



## Safeguarding Policy

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## Statement of Policy

Sing Inside is committed to safeguarding its volunteers by ensuring that measures have been taken to protect and support individuals, to educate staff and to liaise with relevant authorities and organisations as appropriate. Sing Inside recognises that it has a duty to help and support its staff and volunteers recognise their responsibilities, minimise risk and avoid situations where abuse or neglect may take place. Sing Inside seeks to ensure that its policy and procedures comply with statutory duties, reflect guidance and good practice, and that safeguarding arrangements are proportionate and logical.

## Scope of Policy

Safeguarding is the action that is taken to promote the welfare of the people we work with and protect them from harm.

This Safeguarding Policy is intended to protect Sing Inside volunteers. Prisons own their own safeguarding policies and measures and are not formally accounted for here. Although we work very closely with prisons on safeguarding issues, prison-based participants must follow the safeguarding procedures of individual prisons, not Sing Inside.

This policy is to be read and understood by all trustees, committees and visit leaders. Volunteers should be briefed when appropriate on its key principles, reporting structure, and protocol.

## How to use this policy

All members of the Executive Committee and Local Committees should read the entire policy and sign the declaration form to confirm that it has been read and understood. Members of the Executive Committee will ensure that each Local Committee has been introduced to the policy and that its contents are understood during the committee handover process. Volunteers should read (EITHER: pages 9 - 13 of this policy or the abbreviated pre-visit safeguarding document) prior to their first and all subsequent visits.

## Terminology

This document does not refer specifically to adults as 'vulnerable'. It refers instead to adults who need care and support, who may be at risk of abuse. This is the wording used in the Care Act 2014 and is the common form of terminology in adult safeguarding practice. It also highlights the fact that a person's needs for care and support should not in a civilised society cause them to be inherently vulnerable.

## Key Principles

### **1. Empowerment**

Sing Inside will ensure that its volunteers and beneficiaries are supported and confident in making their own decisions and giving informed consent. Sing Inside has a responsibility to keep volunteers safe during visits and to provide support to those who require it.

### **2. Protection**

Sing Inside will provide policy, procedures, information, and training to enable all volunteers to identify and respond appropriately to concerns. This includes a robust incident reporting system and regular review of the organisation's systems.

### **3. Prevention**

Sing Inside will put sensible measures in place to prevent incidents, including open conversations with prison partners about potential risks, promoting safe working practice, and raising awareness of safeguarding.

### **4. Proportionality**

Sing Inside will take the least intrusive response appropriate to any risk presented, taking each person into account and respecting the rights of all individuals involved.

### **5. Partnership**

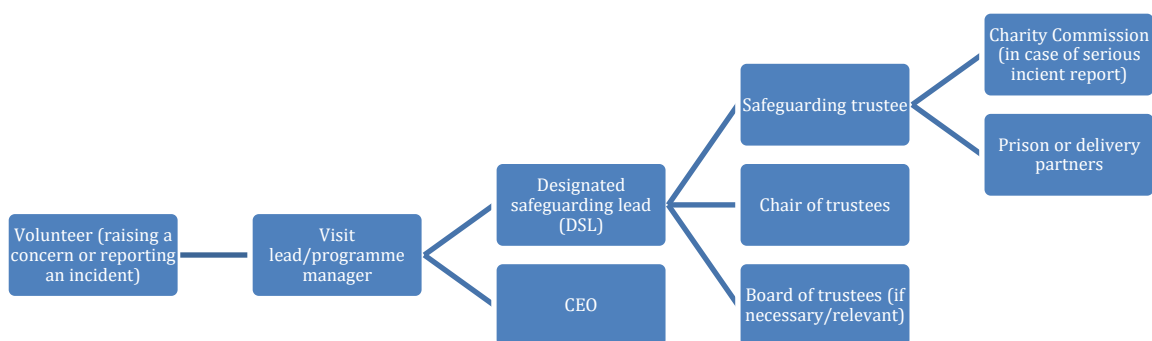
Sing Inside will work in collaboration with statutory, regulatory and any other relevant organisations to ensure that safeguarding concerns and developments are responded to appropriately.

### **6. Accountability**

Sing Inside aims to be transparent in our approaches and recognise the need for continuous learning and improvement at an executive level and in implementing safeguarding protocols.

