

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 any one 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 prisoners in those facilities first, before everything 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 with any responsibility for 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 prisoner 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 'prisoner'

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

2.2 What is safeguarding?

- 2.2.1 Safeguarding includes everything an organization must do to keep children, young people and vulnerable adults safe, including minimizing 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/remand facility, 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 prison facilities, 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. It can take a number of forms, and some common examples of abuse that employees and volunteers might encounter include:
- **Sexual abuse** – involves a child or young person being forced or coerced into participating in or watching sexual activity. Participation could include physical or virtual (online/electronic) participation. It is not necessary for the child or young person to be aware that the activity is sexual and the apparent consent of the child is irrelevant.
 - **Physical abuse** – causes physical harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of failure to prevent injury from occurring.
 - **Emotional abuse** – occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

- **Bullying** - is behaviour by an individual or group, repeated over time that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, digital imagery or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation etc.
- **Neglect** – neglect is the persistent or severe failure to meet a child or young person’s basic physical and or psychological needs, such that it results in serious impairment of their health or development. Neglect can also involve not paying attention to a child or young person’s safety.
- **Financial (or material) abuse** – can involve taking a material or financial item such as money from a vulnerable person without consent of the owner or their guardian.
- **Parents who are themselves vulnerable adults** - It is not uncommon for the parents of children who are abused or neglected to be themselves vulnerable adults. Particularly common are problems of mental ill-health, domestic abuse and substance abuse (i.e. drugs and alcohol), often in combination.
- **Female genital mutilation** - This is an offence and any suggestion that it is being sought or has been carried out should be referred to the local authority children’s social care service or the police if reported to Prison Fellowship.
- **Trafficking** - is the bringing of children and adults into the country, sometimes without proper immigration arrangements, for a variety of illegal purposes which can include domestic service, illegal adoption, organ harvesting, benefit claims or prostitution.
- **Sexual exploitation** - Children can be exploited by being given rewards in return for sexual activities. Internet and other media technology may be used in the abuse. Violence, coercion and intimidation are common. Regardless of the challenging behaviours they may display, exploited children should be viewed as victims of child sexual abuse, not as criminals.
- **Forced marriage and honour-based violence** - Disclosures of actual or possible forced marriage should not be treated as a family matter or be disclosed to family members. Local authority children’s social care or the police should be contacted.

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

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 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 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 children and young 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 children or young 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** – is 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.

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.

- 8.1.1 **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.
- 8.1.2 **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.
- 8.1.3 **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.
- 8.1.4 **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.

- 8.1.5 **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.
- 8.1.6 **Step 5** – The DSP should follow any professional or legal advice or suggested good practice provided by relevant agencies while investigating the matter.
- 8.1.7 **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.
- 8.1.8 **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.
- 8.1.9 **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
- 8.1.10 **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.
- 8.1.11 **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

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

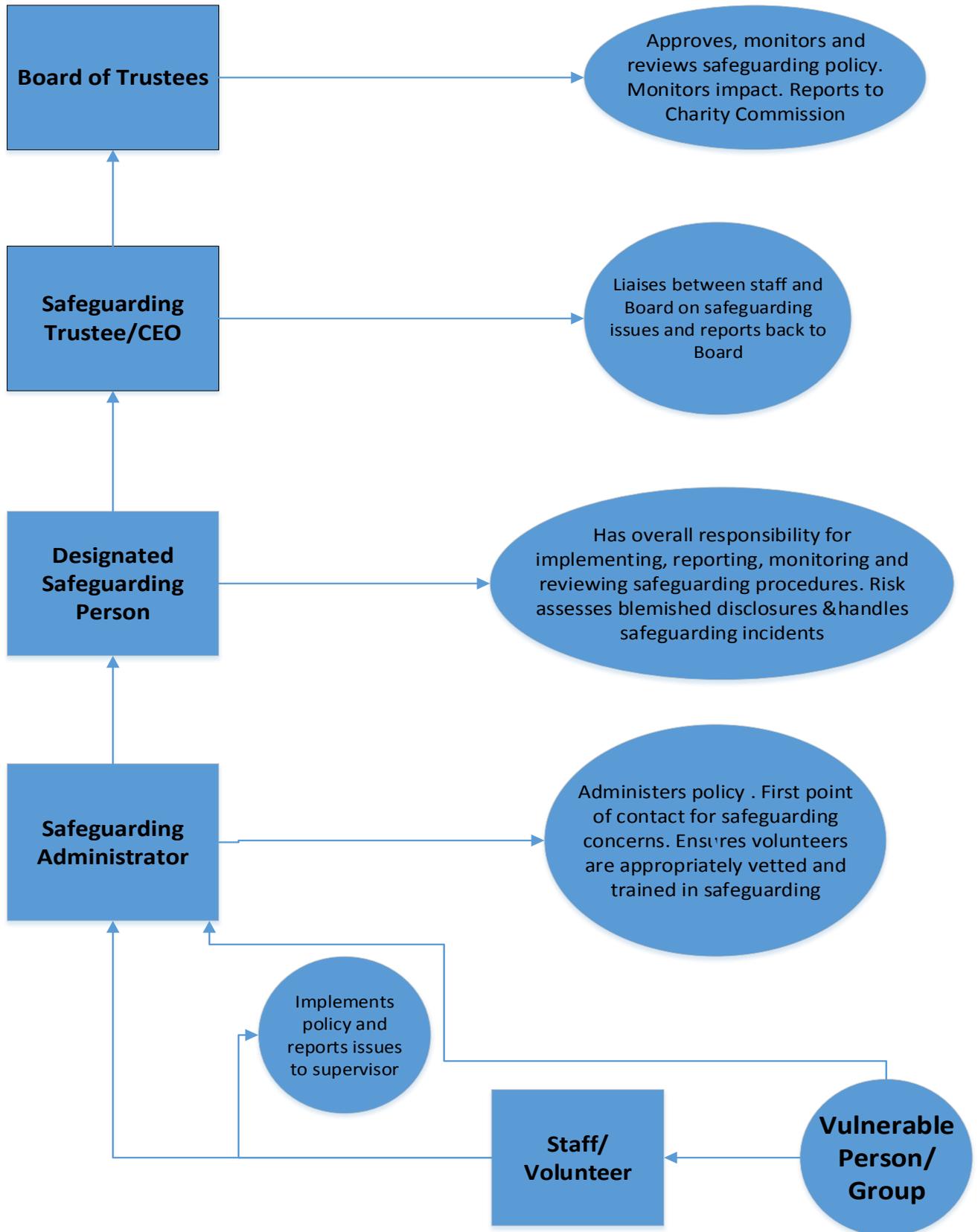
To that effect the following key safeguarding activities will be monitored:

- 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

- 11.2 This policy will be reviewed annually by the Chief Executive and DSP and reported to the Board of Trustees.

Appendix 1 Prison Fellowship - Safeguarding management & incident reporting flowchart



Issued by Peter Holloway, CEO

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