

Ubumi Prisons Initiative: Safeguarding Policy



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Abbreviations

HIV – Human immunodeficiency virus

NGO – Non-Government Organisation

OIC – Officer in Charge

PEP – Post-Exposure Prophylaxis

PFF – Prisoners’ Future Foundation

PHAC - Prison Health Advisory Committee

ZCS – Zambian Correctional Service

1 Introduction

Ubumi Prisons Initiative (Ubumi) has been operating in Zambia since 2006 with the aim of improving the health of vulnerable groups in Zambian correctional facilities. This includes children 0-18 (including circumstantial children and children in conflict with the law), pregnant women, mothers, and seriously ill people, as well as the psychologically vulnerable. Support programs include health, including mental health, sanitation, education, skills-building and reintegration interventions inside and outside of correctional centres. In addition to working with incarcerated people, Ubumi also runs a farm in the community which employs a mix of people with and without a history of incarceration. In addition to employment, the farm also provides facilities for accommodation, if needed.

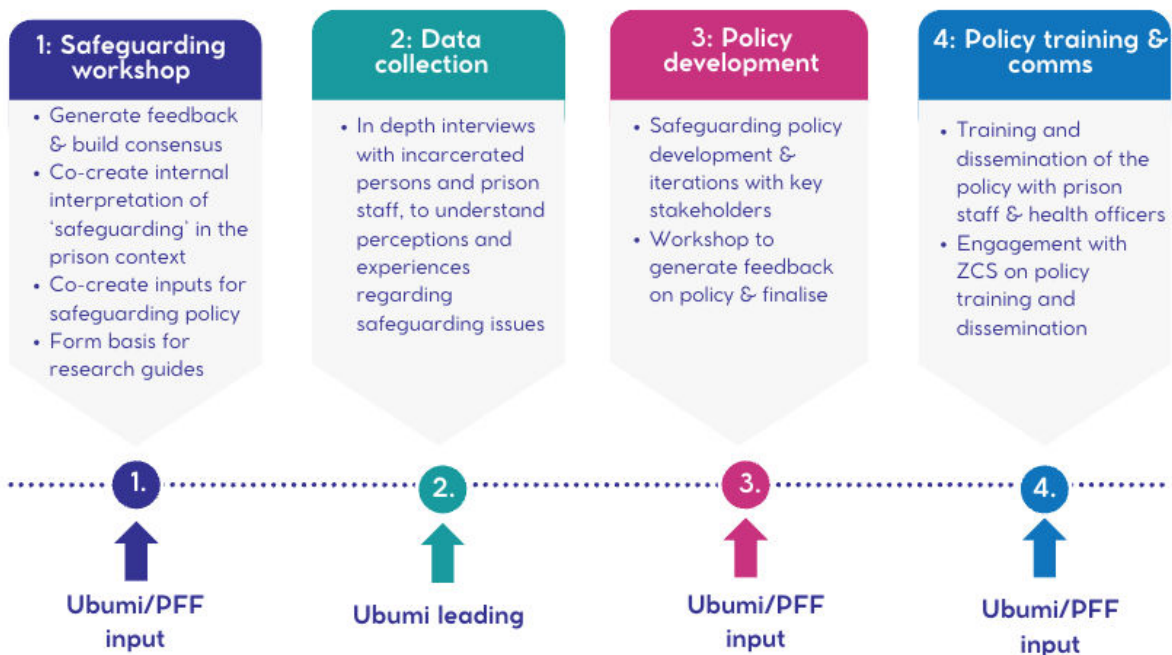
Ubumi means 'life - caring for everyone's life'. The name reflects Ubumi's fundamental values, which are rooted in universal human rights, enabling an individual's right to life, health and dignity. Given Ubumi's work with vulnerable groups, it has a duty of care to safeguard and promote the welfare of both children and vulnerable adults, whilst being committed to implementing safeguarding principles to the highest standards.

