



Safeguarding Policy and Procedure for Christian Prison Resourcing

1. Aim

1.1 The aim of this Policy is to set out Christian Prison Resourcing'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. Christian Prison Resourcing (CPR) 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.

This policy aims to ensure that our trustees, chaplains, associates, and volunteers provide an appropriate and effective safeguarding response whenever a concern for an adult, child, or young person'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 also aims to ensure the safeguarding of all CPR trustees, chaplains, associates, and volunteers, within all their dealings with the prisoners, and officers within immigration removal centres and prisons, and that CPR workers feel supported by adhering to these agreed safeguarding practices. This policy is strictly for workers who are representing CPR, and does not apply if a CPR worker is working independently for HMPPS.

This policy is designed to complement and comply with HMPPS and IRC policies. Should there be any conflicting advice, please adhere to the HMPPS and IRC policy immediately, especially in line management and reporting procedure. Please report this conflict to the DSL to enable the issue to be rectified.

1.2. Our Commitment

Christian Prison Resourcing recognises that 'a prison', 'a young offenders' institution' and 'an immigration removal 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 make the safety of 'prisoners' in those facilities a priority and will encourage all our service users 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.

We are also committed to safeguarding all our chaplains, associates, and volunteers.

To ensure this happens, Christian Prison Resourcing will:

1.2.1 Challenge unacceptable behaviour and address all reported suspicions or allegations of abuse.¹

¹ Appendix 1 Monitoring and Reporting Procedure

- 1.2.2 Safely recruit all chaplains, associates, and volunteers through the use of appropriate vetting procedures either directly or through other agencies. ²
- 1.2.3 Provide obligatory online training in Safeguarding for all chaplains, associates, and volunteers.
- 1.2.4 Ensure that any physical premises on which Christian Prison Resourcing carries out its work meets all the standards required by Health and Safety legislation and ensures the safety of prisoners, their families and CPR workers.
- 1.2.5 Respond³ without delay to every complaint or report suggesting that a prisoner or a member of their family may have been harmed and co-operate with the relevant institution and authority in any investigation.
- 1.2.6 Offer first level support to any child or young person, vulnerable adult or CPR worker who informs us that they have suffered abuse in any form, and signpost them to an appropriate source of support. ¹
- 1.2.7 Challenge any abuse of power, by anyone in a position of trust in the course of carrying out any work with prisoners and their families.
- 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, and all staff are informed of changes and updates.

1.3. **Duty of Care**

We recognise that we have an obligation and duty of care to safeguard the adults, children, and young people with whom we work. 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.

The Trustees of CPR recognise their duty of care to all chaplains, associates and volunteers working in the prisons and immigration removal centres, and to those who have regular contact with offenders, ex-offenders, and their families.

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 on remand in a prison or young offenders' institution.

2.2 **Definition of 'resident'**

In this policy, a 'resident' is a person for whom accommodation is provided in a centre under UK immigration acts.

2.3 **What is safeguarding?**

Safeguarding includes everything an organisation must do to keep vulnerable adults, young people and children safe, including minimising the risk of harm and accidents and taking action

² Appendix 2 Safe recruitment

³ Further information relating to the expected response can be found in Section 7

to tackle safety concerns. Safeguarding is about **embedding practices** throughout the organisation to ensure the protection of vulnerable adults, children, and young people wherever possible. It includes the type of language used as well as actions that are taken, showing respect for everyone.

2.4 Who is a child/young person?

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.

2.5 Who is a 'vulnerable' adult?

Within the context of Christian Prison Resourcing's ministry - a vulnerable adult is anyone aged 18 and over who is held in a Prison or at an Immigration Removal Centre, or is an ex-offender supported by the charity. 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 for that individual to be considered a vulnerable adult. Christian Prison Resourcing staff must take both definitions into consideration for security vetting and other safeguarding purposes.

2.6 What is Regulated Activity?

2.6.1 For safeguarding purposes and in line with current legislation, an activity involving 'unsupervised' contact with children and young people and vulnerable adults, is considered to be a 'regulated activity'. Under the Safeguarding of Vulnerable Groups Act (2006) as amended by the Protection of Freedoms Act (2012) 'Regulated Activity' is defined as frequent and unsupervised contact for four or more days in a month or once a week and overnight.