## Safeguarding or incident reporting structure

This diagram sets out the reporting chain for occasions when a safeguarding concern or incident is raised by anyone within the organisation. In all cases, the designated safeguarding lead (DSL) should be informed as soon as possible, who will assess whether an incident report needs to be drafted and whether further escalation is necessary. The safeguarding trustee and chair will be informed as a matter of course; the full board will only be informed immediately if a serious incident report is being drafted or if there is significant external interest in the matter. Otherwise, all trustees will be updated on any safeguarding reports or incidents during the last quarter at each board meeting.



## Role Descriptions

### Head/Deputy Designated Safeguarding Lead (DSL):

- Advises & supports the rest of the executive committee and trustees in establishing the organisation's approach to safeguarding
- Maintains and reviews safeguarding policy and protocol and reporting procedures
- Coordinates distribution of policies, procedures and safeguarding resources across the organisation.
- Advises on training needs and provides training where appropriate
- Acts as the first point of contact for safeguarding advice, queries, and support to volunteers in conjunction with Local Committees
- Manages concerns, allegations and incidents reported to & within the organisation, including dispute resolution, any remedies, or referrals
- Manages referrals to key safeguarding agencies (eg social services or police) of any incidents or allegations of abuse and harm.
- Advises CEO on escalation of reporting

### Safeguarding Trustee:

- Scrutinises safeguarding policy
- Challenges organisational decisions from a safeguarding perspective
- Provides support to DSL and CEO where appropriate

- More info: <https://learning.nspcc.org.uk/safeguarding-child-protection/charity-trustees>

#### CEO:

- Works with and supports DSL
- Decides on the advice of the DSL, on behalf of Sing Inside, whether the Charity Commission and Chair of trustees are to be informed of any specific allegation or concern
- Responds to media and manages reputational risk

#### Programme manager:

- Manages local committees, so may be sent information regarding incidents and asked questions about processes
- Responsible for ensuring local committees carry out risk assessments and circulate the safeguarding policy to their prison contacts
- Responsible for circulating and keeping good records of service level agreements

#### Visit leader:

- Most likely to be initial point of contact for any on-site safeguarding reporting.
- Passes any information relevant to any given visit to the Head/Deputy head of safeguarding for them to take forward.
- Cooperate with any part of the investigation as necessary.

#### Volunteer

- Passes information regarding any actual or suspected safeguarding incident to the Visit Leader
- This information can be on behalf of another volunteer.

### **DBS Checking**

As soon as is feasible all Sing Inside staff shall undergo an enhanced DBS check. This includes the Executive committee and the President of each local committee. The Enhanced DBS check, which displays spent and unspent convictions plus any additional information held on police records that is reasonably considered relevant to their role. Trustees (except for the Safeguarding Trustee) undergo a basic DBS check which contains details of unspent convictions and cautions. The presence of any spent convictions on a DBS certificate and its impact on the individual's suitability for their role will be monitored on a case-by-case basis by the CEO and Chair of trustees.

It may be helpful for some members of staff or volunteers to undergo a full CTC (counter-terrorism check) and/or prison vetting. This security clearance can make it easier to enter multiple prisons within a short timeframe, or to visit the same prison multiple times, and recommendation from a prison staff member is needed. Sing Inside volunteers often visit high-security institutions; however, they are processed as individual 'visitors' and so not every visit lead or volunteer will need this clearance. It is most appropriate for senior management individuals within the Sing Inside team who are regularly conducting meetings or sessions in prisons outside of the normal visit context, where this clearance might aid organisation of such meetings. Sing Inside will assess on a case-by-case basis who on their team requires a CTC

check, and if deemed necessary, will seek recommendation from an appropriate prison partner.

## Safeguarding Training

Sing Inside commits to maintaining awareness of developments within safeguarding requirements and advice.

- As part of the briefing process, visit leaders will deliver a safeguarding brief which includes the key information from the safeguarding policy, including processes for reporting incidents or raising concerns about a volunteer or prison resident's wellbeing. Visit leaders will update Salesforce to confirm that this has taken place for all volunteers.
- The DSL will meet with local committee presidents at the start of each year to give safeguarding training.
- The executive committee and trustees should undergo online safeguarding training upon joining the organisation.
- The Safeguarding trustee and CEO should undergo in-person safeguarding training, with any further training to be undertaken on the advice of the DSL.
- The DSL should undergo all of the above training and multi-agency safeguarding training upon accepting their role as DSL.