2 Considerations in developing this policy

This safeguarding policy has been developed in consultation with Ubumi's key partners and reflects statutory responsibilities, government guidance and complies with best practice requirements.

A key component of the consultation process included discussions with incarcerated persons, including adults (men and women), children, ill patients who are beneficiaries of Ubumi's programs, and volunteers who implement these programs, as well as Zambian Correctional Service (ZCS) officers and staff from several Non-Government Organisations (NGO) involved in providing programs within the Zambian correctional context. An outline of the process to develop this policy is outlined in Figure 1 below.

Figure 1. Policy design and dissemination process



As a result of this consultation work, several key observations have been highlighted and integrated into the policy below. Insights from the consultation process can be found in Annex 12.1

Examples identified of risk groups and potential situations that would place them at risk of harm are found in annex 12.2.

3 Policy Purpose

The purpose of this policy is to protect both the beneficiaries of Ubumi’s programs, as well as Ubumi staff implementing Ubumi’s programs from any instances where the individual’s safety is compromised. This may include instances where:

- Participation in an Ubumi program (either as a beneficiary, volunteer and/or staff member) has placed the individual at an undue risk of harm.
- An Ubumi staff member is made aware of an incarcerated person being at risk of harm generally (irrespective of whether the harm relates to the program or not)
- An incident occurs:
 - on the farm which places other employees at risk of harm.
 - during work hours (or whilst on a work trip), which places an Ubumi employee at risk of harm.

This policy aims to ensure that:

- All staff, volunteers inside and outside correctional centres, and partners of Ubumi understand their responsibilities in safeguarding vulnerable individuals.
- A clear framework for identifying, reporting, and responding to safeguarding concerns is established.
- A culture of vigilance and accountability continues to exist within Ubumi.

This safeguarding policy is not:

- A mandate to enforce or **change law or legislation**
- A mechanism to force consequences on individuals **out of the control of the organisation** (e.g. ZCS officers, inmates or staff from other organisations)
- An **advocacy** document

This policy should help staff to:

- **Recognise** and **identify** potential abuse
- Where appropriate, **speak to the individual** about whom you have concerns
- **Raise concerns** with your line manager who can then **seek advice** (if needed) from appropriate bodies / partners
- Keep an accurate **written record**
- Provide a mechanism by which to **report concerns** to the appropriate person or body
- It should act as a mechanism to:
 - **Avoid safeguarding incidents** while acting on those that take place
 - **Identify** and **mitigate risk** on an ongoing basis

4 Scope

This policy applies to all staff members, volunteers (both incarcerated and from the community), contractors, and partners who are involved in the implementation of programs managed by Ubumi, regardless of their role, pay level or location. It covers all activities and programmes carried out by Ubumi within Zambian Correctional Facilities and any other related environments.

Ubumi seeks to ensure the policy is understood and used by all relevant stakeholders including volunteers, staff and partners. In support of this, all individuals involved in the implementation of any program should be sensitised as to the contents of this policy prior to the commencement of activities. Failure to comply with the policy will be addressed without delay and may ultimately result in dismissal/exclusion from future activities and/or employment/engagement by Ubumi.

5 Safeguarding Definitions & Principles

5.1 Definitions

Please find definitions outlined below but note that this is not an exhaustive list.