2.6.2 An individual working unsupervised with children, young people or vulnerable adults 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). Any staff or volunteer working in prisons or the immigration removal centres will be vetted by the prison / immigration removal centre in which they work.

2.6.3 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. 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.

2.6.4 Activities taking place in a 'specified place' such as a prison/remand facility, detention centre, 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).

2.7 What is a 'Specified place'?

To obtain 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 regular basis. This includes prison facilities, schools, OFSTED

registered nurseries and crèches, immigration detention centres, 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.

2.8 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. All abuse disclosures whether deemed true or not, MUST be reported to a line manager (until a disclosure is passed to the line manager, it remains the responsibility of the person to whom it was reported; i.e. they would be liable for action). CPR recognise the rise in significant abuse / manipulation / exploitation through the use of mobile phones.

2.8.1 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 or vulnerable adult 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 or vulnerable adult to be aware that the activity is sexual, and the apparent consent is irrelevant.
- **Physical abuse** – is defined as causing 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, young person's or vulnerable adult'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. It can also take the form of harassment, which may not be recognised by the perpetrator, but, by law, if felt to be harassment by the individual being harassed, is unlawful.
- **Neglect** – neglect is the persistent or severe failure to meet a vulnerable adult's, 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 or vulnerable adult'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 (ie 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 social care service or the police, if reported to Christian Prison Resourcing.
- **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, disclosure made regarding this matter must be referred to the Local authority social care or the police. This should be done through the HMP procedures or through CPR's DSL.

2.9 What is 'Relevant conduct'?

Christian Prison Resourcing 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, young people, and vulnerable adults. '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 or is likely to endanger a child, young person or vulnerable adult
- conduct which if repeated against or in relation to a child, young person or vulnerable adult, would endanger them.
- 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 CPR chaplains, associates and volunteers** must follow guidance laid out in this policy and should report any safeguarding concerns using the procedure set out in section 8. We expect our trustees, chaplains, associates, and volunteers to be excellent role models and to contribute to developing safe working practices. The following positions within Christian Prison Resourcing's staff body and Board of Trustees have been identified as having specific safeguarding responsibilities within the organisation.

3.2 Board of Trustees

Christian Prison Resourcing's Board of Trustees have overall responsibility for ensuring effective safeguarding throughout the organisation. This responsibility will be delegated to David Fortune, the OBU Prison Sector Supervisor and Director of Ministry for CPR, who will work with the DSL to monitor and report any safeguarding concerns or incidents to the Board.

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

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 Christian Prison Resourcing'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 Establish a panel to hear appeals challenging an existing decision made by CPR which the victim or perpetrator deems to be unsatisfactory or unfair.

3.3 Designated Safeguarding Lead

The Board has appointed Aline Fynn as the Designated Safeguarding Lead (DSL). The DSL can either be an existing member of the Board of Trustees or anyone appointed solely for the purpose of the role. The DSL is responsible for implementing and monitoring this policy and, if appropriate, for reporting to the Safeguarding Trustee (David Fortune) and the Board. The DSL will:

- 3.3.1 Ensure that all aspects of this policy are implemented across CPR's work.
- 3.3.2 Liaise with Chaplains to ensure that all workers with safeguarding responsibilities are appropriately vetted in line with this policy, prior to taking up a role with Christian Prison Resourcing. N.B. it is the responsibility of each individual member of staff or volunteer to ensure that their DBS / CTC clearance is up to date through the prison service vetting department (every 5 – 10 years), this is not the responsibility of the DSL, HMPPS or ICR.
- 3.3.3 Ensure that all employees receive an appropriate level of safeguarding information and training that is commensurate to their duties. It is expected that all new workers will familiarise themselves with this document and that online training will take place for everyone every two years, with the provision for additional support should it be deemed necessary. Any new legislation will be shared with the Board of Trustees for them to advise all workers.
- 3.3.4 Liaise with CPR'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 CPR.
- 3.3.5 Ensure that any safeguarding concerns raised between Christian Prison Resourcing and its partner organisations are addressed and satisfactorily resolved. This ensures a further measure of protection should HMPPS raise an issue with a non-employed CPR worker.
- 3.3.6 Ensure that all vetting disclosures have been viewed and that blemished disclosures are appropriately risk assessed prior to a chaplain, associate, or volunteer commencing/resuming safeguarding responsibilities.
- 3.3.7 Receive and respond to all safeguarding reports and ensure they are fully investigated, recorded, and resolved in accordance with Christian Prison Resourcing procedures.
- 3.3.8 Ensure that there is an appropriate safeguarding monitoring and reporting procedure⁴ in place and that all chaplains, associates, 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 Christian Prison Resourcing and a third-party organisation or individual. For example, Open Day; Resettlement. This will include ensuring