All training will be delivered by a provider recommended by the Charity Commission or NCVO. Additional training, covering specialist topics such as safeguarding in prisons, working with adults who need care and support, mental health, and so forth will be covered on an ad hoc basis according to need and interest.

## Data retention

All safeguarding and incident reports from prison visits are logged digitally in a password-protected file removed from collective cloud storage and in hard copy, stored by the DSL. Information is coded and anonymised where necessary.

Sing Inside volunteers can report any incidents via the online post-visit feedback form circulated directly from Salesforce, Sing Inside's CRM system. Every volunteer will fill out this form after a visit, outlining anything they wish to report. This data will be visible only to specific accounts on Sing Inside's Salesforce database, usually the CEO and DSL. Any reports run to gather incidents reported will be anonymised. The information may be shared with trustees or other staff members as necessary, as well as external bodies, as appropriate. Safeguarding incident reports are kept for ten years as standard, and the DSL may extend this if they have reason to.

## Chain of responsibility for reporting

Volunteers should report any safeguarding concerns or incidents to their visit leader. This will be whoever provided them with their pre-visit briefing. The visit leader should then report any incidents to the DSL who will inform the prison safeguarding lead, the CEO, and if the concern or incident is serious then they will inform also the Safeguarding trustee. The CEO may take

the decision on the advice of the DSL to escalate any reports to other external bodies such as the police, seeking the consent of the victim where reasonable and appropriate. When a serious incident is reported to a prison it will also be reported to the Chair of trustees and Safeguarding trustee, who will then decide whether or not this incident is elevated to the Charity Commission. If at any time it is alleged that a criminal offence has been committed or may have been committed then the CEO will discuss the issue with the police. If the issue relates directly to the wellbeing of an adult at risk, then social services or similar local authorities will be contacted. If an incident is deemed serious enough to warrant a serious incident report to the Charity Commission, the CEO and DSL will draft this report in partnership with the safeguarding trustee and inform the full board of trustees of the report's content and the outcome from the Charity Commission.

## Reporting a safeguarding concern

### Receiving a disclosure from a volunteer: guidance for visit leaders

Visit leaders who receive a disclosure from volunteers should observe the following protocol:

- Remain calm, look at them directly and be honest
- Reassure the victim that they are listening
- Listen and keep listening until they have told you as much as they need to
- Do not ask leading questions or attempt to investigate
- Without commenting, show acceptance of what they are saying
- Explain that you cannot keep what they have told you confidential, tell them what will happen with the information and who you will need to tell. This is because you have a duty to pass information on when someone is at risk of being harmed
- Make accurate notes as soon as possible, ideally within an hour of a disclosure, signing and dating any paper used. Write down exactly what was said, how you replied, and the context of any disclosure. Pass these on to the DSL who will keep them securely.
- Where possible, hold this conversation in a suitable environment with minimal distractions. If a disclosure is made in a prison setting, wherever possible hold this discussion in a room separate from the workshop (and inform another visit leader or participant of your location. If the allegation creates a safety issue for remaining volunteers for the duration of the workshop, inform prison staff about the incident and if necessary request the removal of the relevant prison-based participant.
- If the disclosure is made on behalf of another volunteer, when appropriate, engage that volunteer for further information and confirmation of the allegation.
- If a disclosure is made regarding the conduct of another volunteer, use common sense and discretion as to whether to engage with that volunteer about the allegation in situ or as soon as is practicable after the workshop. Where the situation requires immediate intervention, visit leaders should work with the prison officer on duty to resolve the situation.

### Receiving a disclosure from a resident: guidance for visit leaders

- It is the prison which has ultimate responsibility for the wellbeing and safeguarding of its residents. While final responsibility will lie with the prison head of safeguarding, visit

leaders and volunteers should take any safeguarding concerns seriously and act accordingly.

