



Policy name: Circles of Support and Accountability (CoSA) Policy Framework

Reference: n/a

Re-Issue Date: 05 Sept 2024

Implementation Date: 31 May 2023

Replaces the following documents (e.g., PSIs, PSOs, Custodial Service Specs) which are hereby cancelled: N/A

Introduces amendments to the following documents: N/A

Action required by:

<input type="checkbox"/>	HMPPS HQ	<input type="checkbox"/>	Governors
<input type="checkbox"/>	Public Sector Prisons	<input type="checkbox"/>	Heads of Group
<input type="checkbox"/>	Contracted Prisons	<input type="checkbox"/>	Contract Managers in Probation Trusts
X	Probation Service	<input type="checkbox"/>	Under 18 Young Offender Institutions
<input type="checkbox"/>	HMPPS Rehabilitation Contract Services Team	<input type="checkbox"/>	HMPPS-run Immigration Removal Centres (IRCs)
<input type="checkbox"/>	Other providers of Probation and Community Services		

Mandatory Actions: All groups referenced above must adhere to the Requirements section of this Policy Framework, which contains all mandatory actions.

Context: His Majesty's Prison and Probation Service is committed to reducing sexual offending by working with people convicted of sexual offences to strengthen their motivation and ability to live offence-free lives, whilst effectively and robustly managing the risk that they pose. CoSA is a specialist provision which involves volunteers from the community to support individuals who are at high risk of further sexual offending, where social isolation is a criminogenic need, to develop social skills and connections in a safe way whilst holding them accountable for their behaviour.

Associated Documents:

- Implementation and use of OASys Sexual reoffending Predictor (OSP) Policy Framework - GOV.UK (www.gov.uk)
- Risk of Serious Harm Guidance 2020 (Risk_of_Serious_Harm_Guidance_March_2022.pdf (publishing.service.gov.uk))
- Probation Service (PS) - Travel for Persons on Probation (pi-02-2016-nps-offender-travel.doc (live.com))
- Recall, review and re-release of recalled prisoners - GOV.UK (www.gov.uk)

How will this Policy Framework be audited or monitored: Providers of Probation Services – compliance is monitored by Regional Probation Directors (RPDs).

Resource Impact: There is a finite budget available for CoSA, and it will be for Regional Probation Directors (RPDs) to ensure that referrals are targeted at individuals who meet the

criteria set out in the policy framework, and to monitor expenditure at a regional level. Where Regions wish to refer someone to CoSA who does not fit the criteria as set out in the policy framework, they will need to ensure that there are funds available from regional budgets and that practitioners know to seek approval from the budget holder before submitting a referral.

The contracts with the CoSA providers will be managed at a regional level by contract managers already responsible for contracts for commissioned rehabilitative services. Probation practitioners will need to refer to and engage with CoSA, and this will form part of sentence management activity. They are required to have regular contact with the CoSA co-ordinator to track progress and monitor and respond to any concerns raised as a result of the individual's involvement with CoSA. The number of individuals suitable for CoSA, however, will be very small and, as it is retained for people at high risk of committing a further sexual offence, it is likely that any additional resource required to monitor the individual's engagement and progress with CoSA will be off set against the circle making an important contribution to the individual's supervision.

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Approved by OPS for publication: Ian Barrow (Executive Director Probation), Operational Policy Sub-board Chair, April 2023

Revisions

Date	Note
9 October 2023	Minor amendments to text in paras 5.1 and 5.3
18 October 2023	Minor amendment to text in para 5.1
14 Feb 2024	Minor amendment in para 5.1 on isolation scores, and reduction in number of months from 18 to 15
05 September 2024	Change of wording throughout to reflect name change of OSP scores from OSP/C and OSP/I to OSP/DC and OSP/IIC Addition of para 5.6 to provide guidance on information sharing about circle members.

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1. Purpose

- 1.1 Managing people convicted of sexual offences is a key priority for the Probation Service. Sexual offending causes significant harm to victims, and it is our responsibility to use the most appropriate and effective measures available to us, to manage the risk, posed by specific individuals with identified risks and needs which research suggests are linked to reoffending, as well as to encourage individuals to reduce their likelihood of further sexual offending in the future.
- 1.2 Circles of Support and Accountability (CoSA) offer a specialist provision for people convicted of sexual offences who are at risk of committing a further sexual offence in the future. CoSA engage communities in a positive way to contribute to the rehabilitation and holding to account of those convicted of sexual offences. This involves using trained and well-supported volunteers to strengthen social contact, guidance and accountability to standards set out in a Code of Practice. The Probation Service has long recognised the valuable role that CoSA can play in the management and rehabilitation of people convicted of sexual offences.
- 1.3 In line with the principles of resource following risk, this policy framework intends to ensure that Probation Service RPDs with responsibility for local procedures have these in place. This will enable individuals whose management is likely to benefit from this intervention and are motivated to engage, to access CoSA. Probation practitioners should refer these individuals in accordance with the instructions in this policy framework.
- 1.4 This policy framework is intended to bring consistency and accessibility to the arrangements for using CoSA. It provides instructions about the identification of suitable cases for CoSA, the referral process, the expectations for information sharing and how CoSA activity should be recorded.
- 1.5 CoSA are generally used for individuals in the community, although there are projects that have worked with prisoners.
- 1.6 This policy framework does not cover commissioning or contractual arrangements for CoSA.