⁴ Appendix 1 – Monitoring and Reporting procedure

that any premises on which a CPR activity takes place is safe and secure and that all relevant CPR chaplains, associates and volunteers are appropriately vetted and understand their safeguarding responsibilities.

3.3.10 Ensure that CPR projects have appropriate safeguarding standards for activities carried out with third party organisations or individuals. This will include any activity with prisoners, ex-offenders, and their families.

3.3.11 Ensure that volunteers working in Regulated Activities are fully and permanently supervised (at all times) while carrying out the role. 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'. Also note that, in some circumstances, a chaplain may meet with a prisoner alone in his/her cell, but this must have been agreed with the prison officer prior to any meeting taking place; in such cases, the cell door 'bolt is shot' / is left ajar and a prison officer is always free to pass by at intervals to check that all is well.

3.4 Chaplains, Associates and volunteers

All chaplains, associates and volunteers of Christian Prison Resourcing having substantial contact with vulnerable people (including 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. It is the responsibility of each individual member of staff or volunteer working within the prison sector to ensure that their DBS / CTC clearance is up to date through the Prison Vetting Department (every 5 – 10 years), this is not the responsibility of the DSL, HMPPS or ICR.

3.5 Managing Chaplain / Duty Governor

The managing chaplain / duty governor, working in the prison at the time an associate or volunteer is present, would be the first line of support. The Managing Chaplain / Duty Governor would be expected to take responsibility for managing any safeguarding report, for example, if a prisoner disclosed information of a safeguarding nature, if a prisoner verbally or physically assaulted a worker. An IR (Intelligence Report) or a SCR (Staff Corruption Report) must be completed irrespective of whether a Managing Chaplain or Duty Governor is available. If the intranet system is not accessible within HMPPS, the Managing Chaplain / Duty Governor or Oscar 1 will need to be contacted to facilitate this – if High Risk, before the end of the day. In such circumstances the DSL for CPR need not be informed.

4. Implementation

The scope of this safeguarding policy is broad ranging and it is our intention to embed a culture of good safeguarding practice. CPR's safeguarding policy will operate in conjunction with the HMPPS policy and both should be consulted if need arises. Any member of staff or volunteer working within the HMPPS environment should always pass safeguarding concerns to the line manager within the prison, whilst keeping a dated record of the disclosure.

These procedures are outlined below, however, some have been included with greater detail in the appendix.

4.1 **Safer Working Guide**⁵ – 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

⁵ Appendix 7 – Safer Working Guide

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. If a prisoner threatens a CPR worker either verbally or physically the managing chaplain should be informed as soon as possible.

4.2 CPR Recruitment Policy⁶ – will help Christian Prison Resourcing 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 vulnerable adults, children, or young people at risk. Anyone working within prisons or detention centres will be vetted through the DBS by the HMPPS or IRC.

4.3 The Recruitment of Ex-Offenders Policy⁷ – will ensure that Christian Prison Resourcing 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 Christian Prison Resourcing 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.

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

4.4 Whistle Blowing – CPR would expect all Chaplains, associates, or volunteers to inform on other staff/volunteer practices or any practices seen within prisons or Immigration Detention Centres, where there are suspected safeguarding concerns. **See section 7** of this policy. If the practice is noted from a prison worker, this must be reported to the managing chaplain who must report the behaviour to the appropriate member of HMP.

4.5 Giving and receiving of gifts – Chaplains, associates and volunteers should never receive from or give anything to a prisoner unless authorised through Chaplaincy or a Governor. Some 'gifts' have been authorised within the service and the 'gift' may be seen as generic for example, chaplains and associates are authorised to give and supply CPR Study courses, this is not authorised on a one-by-one basis. If in any doubt, the associate or volunteer should check with their managing chaplain.