Table 1. Key safeguarding definitions

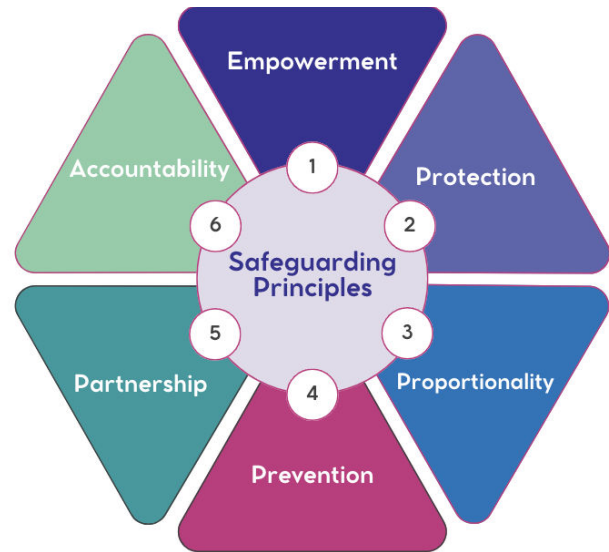
Term	Definition
Abuse	<p>Abuse can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take several forms, including the following:</p> <ul style="list-style-type: none"> ● Physical abuse ● Domestic violence and Domestic abuse ● Sexual abuse ● Psychological abuse ● Financial or material abuse ● Modern slavery ● Discriminatory abuse ● Organisational abuse ● Neglect and acts of omission ● Self-neglect
Child	<p>Ubumi regards a child per definition provided by Article 1 of the Convention on the Rights of the Child, 1989, “child means every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier.”</p>
Child and Adult Abuse	<p>Children and adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives. There are 4 main categories of abuse, which are: sexual, physical, emotional abuse, and neglect. It is important to be aware of more specific types of abuse that fall within these categories, they are:</p> <ul style="list-style-type: none"> ● Bullying and cyberbullying ● Sexual exploitation ● Criminal exploitation ● Trafficking ● Domestic abuse and abuse in the hands of duty bearers, such as prisons and psychiatric wards or orphanages ● Female genital mutilation ● Grooming ● Historical abuse ● Online abuse
Discriminatory Abuse	<p>Abuse based on a child’s or vulnerable adult’s age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.</p>
Financial or material abuse	<p>Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.</p>

<p>Neglect</p>	<p>The persistent failure to meet a child’s or vulnerable adult’s basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person’s basic emotional needs.</p>
<p>Physical abuse</p>	<p>Includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.</p>
<p>Psychological abuse</p>	<p>Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a child or vulnerable adult opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a child or vulnerable adult, which may include interactions that are beyond a child’s or vulnerable adults’ developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.</p>
<p>Sexual abuse</p>	<p>Sexual abuse - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities.</p>
<p>Sexual exploitation</p>	<p>Sexual exploitation is the abuse of a position of vulnerability, differential power, or trust for sexual purposes; this includes profiting monetarily, socially or politically from the exploitation of another. Child prostitution and trafficking of children for sexual abuse and exploitation is one example of this.</p>
<p>Vulnerable adults</p>	<p>A vulnerable adult is a person aged 18 years who has needs for care or support (whether or not the authority is meeting any of those needs) and who may be unable to take care of themselves or protect themselves from harm or abuse because of those needs. This may include a person who:</p> <ul style="list-style-type: none"> ● Is an incarcerated person ● Is elderly and frail ● Has a mental illness including dementia ● Has a physical or sensory disability ● Has a learning disability ● Has a severe physical illness ● Is a substance user ● Is homeless

5.2 Principles

Figure 2. SEQ Figure * ARABIC 3. Ubumi Safeguarding Principles

Ubumi is committed to the following safeguarding principles:



- **Empowerment:** Supporting individuals to make informed decisions and providing them with the necessary resources and tools to do so
- **Prevention:** It is crucial to take action to prevent harm before it occurs, which involves being proactive rather than reactive
- **Proportionality:** The response to any potential risk should be appropriate and proportionate to the level of risk prevented
- **Protection:** Supports and represents vulnerable individuals
- **Partnership:** Local services working in collaboration with communities can play a critical role in detecting, preventing and reporting neglect and abuse
- **Accountability:** It is essential to establish clear lines of responsibility for all those involved in providing care and support.

6 Procedures to Mitigate Harm

The procedures that must be followed by all to mitigate harm during program activities, include the person responsible for its implementation is outlined below in Table 2.

