of personal contact information should this be approved by PF.

4.6 Conduct at work

- a. **Maintaining professional standards** - Staff and volunteers of Prison Fellowship should maintain a professional standard of personal conduct in order to maintain the confidence and respect of their colleagues and the vulnerable groups that they work with.
- b. **Dress and appearance** – should be appropriate, decent and safe in order to avoid potential criticism or allegation. Staff will be expected to consider the manner of dress and appearance appropriate to their professional role as this may be different to that adopted in their personal life. Volunteers should be advised likewise as part of their induction process.

4.7 Accepting and giving of gifts

- a. It is not acceptable practice for staff and volunteers working on Prison Fellowship projects or activities to regularly accept gifts of any sort from those they work with. However, it is acceptable to receive small tokens from children or parents who might want to show their appreciation to staff and volunteers at Christmas or any other festival or at the end of a project or as a leaving gift to a particular employee or volunteer leaving the organisation or project. On such occasions please refer to Prison Fellowship's 'Gifts Policy'.
- b. **Likewise**, it is also not permitted to give personal gifts to a vulnerable person you work with, as this gesture could be misinterpreted either as a bribe or an intention to buy a favour in return. Any reward given to a vulnerable person as part of a Prison Fellowship project should first be agreed and recorded in line with Prison Fellowship 'Gifts Policy'. It is preferable to give gifts as part of a recognised and agreed gift-giving scheme such as Angel Tree.

4.8 Handling 'one to one' situations

- a. Due to the nature of Prison Fellowship's work, staff and volunteers may from time to time be involved in activities and projects that involve One to One contact with vulnerable adults. However, it is not advisable to maintain one to one contact with a child or young person and there should be another employee, a volunteer or parent always present. Note that in both cases staff/volunteer may be more vulnerable to allegations therefore every attempt should be made to ensure that the safety and security needs of both staff/volunteer and the vulnerable person are met and that any potential risks that may give rise to allegations are mitigated.
- b. Pre-arranged meetings away from a Prison Fellowship venue should not be permitted unless senior management and any appropriate authorities have given approval for that purpose. Reference should also be made to Prison Fellowship's Health and Safety policy for more detailed health and safety arrangements.

4.9 Personal care

- a. Personal care involves helping children with aspects of care which they are not able to undertake for themselves, either because of their age and maturity or because of developmental delay or disability. Prison Fellowship does not anticipate the need for its staff/volunteers to provide personal care to a child as part of their duties unless such help is required due to an emergency.
- b. Should a child require the use of toilet or changing facility while at PF activity then its parent or carer should immediately be informed to make the necessary arrangement. If there is an emergency where assistance is required and no one else apart from a PF employee or volunteer is available, then they should ensure that another adult is in the vicinity and is informed of the 'personal care' task to be undertaken.

4.10 Handling photographic and digitally recorded material

- a. Some PF activities may involve taking or recording digital images as part of its promotional activity or event. PF staff and volunteers should be aware of the potential for recorded materials to be misused for illegal purposes that may harm those involved.
- b. When working with children and young people, staff and volunteers must first obtain the consent of the responsible guardians or legal carers prior to taking and displaying photographic images of the children/young people involved in the activity. See Appendix 6 for further details
- c. Careful consideration should also be given to how recorded images of children and vulnerable adults are taken, stored and displayed.
- d. Staff and volunteers should remain sensitive to any child, young person or vulnerable adult who appears uncomfortable with being photographed or recorded and should recognise the potential for misinterpretation. For example, a vulnerable person who has previously experienced abuse in this way may feel threatened by being photographed or filmed.
- e. Using images of children/young people for any form of publicity will first require the consent of the individual concerned and their legal carers. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the venue have access.
- f. It is recommended that when using a photograph or video recording, the following guidance should be followed:
 - I. Should a photograph be used to illustrate an article, avoid naming a child or young person and obtain prior consent of a vulnerable adult before naming them.
 - II. Should a vulnerable person be named in a 'sensitive' article, it is good practice to avoid publishing their photograph or recording in the said article.
 - III. When working with a partner organisation, PF should first establish whether any image or recording obtained will be retained for further use by both Prison Fellowship and its partner organisation.