- Observe the guidance listed for volunteer disclosures, with the following caveats
- If the allegation relates to another resident who is present, inform the prison officer on duty as soon as possible (immediate risk of further harm), and after the visit inform the DSL who may contact the prison head of safeguarding
- If the allegation relates to another resident who is not present (no immediate risk of further harm), inform the prison officer on duty at the end of the current session, and after the visit inform the DSL who may contact the prison head of safeguarding
- If the allegation relates to a Sing Inside volunteer who is present, inform the prison officer as soon as possible (immediate risk of further harm), and after the visit inform the DSL who will contact the prison head of safeguarding and the CEO/safeguarding trustee.
- If the allegation relates to a Sing Inside volunteer who is not present, inform the prison officer at the end of the session (no immediate risk of further harm), and after the visit inform the DSL who will contact the prison head of safeguarding and the CEO/safeguarding trustee.

#### Guidance for DSL following a disclosure or report

- Talk with the individual who has made the disclosure to establish facts
- Talk with whoever has received the disclosure to establish facts
- Decide the level of risk to the individual or another person and whether to make an onwards referral.
- Consult external advice and guidance where necessary, such as social services or the police.
- Inform the CEO and Safeguarding trustee
- Debrief the visit leader and formally relieve them of their responsibility in relation to the allegation. The visit leader will not receive further information about the incident but may be called upon to aid the progression of the investigation at a later stage.

### **Risk Assessments**

Prior to a visit a risk assessment form should be completed and shared with the prison. The purpose of this is to ensure that visit leaders are aware of the potential risks associated with a prison visit including but not limited to personal safety, equipment hazards, biological hazards, natural physical hazards, environmental impact and chemical hazards. Previous risk assessments may be used as a model, but an updated document should be dated and signed by the visit leader for each visit. After a visit the risk assessment should be reviewed and assessed in light of any incidents or near misses and any issues reported to the DSL if they relate to safeguarding, and to the CEO if for any other issue.

A risk assessment template for Sing Inside visits can be found [here](#).



## Volunteer Conduct & Safeguarding briefing procedure

### **Before a visit**

#### **Pre-visit briefing**

Sing Inside volunteers must participate in a briefing delivered by the visit leader either in person or via electronic means, this will include:

1. Safeguarding reporting procedures & key facts
2. Introduction to the prison environment and what to expect from residents
  - a. Including information specific to the prison being visited, such as the category of prison and the general makeup of its population (wider context about the prison system is also circulated to volunteers via [this page of our website](#))
  - b. Including information on prison-specific procedures such as security protocols on arrival or particular lunchtime arrangements
3. Introduction to effective communication and confident leadership in a prison context

#### **Security requirements**

- All Sing Inside volunteers must fulfil the security requirements mandated by each individual prison. Visit leaders have a responsibility to coordinate and distribute this information and ensure the accuracy of both this information and any responses required of volunteers.
- Hand in all valuables, mobile phones, recording devices and communication devices, and any such items that prison security requires to be surrendered in order to be admitted to the prison.
- In particular, all visitors to prisons, other than accompanied children under the age of 16, whether visiting for social, professional or official purposes, are required to prove their identity at the gate.
- As part of the sign-up process volunteers are asked to disclose whether they have an unspent criminal conviction, whether they know anyone currently serving a sentence, or if they have any other personal connection to the prison system. If it becomes apparent that they may know someone within the prison they are visiting, they may be asked to attend a different visit.
- Sing Inside asks these questions to ensure we can support the wellbeing of our volunteers where entering a prison space may cause any kind of concern. We will not automatically share information about any volunteer's criminal record with prisons. We will only share this information with prisons if they ask us to do so and this is necessary in line with their security procedures.

#### **Additional needs**

Volunteers with additional needs must have the opportunity to disclose these as part of the sign-up and pre-visit briefing process. This will enable visit leaders to act accordingly, assessing prisons for accessibility requirements and other risks in association with their prison contact and/or prison head of safeguarding.

## **During a visit**

### **Dress**

Sing Inside volunteers must wear appropriate clothes. This can vary from prison to prison, but, generally, this means:

- No tight, see-through or revealing clothing
- No open-toed shoes
- No torn or frayed clothing
- Minimal jewellery, with the exceptions of wedding rings and watches
- No clothing which features slogans that can be deemed racist, insulting or derogatory language
- No hats or scarves with the exception of religious headwear
- No gloves or sunglasses
- No scarves or umbrellas (as these are often prohibited by prisons)
- Long sleeves and trousers where possible