4.6 Sharing of Information – Chaplains, associates and volunteers should never give their address, contact or family details to a prisoner. An exception being that some chaplains are permitted to give a mobile number/WhatsApp or CPR email address for resettlement purposes. Please note Appendix 4 for further information regarding the Data Protection Policy⁸

4.7 Confidentiality – All service users must be made aware of our duty to disclose any safeguarding or illegal incident or suspected incident to an appropriate member of staff or external body. It is illegal to withhold this information and must be passed on to higher authorities.

⁶ Appendix 2 Safer Recruitment

⁷ Appendix 3 Recruitment of Ex-Offenders Policy

⁸ Appendix 4 Data Protection Policy

4.8 Staff induction – ensures that new employees and volunteers familiarise themselves with Christian Prison Resourcing’s safeguarding culture and its policies and procedures. This will include regular online training and additional support if needed.

4.9 Safeguarding training, development, and communication – ensures that employees and volunteers are made fully aware of their duty of care towards vulnerable people and are provided with the knowledge and skills to implement this safeguarding policy. All staff and volunteers receive obligatory online training in Safeguarding every two years. This will include updated legislation and ongoing parliamentary debate. Additional support and safeguarding advice is available if required.

4.10 What to do if a disturbance breaks out – This will depend on where the disturbance occurs. It is required that CPR comply with the guidelines of the HMPPS / ICR establishments. Therefore, all chaplains, associates and volunteers should be familiar with their establishment guidelines if a disturbance breaks out - which is normally to withdraw to a safe place to allow for the prison officers to do their job.

5. Induction, Training and support for staff

Christian Prison Resourcing 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.

5.1 During induction new employees and volunteers will be expected to:

- Familiarise themselves with this policy document, the safe working practice guidance⁹, DBS vetting and safer recruitment procedure¹⁰, ‘Recruitment of ex-offenders’ policy¹¹, and Lone Working practice¹².
- Understand the safeguarding reporting processes and lines of responsibility associated with their role and project vetting and safer recruitment procedure¹³, ‘Recruitment of ex-offenders’ policy¹⁴, and Lone Working practice¹⁵.
- Undertake initial online training on safeguarding and child/vulnerable adult protection as relevant and provided.

6. Maintaining professional boundaries

6.1 CPR 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

⁹ Appendix 7 – Safer Working Guide

¹⁰ Appendix 2 Safer Recruitment

¹¹ Appendix 3 – Recruitment of Ex-Offenders Policy

¹² Appendix 6 Lone Working Prac1ce

¹³ Appendix 2 Safer Recruitment

¹⁴ Appendix 3 – Recruitment of Ex-Offenders Policy

¹⁵ Appendix 6 Lone Working Prac1ce

ensuring that an appropriate level of detachment is kept in place between both parties. See 4.5 and 4.6.

6.2 CPR's Safer Working Guide¹⁶ provides guidance on professional conduct that should be followed by staff and volunteers when working with vulnerable adults, or in contact with children or young people. A breach of professional boundaries or conduct by a Christian Prison Resourcing employee or volunteer could result in disciplinary measures taken against them.

7. Reporting and resolving safeguarding complaints, allegations and incidents

7.1 Christian Prison Resourcing will investigate and resolve any safeguarding concerns or allegations made against its staff or volunteers or where a report has been made to CPR about a prisoner's welfare. We will follow the steps below to ensure that any safeguarding concern, allegation, or incident is appropriately reported, recorded, investigated, and resolved. It is important that CPR staff / volunteers pass disclosed information to the prison officers or their line manager and keep a dated record of having done so - the incident then ceases to be the responsibility of the person to whom it was disclosed.

7.1.1 **Step 1** – Any member of staff or volunteer should report and discuss a safeguarding concern or incident with their immediate supervisor either verbally or by email. If the concern is about a prisoner or someone in the IRC, the report will comply with the institutions Safeguarding policy. However, if the disclosure concerns a member of CPR staff or volunteer, a written record will be completed by the CPR supervisor using CPR's Safeguarding Report Form¹⁷. This report will usually be investigated by the managing Chaplain however, where appropriate it will be sent to and discussed with the CPR's Designated Safeguarding Lead (DSL).