2. Context

The role of Circles UK (CUK)

- 2.1 Circles UK¹ is the national charity. It oversees the development, quality, co-ordination and effectiveness of CoSA. It does not deliver them. CoSA are delivered by CoSA providers. CoSA may be delivered by only providers who are formally affiliated to Circles UK and meet its standards and requirements as an approved provider. These standards are set out in a Code of Practice and other core manuals. CUK conducts biennial reviews of all CoSA providers to quality assure compliance with these standards. HMPPS supports CUK, through grant funding, to set and maintain standards across CoSA providers in England and Wales.

¹ Circles UK – Circles of Support and Accountability (<https://circles-uk.org.uk>)

CoSA providers

- 2.2 CoSA providers are the organisations which deliver CoSA. Each covers a different part of England and Wales. Some are charities which exclusively deliver CoSA and CoSA related services. Others are parent companies which deliver a wider range of criminal justice related services.

The Circles of Support and Accountability (CoSA) model

- 2.3 In the Circles UK model, the person on probation becomes the 'core member' of an 'inner circle' made up of 4-6 volunteers, ideally from the core member's local community. These volunteers form a communication and contact 'network' around the individual thereby reducing social isolation, helping the person avoid triggers to offending, and encouraging decision making and activities which promote desistance from further sexual offending. The 'inner circle' works with an 'outer circle' which comprises the probation practitioner and representatives of other statutory or partnership agencies involved in the management of the individual. There has to be both an inner and an outer circle for the Circles UK model to operate fully.
- 2.4 The primary role of the volunteers in an inner circle is to support the individual to develop social skills, connections and relationships which are safe and will promote desistance. Volunteers are also fully trained in the importance of identifying risk-related and safeguarding matters so that, when necessary, they can report any concerns that have been raised from the circles meeting to the professionals who make up the 'outer circle'. Volunteers do not contact the outer circle directly but do so via a CoSA co-ordinator, whose task it is to mediate between the 'inner' and 'outer' circle and whose role it is to support and supervise the circle process. CoSA co-ordinators are employed by CoSA providers and are trained professionals with a background in risk assessment and management and the issues surrounding sexual harm.

Phase One Circle (Formal process)

- 2.5 Phase One is the term used to describe a circle within the first twelve months. A Phase One Circle will meet regularly, initially weekly, for a formal circle meeting. Over time formal meetings will be less frequent, taking place fortnightly and then monthly. The CoSA coordinator will complete an End of Circle Report at the end of Phase One.

Phase Two Circle (Optional informal process)

- 2.6 During Phase Two, continuing contact is directed at facilitating independence and can be accessed when required in consultation with the Probation Service. When necessary, a circle in Phase Two can be reconvened to Phase One e.g., if the core member experiences difficulties which require more regular support or there are renewed public protection concerns.
- 2.7 Not all core members require a Phase Two Circle and not all CoSA providers offer it. When an individual may require Phase Two, the probation practitioner will discuss necessity and suitability for this with the CoSA coordinator, and the probation practitioner will decide whether it should go ahead or whether the circle should complete at the end of Phase One.

3. Evidence

- 3.1 Social isolation is a known sexual offending risk factor. For example, Mann et al. (2010)¹ found a lack of emotionally intimate relationships with adults to be predictive of sexual reoffending, as were negative social influences². For some people, social isolation may have contributed to their current and previous sexual offences. Others may not have been socially isolated at the time of their previous offending, but the likelihood of them becoming socially isolated will increase significantly once convicted of a sexual offence. For this reason, objectives to increase social connection and reduce isolation are an important aspect of sentence planning, however there are limited ways to do this which have both an underpinning evidence-base but also a clear model of delivery that incorporates risk management. The CoSA model, delivered to the set standards, meets these objectives.
- 3.2 The evidence regarding the effectiveness of CoSA is promising. There are gaps in the current evidence, particularly in relation to CoSA outcomes in the UK, as many of the published studies are relatively small in scale and the low base rates for sexual reoffending make it hard to detect its effect with this group. However, from the published research currently available there are some good indicators that when delivered to the right people to set standards, CoSA can support people to desist from further offending (Duwe, 2018, Clarke et al. 2017, Dwerryhouse et al. 2020, Lowe and Willis, 2019).³
- 3.3 In 2020, Circles UK published a qualitative study of 188 circles. This concluded that successful CoSA have a statistically significant and positive impact on Core Members. The independent research showed:
- an incremental reduction in assessed dynamic risk over time and a 20% reduction in assessed dynamic risk at nine months post-Circle start;
 - reduced social isolation. After 3 months on a Circle 96% of core members were in stable and suitable accommodation and 26% in paid or voluntary employment; this increased respectively to 100% and 42% at 9 months;
 - improved emotional wellbeing as measured by the Warwick-Edinburgh Mental Wellbeing Scales (WEMWBS) data. All core members had significantly poorer emotional wellbeing scores than the general population at the start of their Circle. 67% demonstrated significant improvements in wellbeing by the time their Circle came to an end;