### **Conduct**

Sing Inside volunteers are encouraged to engage in a friendly manner with the residents and to use common sense in their interactions. Caution must be exercised so that comments - even when made in fun - or conduct cannot be misinterpreted. Volunteers should:

- Cooperate fully with internal rule and regulations of the prison concerned, made available to them during the mandatory pre-briefing
- Avoid showing favouritism towards particular participants in workshops
- Avoid building close personal relationships which could put anyone at risk
- Avoid asking residents details of their conviction or sentence
- Avoid making suggestive or inappropriate remarks to or about any other participant
- Not hand out any personal contact information such as home address, telephone numbers or email addresses, or accept such information from a prisoner
- Maintain confidentiality about sensitive information.
- Report any concerns or issues to the designated leader of the visit. This person will discuss this directly with an appropriate member of prisons staff with responsibility for safeguarding and agree further action as necessary.
- If a prison resident discloses something which is illegal or in breach of prison rules, e.g. being in possession of a mobile phone, then this information is passed on to the visit leader and prison officer on duty as soon as possible. Following the visit, the visit leader must pass this information on to the DSL and CEO who will contact the prison soon after the visit.

### **Physical contact**

Sing Inside volunteers must avoid unnecessary physical contact with participants. If physical contact does need to be made, for example to demonstrate a technique or correct position, permission should be sought from the individual, outlining the reason for the contact and asking if it is acceptable to proceed, only going on to make contact if permission is granted.

Appropriate touch may include:

- Administration of first aid by a trained first aider only
- Assistance to avoid embarrassment, e.g. if someone may fall
- Support and guidance for performing arts such as positioning
- Preventing injury

- Handshake / high fives
- Fitting equipment, e.g. microphones

### **After a visit**

#### **Debrief**

Sing Inside volunteers must take part in a debrief led by the designated visit leader, allowing a confidential forum to discuss the day's events. This is to ensure the emotional wellbeing of Sing Inside volunteers.

#### **Contact with residents**

Prison rules require prisons to actively encourage prisoners to maintain outside contacts. This is integral to the prisoner's Right to Family Life as well as their rehabilitation. Visits are seen as crucial to sustaining relationships with people outside of prison life and to help them maintain links with the community.

Sing Inside volunteers must not accept any contact details from residents, and must refrain from distributing their own details. In the pre-visit briefing all volunteers are informed that Sing Inside cannot facilitate any further contact between individuals. Any communication with prison residents outside of a formal workshop situation (for example, thank you cards) must be conducted between prison staff and Sing Inside as an organisation, rather than with individual volunteers. This can be arranged by Local Committees or the Executive Committee if necessary. The pre-visit briefing outlines that if any volunteer decides to enter into correspondence with a prison resident they meet via one of our workshops, they must inform the visit lead as soon as possible who will inform them that they will not be permitted to attend further visits to that site with Sing Inside.

#### **Local Committee**

Will ensure that:

- There is an accurate record of members in attendance on any given visit
- Ensure that safeguarding is a standing item on the agenda for Local Committee meetings. The designated leader for visits occurring since the last Local Committee meeting will give a report on safeguarding for that visit. This will include:
  - Confirming adherence to this policy
  - Brief details of any safeguarding issues which arose and the action taken
  - Any recommendations for improving the safeguarding procedure for Sing Inside and reporting these recommendations or referring issues to the Executive Committee where appropriate.

#### **Breaches of Policy**

Failure to comply with the Sing Inside safeguarding policy may be managed in a number of ways, depending on the nature and consequences of any incident. In some cases a combination of responses may be required. Approaches may include:

- Internal incident reporting process for review by members of the Executive Committee
- Cooperation with any external reviewer
- Serious incident reporting to The Charity Commission

- Police investigation

### Volunteer Wellbeing

Though Sing Inside workshops are often an uplifting experience for volunteers, the nature of the secure prison environment and the emotional intensity of the workshops can leave volunteers feeling upset or confused. The following resources may be useful to volunteers who have been emotionally affected by a Sing Inside visit:

- <https://www.prisonadvice.org.uk/>
- <http://www.partnersofprisoners.co.uk/>
- <https://www.prisonersfamilies.org/>
- <http://www.prisonreformtrust.org.uk/>
- <https://www.samaritans.org/>

### Disability and Accessibility

Sing Inside actively welcomes people with disabilities on its workshops and hopes that they feel able to participate fully in its activities. Some prisons, unfortunately, do not have fully accessible infrastructure, which can make access difficult. Volunteers with disabilities are encouraged to declare any access requirements or additional needs on the volunteer sign-up form, which will enable visit leaders to liaise with prisons to ensure as smooth a visit as possible.