Table 2. Procedures to mitigate harm

Programme Stage	Procedure	Key Documents	Responsible Staff Member
Recruitment	<p>For paid staff, contractors & community volunteers:</p> <ul style="list-style-type: none"> ● Where possible, recruit staff and volunteers who have come recommended from trusted partners and sources ● Assess the suitability of candidates through interviews and other relevant assessments, including personal motivations and alignment of values with Ubumi. ● Candidates will be requested to provide criminal record documents to Ubumi which 	Hiring checklist	Country Coordinator or designated person conducting the recruitment

	<p>include details regarding specific details on the criminal activity.</p> <ul style="list-style-type: none"> For candidates with a criminal record, this does not warrant exclusion however a further assessment should be conducted regarding the offense, and the individual's record of conduct during their incarceration. Each case will be assessed on a case-by-case basis. With a final decision documented in the Hiring Checklist and approved by the Director and Country Coordinator. Verify character references <p>For inmate coordinators & inmate volunteers:</p> <ul style="list-style-type: none"> Identify potential candidates through trusted recommendations including officers, other inmates and NGO staff. Assess suitability through an interview including personal motivations and alignment of values with Ubumi. Consider vulnerability level of the candidate and whether this places them at risk of manipulation which may either place them or others in more harm. Document concerns & rationale for appointment in the hiring checklist. 		
<p>Probation Period</p>	<ul style="list-style-type: none"> All staff and volunteers (whether recruited from the community or whilst incarcerated) will receive a 3-month probation period to ensure they are a safe and suitable fit for the role Prior to the probation review, feedback should be sought from the staff/volunteers' peers and supervisor If behaviours and ethics are not aligned with the role and Ubumi policies, their contract will be terminated at the 3-month point 		<p>Country Coordinator or designated person conducting the recruitment</p>
<p>Training & Induction</p>	<p>Prior to conducting any activity in the field, all new staff, sub-contractors, volunteers, inmate-volunteers and staff employed by partner NGOs:</p>	<p>Code of conduct</p>	<p>Program Lead</p>

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	<ul style="list-style-type: none"> • Will receive a copy of the safeguarding policy and will be instructed to orient themselves. Afterwards, they will have a conversation with their supervisor on the main themes, including recognizing signs of abuse, and the procedures for reporting concerns • Safeguarding is included in all officers and inmate trainings, which includes how to recognise signs of abuse (physical, emotional, sexual and financial) and are aware of the specific vulnerabilities of the populations we serve. • Values Clarification Training to ensure that staff and volunteers explore how their own personal beliefs, morals and values may affect their professional behaviours. • Induction into Code of Conduct which they will then be required to sign. • Regular refresher training (approx. once a year) to ensure that all individuals remain aware of their safeguarding responsibilities. 	Training register log	
Monitoring & Supervision	<p>Ubumi will ensure that all staff, partners and volunteers are supervised and supported in their work with vulnerable individuals. Regular performance reviews and monitoring will be conducted to ensure compliance with safeguarding standards. This may include 360 feedback from a range of inmates, peers, managers and direct reports.</p>		<p>All managers</p>
During Program Implementation	<p>All staff, sub-contractors, volunteers, inmate-volunteers and staff employed by partner NGOs will:</p> <ul style="list-style-type: none"> • act as role models, and lead by example • document and report poor behaviour as it relates to Ubumi programs 		<p>All</p>
	<p>All safeguarding incidents (both suspected and confirmed) alongside the action taken will be documented in the safeguarding log.</p> <p><i>This should include incidents where sanctioning the offending person was</i></p>	Safeguarding log	<p>M&E Manager</p>

	<p><i>outside the remit of Ubumi. Nevertheless, appropriate reporting mechanisms should be activated and documented.</i></p> <p><i>Examples include:</i></p> <ul style="list-style-type: none"> • <i>Incidents with officers: reported to Officer In Charge (OIC)</i> • <i>Incidents with other NGO worker: reported to Director and Country Coordinator</i> 		
	<p>Mitigate the likelihood of a safeguarding concern against staff and other persons by for instance ensuring that staff are not completely alone with an inmate, but within vision range of another staff member or officer. The exception is medical examinations by medical professionals, where the patient or staff can request an extra person in the room if they so wish</p>		All

6.1 Individuals working outside of Ubumi’s scope and control

To ensure awareness and support of the policy amongst key stakeholders who are not held directly accountable to this policy, Ubumi will apply the following strategies to improve mitigating the risk of harm to incarcerated persons.