Duwe, G. (2018). Can circles of support and accountability (CoSA) significantly reduce sexual recidivism? Results from a randomized controlled trial in Minnesota. *Journal of Experimental Criminology*, 14(4), 463-484.

Clarke, M., Brown, S., & Vollm, B. (2017). Circles of Support and Accountability for Sex Offenders: A Systematic Review of Outcomes. *Sexual Abuse*, 29(5) 446–478.

Dwerryhouse, M., Winder, B., Bladgen, N., & Lievesley, R. (2020). Conceptualising success and failure in Circles of Support and Accountability in Aggression and Violent Behavior, 55.

Lowe, G. Willis, G. (2019). Maintaining an Effective Circle: Volunteer Experiences of Operational Aspects of Circles of Support and Accountability. *International Journal of Offender Therapy and Comparative Criminology*, 63(3), 471–499.

¹¹ Assessing Risk for Sexual Recidivism: Some Proposals on the Nature of Psychologically Meaningful Risk Factors SEX ABUSE 2010; 22; 191 originally published online Apr 2, 2010; Ruth E. Mann, R. Karl Hanson and David Thornton

- behaviour highlighted by the Circle which leads to recall is a valuable outcome (in terms of protecting the public); and
- Circles may finish earlier than planned for positive reasons e.g., due to employment and pro-social networks

4. Outcomes

4.1 The aim of this policy framework is to increase access to CoSA for those whose risk factors are most likely to benefit from them. This will strengthen risk management and with sincere and constant engagement on the part of the offender, increase likelihood of desistance with those people convicted of sexual offences who pose the highest risk of further sexual offending where social isolation is a risk factor. This policy framework aims to achieve this by ensuring:

- Everyone who meets the eligibility criteria is considered for CoSA
- all practitioners are aware of, and apply, the eligibility criteria set out below when considering suitability for CoSA;
- there is a clear referral process and recording framework in place for all cases being referred to and involved in CoSA;
- practitioners are aware of their role in supporting and maintaining an individual's engagement with CoSA once it has commenced, and as the circle is coming to an end
- All parties understand expectations for information sharing when someone is subject to CoSA;
- there is clear guidance about how to respond to missed CoSA sessions; and
- probation practitioners understand how to record attendance with CoSA.

5. Requirements

Eligibility criteria

5.1 CoSA is intended for people at risk of sexual reoffending where social isolation is a key risk factor. Where someone fits the following criteria, the probation practitioner must discuss with the individual whether they would agree to a referral to CoSA. This is entirely consistent with the principles of risk/need/responsivity which guide our work. CoSA must, therefore, be targeted at individuals who meet all of the criteria below:

- Index sexual offence
- Very high, or high risk of serious harm
- Very high, high, or medium risk on OSP/DC or high risk on OSP/IIC*
- Social isolation is identified as a key risk factor in OASys (score 1 or 2) and is assessed as being linked to risk of re-offending and risk of harm
- At least 15 months left before their sentence ends
- Very likely to be settled in the same area for at least 15 months
- On licence or serving a community sentence
- The individual has agreed to a referral and has indicated their willingness to engage in CoSA

*As OSP scores are not calculated for women, this criterion will not apply to women

- 5.2 Where someone has been considered for CoSA and not referred but then circumstances change, such as motivation to engage or their location, that mean that CoSA may not be suitable, practitioners should re-consider referring them to CoSA.

Exceptions to above criteria

- 5.3 There may be exceptional circumstances where someone does not meet all of the above criteria but the probation practitioner considers that a referral to CoSA is necessary to help with their rehabilitation and to manage the risks posed by the individual. Examples of potentially exceptional cases may be where all other criteria are met but:

- they are low risk on OSP;
- their supervision is likely to terminate before the circle ends so they will no longer be on statutory supervision when the circle completes;
- the index offence is a non-sexual offence, but it is clearly sexually motivated; and there are sufficient concerns to indicate a risk of further sexual offending.