### Whistleblowing

If a volunteer or staff member has serious concerns about a member of Sing Inside staff, including the behaviour of visit leaders and those on local committees, they may approach the following for support:

- The Designated Safeguarding Lead (07503349545)
- The Safeguarding Trustee (CONTACT DETAILS)
- Protect (Independent confidential whistleblowing advice) 0800 055 7214
- NOMS Reporting Wrongdoing Hotline 01527 544777
- The Charity Commission whistleblowing@charitycommission.gov.uk

### Review of this policy

- The Executive Committee will ensure that this document is reviewed and amended as appropriate every 12 months.

## Appendix 1: Safeguarding incident reporting form

This form is for use by the person who received the disclosure - in most cases, the visit leader - and should be passed on to the DSL when completed. This form is treated in accordance with the data retention policy outlined above and may be accessed by the DSL and CEO as appropriate.

See the section "Reporting a safeguarding concern" for guidance on how and when to complete this form. A copy of this reporting form is made available to volunteers via Salesforce if an incident took place which was not recorded physically during a visit, and physical records will be transferred to Salesforce in accordance with the data retention policy.

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 disclosure verbatim. Do not try to interpret.

|   |  |
|---|--|
| Completed by (name):                                      |  |
| Event/Location:   |  |
| Role at event/location:                                   |  |
| Contact details:<br>Address<br>Telephone number<br>Email  |  |
| 1. Date and time of disclosure/incident causing suspicion |  |
|   |  |
| 2. Name and age of young person/vulnerable adult involved |  |
|   |  |
| 3. Details of person named as perpetrator                 |  |
|   |  |

4. Name, age and contact details of any witnesses

5. Please record details of the disclosure or the incident causing suspicion. In relation to the disclosure, please do not interpret the information given to you. It is important that you use the same language as the person involved. Do not paraphrase or summarise. Please continue on additional sheets if needed.

6. Action taken (including person/people/organisations contacted)

Signed:

Date:

Time:

|  |                                       |
|--|---------------------------------------|
| Name and contact details of the Safeguarding Coordinator to whom you pass this form: | [Include Exec Safeguarding Lead here] |
| Date form passed to Safeguarding coordinator:  |                                       |
| Signed by Safeguarding coordinator:  |                                       |
| Date:  | Time:                                 |

## Appendix 2: Risk assessment proforma

[Risk assessment template.docx](#)

## Appendix 3: Adult safeguarding in prisons

The day to day safeguarding and wellbeing of prison residents is not the responsibility of Sing Inside. However, when the signs of abuse are present in any prison resident Sing Inside volunteers should report this by the means outlined above, namely by recording and reporting the incident to a member of the prison staff. The following information has been included to acknowledge the safeguarding practices of NOMS which are assumed to be in place in every prison.

This guidance has largely been taken from NOMS PSI 16/2015 *Adult Safeguarding in Prison*

See also:

PSI 21/2013 Reporting Wrongdoing  
 PSI 04/2012 Enablers of Services in Prisons.  
 Ensuring Equality PSI 32/2011

### Context

Her Majesty's Inspectorate of Prisons (HMIP) is moving to address the area of safeguarding within prisons. This is a largely unexplored area although a few councils are working with prisons in their area. Safeguarding responses to adults at risk within prison can be different to those in the community and action is rarely linked to local safeguarding processes.

HMIP has recently included a section on safeguarding in their methodology (*Expectations*) which is attached to this note. HMIP is committed to addressing the complex area of safeguarding in prisons and it is hoped that they can be supported in this.

The underlying principle is that *No Secrets* does not exclude prisoners. The recent Law Commission consultation suggests that the omission of explicit reference to prisoners should not prevent them from being safeguarded under the same principles as adults at risk in the community.