6.1.1 Yearly sensitisation of current policy

Ubumi will ensure yearly sensitisation of the existing policy to the following groups, along with reminders of existing formal & informal reporting mechanisms.

- Own Ubumi staff, volunteers and consultants
- Cell-captains and Special-Stage inmates in correctional facilities where Ubumi programs are being implemented
- Current civil society partners as relevant

During these sensitisations, any critical comments made by stakeholders that could further strengthen the policy, will be documented and applied to future iterations of this policy.

6.1.2 Advocate for ongoing training for ZCS staff

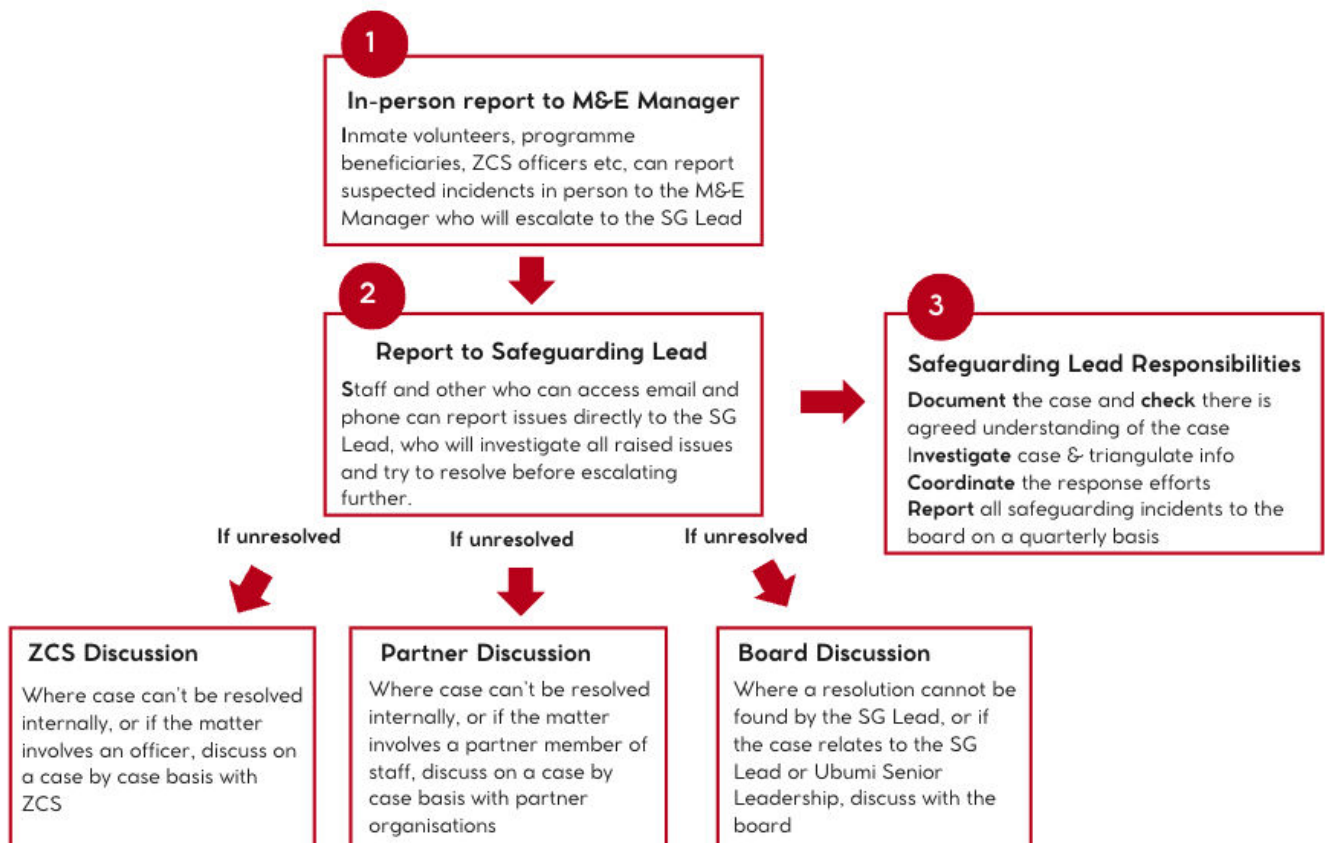
Through its work with PHAC and the ZCS Health Directorate, along with other opportunities as they present themselves, Ubumi will advocate for more in-depth training for ZCS around the issue of safeguarding (to protect both inmates and ZCS staff). Beyond safeguarding, this will also include advocating for training in mental health and gender.