- IV. Recorded film of children and young people taken at a Prison Fellowship event should be handled in line with the above procedure and consent should be obtained from a child/young person's parent or carer prior to taking and displaying such images.
- V. In the event that Prison Fellowship organises or participates in photographic or video recording activities with prisoners then permission should first be obtained from the prison authority and the participants, prior to the recording and displaying of any images.
- VI. Finally, all images and recordings involving vulnerable people should be securely stored and used only by those authorised to do so. Images and videos placed on PF's website should be password protected and, where appropriate, watermarked to avoid downloading for illegal use.

4.11 IT and Internet usage

- a. There are clear guidelines about how PF staff and volunteers should use the internet while carrying out their duties. Staff and volunteers should familiarise themselves with PF's IT Policy which includes protocols for email usage and handling of digital information, data and images.
- b. It is illegal to access, store or disseminate pornographic material involving children, and, if proven, will invariably lead to an individual being prosecuted and if found guilty, legally barred from work with children and young people. Therefore, under no circumstances should Prison Fellowship staff or volunteers access inappropriate images or recordings.
- c. Accessing, storing or disseminating pornographic and indecent images of any sort on PF equipment is also forbidden and will result in disciplinary action, dismissal and potential prosecution if an allegation is proven.
- d. Should any employee or volunteer be reported or suspected of accessing or sending inappropriate images or recordings while working for Prison Fellowship or whilst using Prison Fellowship equipment then the matter should immediately be reported to the DSP who will take appropriate action. This is particularly important where the welfare of a child or young person may be at risk as a result of such action.

4. Undertaking risk assessments

- a. PF will not place vulnerable people or its employees and volunteers in situations which expose them to an unacceptable level of risk, therefore, it is expected that all projects and activities will be risk assessed for safety prior to being delivered. It is good practice to monitor and risk-assess the safety of ongoing projects and activities on a regular basis.
- b. A risk assessment template is provided in Appendix 4 and should be completed by the person leading the project or programme in conjunction with the Safeguarding Administrator and DSP. The risk assessment process should identify safeguarding and health and safety risks that are reasonably foreseeable and should provide a risk mitigation plan to eliminate or reduce them to an acceptable level. In doing so, the risk assessment should give consideration to the following factors:

- i. What are the potential safeguarding and health and safety risks associated with the project or activity?
 - ii. Who might be affected by them?
 - iii. What safety measures need to be in place to reduce the risks to an acceptable level e.g. environmental measures, personal safety measures, training etc?
 - iv. What contingency plans are in place for those risks that form part of a PF activity e.g. training, counselling etc?
 - v. Who can implement the safety measures e.g. project leader or DSP?
 - vi. In what circumstances will the activity be stopped?
 - vii. What steps will be taken in an emergency?
- c. It is expected that the person who is leading the project or programme will monitor the risks that have been identified throughout the activity and take appropriate action as necessary. They should also look out for any new risks during the activity and establish further control procedures to mitigate them.
- d. A copy of the risk assessment record should be kept on file and should be regularly reviewed by the DSP. It is anticipated that any high-level safeguarding and health and safety risks will be incorporated into PF's organisational risk register and regularly reviewed by the CEO and Board of Trustees.

5. Reporting safeguarding incidents

- a. Should any form of safeguarding incident occur between a vulnerable person and PF employee or volunteer, whether suspected or confirmed, such activity should be immediately reported to a PF project supervisor or in their absence to PF's DSP. **Please follow the stages for reporting and addressing a safeguarding concern or allegation covered in Section 8 of PF's Safeguarding Policy document.**
- b. The employee or volunteer should be asked to step down from their role pending the completion of an investigation into the incident
- c. The DSP will (within reasonable time and following an investigation) inform the relevant authorities of the incident including any partner organisation that may be affected by the incident. PF's senior management team and Board of Trustees should also be informed of the matter.
- d. In the event of any other incident occurring, which may result in an action being misinterpreted and/or an allegation being made against an employee or volunteer, the relevant information should be clearly and promptly recorded and reported to the responsible supervisor or directly to the DSP in the supervisor's absence.
- e. The Initial Disclosure Reporting Form should be used to record the report and any action taken and sent to the DSP. The report should include information regarding any other report made to relevant statutory bodies such as the Local Authority Designated Officer (LADO), HMPPS, Social Services, NHS or the Police.
- f. An early discussion between the DSP and the parent or carer of any child or young person concerned in the matter could help avoid any misunderstanding.