### Prisoners at risk

Examples of circumstances in which safeguarding interventions of the type described in this instruction may be required include prisoners:

- with care and support needs;
- With learning disabilities;
- with diminished mental capacity, as defined in the Mental Capacity Act 2005;
- Who habitually remain within their cells and/or have few possessions;
- who are being purchasing items for others and/or swapping property;
- who repeatedly break prison rules (this can be due to a lack of cognitive capacity and/or an inability to read notices rather than disobedience—safeguarding issues may easily be confused with a discipline problem).

### Abuse

Abuse is any act, or failure to act, which results in a significant breach of a prisoner's human rights, civil liberties, bodily integrity, dignity or general wellbeing, whether intended or inadvertent; including sexual relationships or financial transactions to which a person has not or cannot validly consent, or which are deliberately exploitative.



This may include:

**Physical abuse**—including any form of assault; misuse of restraint or inappropriate physical sanctions; withholding food or drink; force-feeding; wrongly administering medicine; failing to provide physical care and aids to living;

**Emotional or psychological abuse**—including verbal abuse; threatening abandonment or harm; isolating; taking away privacy or other rights; harassment or intimidation; blaming; controlling or humiliation;

**Financial or material abuse**—including withholding money or possessions; theft of money or property; fraud; intentionally mismanaging finances; borrowing money and not repaying;

**Discriminatory abuse**—including verbal harassment or other maltreatment due to a prisoner's protected characteristics (as defined in the Equality Act 2010 and explained in PSI 32/2011 Ensuring Equality);

**Institutional abuse**—including the use of systems and routines which lead to neglect of a prisoner.

**Sexual abuse**—including sexual assault, rape, inappropriate touching, molesting; pressurising a prisoner into sexual acts and non-contact sexual abuses such as indecent exposure, inappropriate looking, harassment, teasing, innuendo and simulation.

**Systems for preventing abuse by prison staff include:**

- Recruitment checks and security vetting
- Professional standards
- Professional relationships with prisoners
- Appropriate use of force
- Working together with Providers of Services

**Systems for preventing abuse by other prisoners**

- Standards of behaviour set and maintained
- Serious cases referred to police
- Incentives and Earned Privileges (IEPs) including encouraging individuals to help each other
- Segregation policies set out in Safer Custody document
- Peer Support policies set out in Prisoners Assisting Other Prisoners PSI 17/2015
- DBS information sharing as set out in Safeguarding of Children and Vulnerable Adults PSI 17/2015

**Systems for preventing abuse by others**

Management and Security of Visits PSI 15/2011 and Providing Visits and Services to Visitors PSI 16/2011 outline policies to ensure that visits are conducted in a way that prevents abuse

Prisoner Communication Services PSI 49/2011 describes the monitoring of telephone communications systems

**Protecting specific groups**

Young Adults: NOMS advises on the transition from youth to adult within custody, and collaboration between youth and adult estates

Women: Women Prisoners PSO 4800 describes how the gender specific needs of women prisoners are met, including the measures taken to address specific needs of women who are particularly at risk

of abuse or neglect, including pregnant women, those who have experienced domestic violence and those who have been involved in sex work.

Disabled Prisoners: Ensuring Equality PSI 32/2011 outlines the requirement to make reasonable adjustments for disabled prisoners

### **Reporting Abuse**

Non-directly employed staff

Non-directly employed staff are able to challenge and report suspected abuse or neglect of a prisoner by another prisoner in the same way as NOMS staff –see above and PSI 04/2012 Enablers of Services in Prisons.

Non-directly employed staff are required to challenge suspected abuse of a prisoner by other members of staff (NOMS or non-directly employed). Any incident of abuse should be reported directly to an appropriate NOMS manager, such as the manager responsible for the area in which they occur or the Duty Manager / Governor, and, if a non-directly employed member of staff is involved, to their employer.

### **Others**

Visitors, families and others individuals or organisations who are in contact with prisoners should report concerns about abuse or neglect to a member of staff (in person or by phone), or write to the Governor. In event that the suspected abuse or neglect is believed to be of a systemic nature, and/or contacting the Governor is considered not to be appropriate, concerns can be raised with the nominated officials listed in PSI 21/2013 Reporting Wrongdoing

The decision to allow any visit to a prison must be balanced against the need to maintain security and keep prisoners in lawful custody. The security measures that must be in place as part of the visits specification are set out in [PSI 15/2011](#). Visits must be well-managed, monitored and, where necessary due to inappropriate behaviour, terminated to maintain the good order and discipline of the prison.