7 Response and Escalation Procedures

7.1 Reporting and Escalation Process

A summary of the reporting and escalation process can be found in Figure 3.

Figure 3. Reporting and escalation process



7.2 Reporting Safeguarding Concerns

All concerns or suspicions of abuse must be reported to the Safeguarding Lead immediately who will ensure the complaint is immediately documented. Reports can be made in person to the M&E manager who will escalate the issue to the Safeguarding Lead. Otherwise, reports can be made directly to the Safeguarding Lead by phone, or through a secure email system. The Safeguarding Lead will assess the concern and determine the appropriate course of action.

A whistleblowing hotline will also be made available for Ubumi staff, volunteers, partners and beneficiaries, in situations where incidents require external support. The hotline will be manned by the M&E Manager (who will share issues with the Safeguarding Lead), who will have a separate phone for this.

Ubumi staff must report all suspicions concerns related to the Safeguarding Lead, regardless of the level of proof available.

7.3 Responding to Safeguarding Concerns

When a safeguarding concern is reported, the Safeguarding Lead will take into consideration both the safety of the individuals involved and will work to address concerns without ensuring further harm is caused whilst addressing the concerns. This will include:

- Taking immediate steps to ensure the safety of the victim/survivor involved.
- Show sensitivity and empathy for victim/survivors
- Record the concern in a confidential and secure manner in the safeguarding log
- Discuss the situation with the victim/survivor, and ensure their consent has been secured before taking additional steps
- Where appropriate and safe, consider methods to protect the victim/survivor's anonymity prior to taking additional steps
- Conduct a preliminary assessment to determine the nature and severity of the concern.
- Seek external specialist advice where necessary such as HR, legal expertise or medical advice (in cases of sexual or physical assault) and/or counselling support
- Consider trustworthy stakeholders who can be engaged to support the process (outside of Ubumi)
- Where safe and appropriate, and with the victim/survivor's consent, provide support to activate and follow-up existing reporting mechanisms (formal and informal) within ZCS.
- If necessary, report the concern to the appropriate authorities including ZCS, the police, child protection services, or other relevant agencies.

The implementation of these procedures may involve other staff from Ubumi and/or other organisations. This will be done with considerations for the ongoing safety of all persons involved in the complaint.

7.4 Supporting Affected Individuals

Ubumi is committed to providing support to any individual affected by abuse or exploitation. This may include counselling, medical care, or other forms of assistance as appropriate and possible within

available resources. The organization will work closely with local authorities and partners to ensure that affected individuals receive the support.