- g. If the employee or volunteer is found to be the perpetrator of an incident, then formal disciplinary action will be taken and a report made will be sent to the DBS disclosure and barring team for consideration.

6. The DBS' barring process

The Disclosure and Barring Service (DBS) is the statutory body responsible for barring individuals who have been found responsible for perpetrating a safeguarding incident. (All safeguarding incidents should be reported to the DBS once they have been fully investigated by the reporting organisation. The following steps should be followed in order to report a safeguarding incident to the DBS):

- a. When a safeguarding incident involving an employee or volunteer has been confirmed by PF, the information should be sent to the DBS along with any recorded information and evidence regarding the incident. The employee or volunteer should also be given the opportunity to make representations to the DBS regarding the information.
- b. The DBS will consider this information, together with other information known on the individual, and decide whether it indicates that the individual poses a risk of harm to vulnerable groups. If so, the DBS will commence its barring process and the DBS will issue a disclosure certificate to the applicant with the barring information. If there is sufficient barring evidence, the applicant will be placed on either the **Children's Barred List** or the **Adults at Risk Barred List** or both depending on the offence. The applicant must not be allowed to work in a regulated activity for the duration for which they have been barred.
- c. Should a PF employee or volunteer be found guilty of perpetrating a safeguarding incident outside of their work for PF, PF may be informed of the incident by the DBS and will be advised to take appropriate action to ensure that the individual is removed from regulated activity with vulnerable people.
- d. Should relevant safeguarding information be disclosed in the process of vetting a PF employee or volunteer, PF will risk assess the information to determine the suitability of the individual to work with vulnerable people. If the individual is already working in a relevant role, PF will ask the individual to temporarily stand down from the role, pending completion of the risk assessment.

<p>Policy Issued by: Peter Holloway, Chief Executive (October 2018) Policy Reviewed by: Stephen Hawkins, Operations Manager (April 2021) Version 1.2</p>

Appendix 1 – Additional good practice for handling disclosures and allegations of abuse

1. Practical ways to deal with discovery or disclosure of abuse by a third-party

It is not anticipated that the majority of PF's employees and volunteers will be placed in a direct position of care towards vulnerable people, however there may be instances where they might come into contact with a vulnerable person who discloses that they or another vulnerable person has been a victim of abuse. Should this happen, the following steps should be taken:

- a) The staff member or volunteer receiving the report must inform their supervisor and/or the DSP immediately
- b) The alleged perpetrator must not be contacted or confronted (if known) by the person receiving the report.
- c) If possible, all observations of the victim and the alleged perpetrator must be recorded and the DSP informed immediately and in the strictest confidence
- d) The DSP will assess the situation and information given, if necessary initiate confidential discussion with senior management. If immediate action is required the DSP should contact the responsible statutory bodies including Social Service, Local Authority Designated Officer (LADO), NHS and Police. During any time-lapse, behaviour of the victim should be monitored and observations recorded. The DSP should undertake further investigation if necessary.
- e) If immediate medical attention is not required and physical evidence is not conclusive, the DSP will complete an Incident Resolution form and store this securely (see Appendix 2).
- f) If a vulnerable person alleges abuse, listen to them; record what the vulnerable person has said. It is important to respond to questions in a way that the vulnerable person feels comfortable with. Detailed questions should only be asked by a qualified Social Worker to prevent contamination of evidence.