7.1.2 **Step 2(a)** – If the allegation concerns a member of staff or volunteer, the member of staff or volunteer will be asked to temporarily step down from their role with immediate effect until an investigation of the case has been completed.

7.1.3 **Step 2(b)** – If the concern was reported to a CPR member of staff or volunteer by a vulnerable person, the report should be date recorded in writing and passed to the relevant member of staff at the prison or Immigration Removal Centre, in line with their policy. However, if the concern involves a member of CPR, the HMPPS Governing Authority/ Managing Chaplain, the CPR Safeguarding Trustee (or the DSL) will investigate the report and inform all relevant external agencies of the incident. The Managing Chaplain / DSL should record the outcome of the investigation and report this to CPR's Board of Trustees.

7.1.4 **Step 3** – Where appropriate and as part of an investigation, the Managing Chaplain / DSL 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.

7.1.5 **Step 4** – Depending on the nature of the incident or concern reported, the Managing Chaplain / DSL may report the incident to the responsible local Police force in the first instance,

¹⁶ Appendix 7 Safer Working Guide

¹⁷ Appendix 8 Safeguarding Report Form

particularly if the incident or concern involves physical or sexual abuse, this is to ensure that the victim is protected from further harm.

- 7.1.6 **Step 5** – The Managing Chaplain / DSL should follow any professional or legal advice or suggested good practice provided by relevant agencies while investigating the matter.
- 7.1.7 **Step 6** – Should the allegation be confirmed as a genuine safeguarding incident involving a CPR staff member or volunteer, the Managing Chaplain / DSL should follow CPR’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.
- 7.1.8 **Step 7** – If there has been a genuine safeguarding incident and the perpetrator has been dismissed from their role at CPR, the incident and the perpetrator must be referred to the Disclosure and Barring Service by Christian Prison Resourcing’s Managing Chaplain / DSL. 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 CPR.
- 7.1.9 **Step 8** – Being placed on the DBS’ Child or Adult Barred list does not preclude CPR 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 CPR as long as it does not involve working with either or both vulnerable groups. CPR will risk assess a barred person before appointing them to any other role within CPR and will give due consideration to the requirements of its Rehabilitation of Offenders’ policy¹⁸
- 7.1.10 **Step 9** – In fulfilment of the Charity Commission’s good governance objectives, all safeguarding incidents and reports must be recorded and reported to CPR’s Board of Trustees and ultimately to the Charity Commission.
- 7.1.11 **Step 10** – Appeals - should either the victim or the alleged perpetrator be unhappy with CPR’s resolution of a safeguarding complaint, they may write to the CPR Board of Trustees to appeal/review the decision. This should be done within five working days of receiving the original decision. An ‘appeals panel’ should be constituted 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 a member of the Board be the subject of the complaint. The Chair should follow the same appeals procedure as described in Step 10.

8. Information sharing

8.1 All chaplains, associates and volunteers have a professional duty to share information with other agencies in order to safeguard vulnerable adults, children, and young people. CPR recognises that there may be occasions when the need to safeguard effectively may override confidentiality and necessitate the sharing of confidential information. Please note: this is only if the information is of a safeguarding or illegal nature, unless permission has been given by the individual sharing the information or unless names/ identities are removed. In such circumstances,

¹⁸ Appendix 9 - Rehabilitation of Offenders Policy

information may be shared on a need to know basis only and with the approval of Christian Prison Resourcing's DSL and The Trustees Delegated Person. Refer to the para 4.2 of the Safer Working Guide on confidentiality and information sharing.

8.2 CPR 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. CPR will also inform the police and other relevant authorities if it believes a relevant conduct has occurred (see para 2.7).

9. Monitoring

Christian Prison Resourcing will endeavour to monitor safeguarding good practice throughout its work. To that effect the following key safeguarding activities will be monitored by the DSL or the Director of Ministry.

- 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

10. Reviewing Policy

This policy will be reviewed annually by the Board of Trustees and DSL

Appendix

- 1. Monitoring and Reporting Procedure**
- 2. Safer Recruitment**
- 3. Recruitment of ex-offenders**
- 4. Data Protection Policy** – ensures that confidential data is stored and accessed securely and disposed of appropriately.
- 5. Lone Working Policy**
- 6. Safer Working Guide**
- 7. Safeguarding Report Form**
- 8. Resettlement Policy**