Types of support or referrals may include the following:

- Medical and clinic support, such as biomedical services (HIV testing, PEP, emergency contraception)
- Psychosocial support through in-prison services such as the clinic or structured group therapy or religious leaders.
- Psychological support
- Peer support services
- Referrals to the victim support units within the policy
- Peace building and restorative services for perpetrators

7.5 Escalation Procedures

7.5.1 Safeguarding Lead

Ubumi has a nominated safeguarding lead who is responsible for the day-to-day management of safeguarding issues within Ubumi programmes. This role includes:

- Ensuring that all staff and volunteers are aware of and understand the safeguarding policy.
- Providing guidance and support to staff and volunteers on safeguarding matters.
- Coordinating the response to any safeguarding concerns, including reporting to relevant authorities.
- Ensuring that:
 - All complaints and concerns, along with any actions taken, are documented.
 - A review of complaints and outcomes are reported to the director/board on a quarterly basis.

7.5.2 Whistleblowing hotline

Anonymous issues can be raised via the whistleblowing WhatsApp hotline which will be managed by The Safeguarding Lead. The review of messages etc may be delegated by the Safeguarding Lead to another member of staff.

The WhatsApp number is (+26)0 969494528.

Alternatively, a complainant can write to complaints@ubumi.org, which will be managed by the Safeguarding Lead.

In a case where the Safeguarding Lead is implicated, it is possible to write to the Director on ae@ubumi.org.

A complaints guideline outlining this procedure can be found on the Ubumi website (www.ubumi.org / www.ubumi.dk)

7.5.3 Escalating issues to the Zambian Correctional Service (ZCS)

There may be situations where incidents may need to be escalated to the ZCS, which should be considered on a case-by-case basis. Prior to alerting ZCS regarding safeguarding incidents, the following actions should be taken by Ubumi:

- A discussion with the survivor/victim to discuss consent and if/whether they would like to proceed with taking action
- An investigation of the situation, including an assessment of the available evidence
- Assessment of severity of the case, and risk exposure to the victim/survivor

8 Safeguarding in Programme Delivery

8.1 Risk assessment

Before the commencement of any programme or activity, the Ubumi Country Coordinator will conduct a thorough risk assessment to identify potential safeguarding risks. Measures will be put in place to mitigate these risks, and ongoing monitoring will be conducted to ensure that safeguarding standards are maintained.

5.2 Safe Programming

Ubumi will ensure that all programmes and activities are designed and delivered in a manner that promotes the safety and well-being of vulnerable individuals. This includes:

- Ensuring that activities are age-appropriate and culturally sensitive.
- Providing safe and secure environments for all activities.
- Encouraging participation and feedback from vulnerable groups to ensure their needs are met.

8.2 Use of Images and Personal Data

Ubumi will ensure that the privacy and dignity of vulnerable individuals are respected at all times. The use of images, personal data, or any other information that could identify an individual will be carefully controlled, and informed consent will be obtained before any such information is used.

9 Partnership and Collaboration

9.1 Working with Partners

Ubumi recognizes the importance of collaboration in achieving its safeguarding goals. The organization works closely with partners, including government agencies, NGOs, and community organizations, to ensure that safeguarding standards are upheld across all collaborative efforts. Partners will be engaged to support with referral and support services for victims/survivors, as well as for perpetrators where appropriate and possible.

9.2 Capacity Building and Training

Ubumi is committed to building the capacity of its partners and other stakeholders in safeguarding. This may include providing training, sharing resources, and offering technical support to ensure that all partners are equipped to protect vulnerable individuals. The whistleblowing hotline will be made available to all partners, volunteers and beneficiaries.

9.3 Safeguarding in Contracts and Agreements

All contracts and agreements with partners, contractors, and service providers will include clear safeguarding provisions. Ubumi will monitor compliance with these provisions and take action if any breaches are identified.