2. Practical ways to deal with allegations against an employee or volunteer from young person

Staff or volunteers may be the object of provocative behaviour from a young person of the opposite or the same sex. In the event of an employee or volunteer being accused by a vulnerable person of perpetrating or engendering an abusive situation, PF should adopt an open-minded and thorough investigation of any allegation. To that effect, the following steps should be taken when an allegation or abuse is initially made against a member of staff or volunteer:

- a) All complaints and allegations must be referred to the DSP. The DSP will investigate the allegation to ascertain the veracity of the allegation.
- b) The employee or volunteer concerned may be asked to step down from their role with full pay whilst a thorough investigation is conducted. This in no way implies blame but is a measure taken to protect the young person and the employee.
- c) If the complaint is against a volunteer, then the alleged volunteer will be asked to refrain from volunteering for a stated period and will not be permitted to return until they have been contacted and briefed on the investigation.

- d) If the carer of the young person is not the complainant, they will be contacted by the DSP to be appraised of the situation i.e. in the event that the allegation is confirmed to be true.
- e) If the DSP is absent PF's CEO will act on his/her behalf throughout the procedure. When an allegation is received it is important to react immediately. The DSP/CEO should interview the informant and record the following information:
- Details of the young person and their family/carer
 - Nature of the allegation and the alleged staff/volunteer involved
 - Dates and times of the incident
 - Anyone else involved
- f) If an allegation is made directly against the DSP or CEO, it may not be appropriate to follow PF's ten step by step safeguarding resolution procedure. The allegation should instead, be reported directly to PF's Chair of Trustees who will interview the informant and record details of the allegation using the Initial disclosure form in Appendix 3. The allegation(s) should be thoroughly investigated without bias by PF's Chair of Trustees who may constitute an appropriate investigation panel to support them in this role. The Chair's decision should be recorded using the Incident resolution form in Appendix 2 and communicated to the relevant parties within 5 working days of the decision.

Appendix 2 - Prison Fellowship – Incident Resolution Form

This form is confidential and for use by the Designated Safeguarding Persons (DSP) within the terms of Prison Fellowship’s Safeguarding Policy and associated procedures

Note: Disclosures of abuse should be recorded as close to the time of the incident as possible. Please include as much detail as possible and record all information concisely. Record the information verbatim and do not try to interpret.

Activity/Project/Event/Premises concerned:	
Name of staff/volunteer reporting the incident:	
Role:	
Contact details:	
The Incident	
Details of incident Nature of concern/discloser made (include name(s) of the victim(s) and perpetrator(s) (if known):	
When did it happen (date, time)	
Where did it happen	
Any action taken (if no action was taken, state reasons)	
To whom did you report the incident? (give names and contact details):	
Outcome of Investigation	

Outstanding tasks, who is responsible and timescale	
Signed	
Date & time	

Name of staff/volunteer reporting the incident:	
Role: Contact details: Address Telephone number(s)	
1. Details of incident (include name(s) of the victim(s) and perpetrator(s) (if known):	
2. Action taken if any: (if no action was taken, state reasons)	
3. To whom did you report the incident? (give names and contact details):	
a) Outside agencies – for the protection of the person	
b) Parents/guardians/carer. You should only contact parents/guardians if the advice you receive indicates that you should do so.	
c) Other – state within or outside the organisation	
d) The responsible person for the project, event, activity:	
Details of the responsible person should be readily available at the premises or event venue	
4. Outcome of Investigation	
5. Outstanding tasks, who is responsible and timescale	
Signed:	
Date:	Time:

This form should be stored in a secure place. All notes made at the time should be kept with this form.

This form together with the Initial disclosure reporting form should be shared with the CEO and Board of Trustees for information or decision-making purposes.

Appendix 3 - Prison Fellowship - Initial Disclosure Reporting Form

_____ **Project/Activity**

This form is for use by the person who received the disclosure. This form is confidential within the terms of Prison Fellowship's Safeguarding Procedures

Note: Disclosures of abuse should be recorded as close to the time of the incident as possible. Please include as much detail as possible and record all information concisely. Record the information verbatim and do not try to interpret.

Completed by (Name):	
Activity/Project/Event:	
Role of staff/volunteer:	
Contact details:	
Date and time of disclosure/incident causing suspicion:	
Name and age of the child, young person or adult involved:	
Gender of child, young person or adult:	
If a person named in above is a child or young person, please give the names of their parents or legal guardians or carer:	
Details of adult or young person (if any) named as perpetrator: please give as much detail as possible	
Details of any witnesses	

Are you reporting your own concerns or responding to concerns raised by someone else (please tick as appropriate):	<input type="checkbox"/> Yes, I am reporting my own concerns <input type="checkbox"/> Yes, I am reporting concerns raised by someone else
<p>Please record details of the disclosure or the incident causing suspicion. This should be the account of the victim and please do not interpret the information given to you. It is important that you use the same language as the victim. Do not paraphrase or summarise. If the case involves physical abuse with bodily injuries, please, you may ask for the location of the injury but do not undress the person who made the disclosure or ask them to undress. Assure the victim that any information given will be held in the strictest confidence but please let them know exactly what you plan to do with the information. Also use this space if you are responding to your own concerns. Please continue overleaf or on additional sheets if necessary.</p>	
Action taken (include person/people/organisations contacted):	
Signed	
Date & Time	
Name of DSP	
Date & time when passed to DSP	
Signed by person receiving this form	
Date & time	

This form should be stored in a secure place. All notes made at the time should be kept with this form.

This form together with the Initial disclosure reporting form may be shared with the Board of Trustees and any other relevant parties for information or decision-making purposes.

Appendix 4 – Safeguarding Risk Assessment Form

Name of Risk Assessor:

Position:

Date of assessment:

Assessment Review Date:

<u>Risks or Hazards identified</u> What are the potential safeguarding and health & safety risks associated with the project or activity? And Who might be affected by them?	<u>Identified Risk</u>			<u>Actions needed to reduce risk</u> What safety measures need to be in place to reduce the risks to an acceptable level What contingency plans are in place for those risks that form part of a PF activity Who can implement the safety measures? In what circumstances will the activity be stopped? What steps will be taken in an emergency?	<u>Residual Risk</u>	
	Low (L)	Medium (M)	High (H)		Low/Medium	High

The hazard and probability ratings are: **Low** (monitor). **Medium** (regular reviews) **High** (stop activities/support immediately and reassess risk measures to continue interaction)

SIGNATURE:

DATE:

REVIEW DATE:

REVIEWED BY:

Appendix 5 - LETTER REQUESTING TO VIEW SAFEGUARDING POLICY OF PARTNERS



To whom it may Concern

Name of organisation

Date

Dear Sir/Madam

Request to view Safeguarding Policy

Further to our joint work with _____ (name of organisation(s)) on the _____ Project, we would like to request to see a copy of your current safeguarding policy. This is to ensure that both our organisations have a robust system in place to protect the vulnerable groups we work with.

Please find a copy of our Safeguarding Policy and Safer Working Guidance enclosed for your attention.

I look forward to hearing from you.

Yours sincerely

Designated Safeguarding Person

Appendix 6 - REQUEST FOR CONSENT TO PHOTOGRAPH OR VIDEO A VULNERABLE PERSON OR THEIR FAMILY MEMBER

PF logo/Letter head

To whom it may Concern

Name of organisation

Date

Dear Parent/Guardian/Carer

Regarding (name of activity/event/project)

Your ward _____ (name of subject) is participating in _____ (name of activity). As part of this activity Prison Fellowship (or name of project) will be involved in photographing/videoing participants for the purposes of _____ (please state purpose of photograph/video).

We are now writing to obtain your permission to photograph or film your child/ward as part of this activity. Please indicate below whether or not you consent to us doing so.

Please note that any digital images created and stored by Prison Fellowship will not be used for any other purposes than indicated above and will not be made available to the public without your consent.

Yours sincerely

Name and Job title

Consent

1. **Yes, I consent to** _____ (full name and surname) being photographed or filmed for the purpose of the activity described above.
2. **No I do not consent to** _____ (full name and surname) being photographed or filmed for the purpose of the activity described above.

Signed by:

Name of Parent/Guardian/Carer:

Relationship to subject: _____