10 Communication Strategy

A range of communications and training methods will be utilised to ensure that all Ubumi staff, volunteers, beneficiaries, partners and supporters are aware of the safeguarding policy as outlined below:

Table 3. Policy Communication Strategy

Who should be aware of the policy?	How to build awareness among stakeholders?
All staff	<ul style="list-style-type: none"> ● Training and sensitization ● Project kick off meetings to include safeguarding procedures ● Safeguarding to be included in proposals as relevant ● Factor in additional costs for safeguarding into budgets

Inmate volunteers	<ul style="list-style-type: none"> • Training and sensitization • Raise awareness with other inmates
ZCS and other partners	<ul style="list-style-type: none"> • Launch event as relevant • Training and sensitization • Engagement meetings
Beneficiaries	<ul style="list-style-type: none"> • Training and sensitization • Raise awareness regarding how to report incidents • Translate policy communications into local languages
Government institutions	<ul style="list-style-type: none"> • Engagement meetings
Ubumi members	<ul style="list-style-type: none"> • Website • Newsletters • General assembly meeting
Donors	<ul style="list-style-type: none"> • 1:1 communications and engagement meetings • Included in reporting
Ubumi consultants	<ul style="list-style-type: none"> • Add safeguarding policy to contracts
General public	<ul style="list-style-type: none"> • Website

11 Monitoring and Evaluation

11.1 Regular Review of the Policy

This safeguarding policy will be reviewed regularly, at least once every two years, to ensure that it remains relevant and effective. The review process may involve consultation with key stakeholders, including staff, volunteers, partners, and the vulnerable groups we serve.

11.2 Monitoring Safeguarding Practices

Ubumi will implement a system for monitoring safeguarding practices across all areas of its work. This will include:

- Regular audits of safeguarding procedures and records.
- Feedback from staff, volunteers, and beneficiaries on safeguarding practices.
- Quarterly review of any incidents or concerns to identify lessons learned and areas for improvement.

11.3 Reporting and Accountability

Ubumi will ensure that safeguarding is a standing item on the agenda of management meetings. Regular reports on safeguarding practices and any incidents will be provided to the Board of Directors, ensuring accountability at the highest level.

12 Annexes

12.1 Key considerations identified from the safeguarding consultation process

Table 4. Key considerations identified from consultation process

Insight	Implication for policy
<p>Definitions of what “safeguarding” means in the context of an incarcerated population are varied and nuanced. This is largely a consequence of the intrinsically oppressive nature of incarceration, where individual agency and access to basic infrastructure that would allow an incarcerated person to feel “safe” (physically and emotionally) is highly limited.</p>	<p>Whilst there are macro-issues that need to be addressed to fully address the safety concerns of inmates including overcrowding, health system access, judiciary reform etc), here we intend to address concerns around inmate safety that has been compromised due to either neglect and/or malicious behaviour by an individual.</p>
<p>Whilst ZCS does not have a formal safeguarding policy, both informal and formal procedures are accepted to exist, which are used by incarcerated persons to report instances of unreasonable abuse</p>	<p>Where possible, Ubumi seeks to engage with and strengthen existing reporting channels that are in operation within the correctional community.</p> <p>All policy directives aim to provide pragmatic pathways to improve the safety of incarcerated people and Ubumi staff within the confines of what is possible in this context.</p>

12.2 High Risk Groups

Ubumi works with a range of groups who could be at-risk of safeguarding incidents. This list is not exhaustive and may be adapted, but includes:

- Female and male inmates
- Ubumi staff
- Ubumi farm trainees
- Inmate support group facilitators and members
- Inmate volunteers

- Pregnant women
- Children
- Circumstantial children
- Female officers
- Formerly incarcerated
- Illegal immigrant inmates
- People with mental illness or psychological vulnerabilities
- Families of inmates
- Prison health staff
- Chronically ill/seriously inmates
- Persons with disabilities

12.3 Sources of Risk and Mitigation Measures

Consulted stakeholders identified a range of possible risks that high-risk groups could be exposed to, and possible mitigation measures to address these risks were discussed as part of creating this policy. The content of the discussions is not included here for sensitivity reasons.

Table 5. Sources of risk and mitigation measures

High risk group	Type of Risk	Potential cause of risk	Mitigation
Pregnant women	•	•	•
Illegal immigrant inmates	•	•	•
Ubumi farm trainees	•	•	•
People with mental illness or vulnerability	•	•	•
Inmate support group facilitators	•	•	•
Inmate volunteers	•	•	•
Children	•	•	•