- 5.4 The PDU Head or Head of Public Protection must approve all referrals for any case that does not meet the eligibility criteria but is considered an 'exceptional' case – they should record this on NDelius as a 'management oversight' entry.

Referral arrangements

- 5.5 Where a potential core member meets the eligibility criteria for CoSA, the probation practitioner must discuss CoSA with them. Where they are motivated to engage with CoSA, the probation practitioner must submit a referral to the provider who will undertake an assessment of suitability before accepting the referral. Managers must support the referral to and delivery of Circles in accordance with this policy framework for all eligible cases. All CoSA referrals must be completed and submitted electronically via secure email, with a copy of the referral uploaded to NDelius, and an entry made on NDelius to confirm when the referral was sent and to whom. The practitioner must create the NSI at the same time the referral is submitted. The practitioner must provide the person on probation with the privacy notices of both Circles UK and the relevant provider to ensure they agree before submitting the referral form.

Completing the referral

- 5.6 It is important that the probation practitioner includes the right information in the referral form to provide the Circles co-ordinator with sufficient information about the risk the individual poses. This information should enable the co-ordinator to accurately assess suitability for a circle, and then share this information on to volunteers before the circle commences. However, the information that practitioners include in the referral form needs to be necessary and proportionate, and therefore must **not include** details that are not necessary to communicate the risk issues in the case. See *Annex 1* for information sharing guidance when making referrals.

It is essential that the risk information provided by the probation practitioner in the referral draws on **all** of the individual's current and previous behaviour. That is, whilst they would not include the details of spent convictions, (see Annex 1), they must share information about the overall risk that individual poses which takes into account this information.

- 5.7 Whilst practitioners should discuss CoSA with all eligible individuals, and refer those who agree to participate, the CoSA co-ordinator will make the final decision about accepting or rejecting a referral. If the individual is identified as posing any potential risks to volunteers at the referral stage, the probation practitioner will discuss risk management strategies with

the CoSA coordinator and other members of the outer circle. Where the risks to volunteers are assessed by the outer circle as unmanageable, the circle must not proceed, and the referral will be rejected. If risks emerge or escalate once a circle has commenced, the CoSA coordinator will inform the outer circle, including the probation practitioner, and no further circles meetings must take place until measures to manage the risk are implemented including a managed early termination of the circle where necessary.

- 5.8 For people in prison, being released from prison particularly after serving a lengthy sentence, can create additional barriers and challenges for those already socially isolated, with no social support in the community. Where a CoSA referral may be suitable for someone in prison who is coming up for parole, it will be essential for the probation practitioner to discuss the CoSA referral with them and gain their consent to be referred and to engage with CoSA, prior to including this within their risk management plan. If CoSA is included within their proposed risk management plan and sentence plan, this may inform the Parole Board's decision to release them from custody.

First Circle meeting

- 5.9 Once a referral has been accepted, the CoSA co-ordinator will set up an initial planning meeting with the probation practitioner, and any other members of the outer circle, to meet with them and the volunteers to provide information about the individual's offending behaviour, risk factors and needs. This is called the First Circle meeting. The individual can attend this meeting should they so wish, but this is not compulsory. The probation practitioner is responsible for inviting the core member to the first circle meeting,
- 5.10 The first weekly CoSA meeting must not take place until this First Circle meeting has taken place.

Role of the probation practitioner as part of the 'outer circle'

- 5.11 Once an individual commences with CoSA, the probation practitioner and the CoSA coordinator will need to establish and maintain regular liaison to ensure that:
- there is a regular and immediate sharing of risk-related information both ways;
 - the probation practitioner is fully aware of the progress the individual is making with the circle and can use this to inform other aspects of their sentence plan or management;
 - the probation practitioner can support the individual and motivate them to attend, particularly at points where they may be indicating intention to disengage;
 - the probation practitioner can, where applicable, update any formal MAPPA meetings about the individual's compliance and engagement with CoSA;
 - the probation practitioner can inform Lifer or IPP panels of the individual's involvement and progress with CoSA; and
 - the probation practitioner can support the individual at the point their involvement with CoSA ends, including planning towards its end to consider what alternative support mechanisms they can draw on.

Responding to new risk related information

- 5.12 The probation practitioner is required to update the CoSA co-ordinator of any new risk-related information that they are aware of, in advance of the next circle meeting. As outlined above (5.6) information should only be shared where this may impact on the Safety of volunteers, the public or where volunteers may be asked to specifically look for evidence of risk-related behaviours.

- 5.13 Equally, the CoSA co-ordinator must immediately share any risk-related information gathered from the circle meeting with the probation practitioner. The definition of 'immediately' for the purposes of this action means within 24 hours *unless* the new information indicates that the individual poses an imminent risk of serious harm or raises any immediate concerns regarding safeguarding. In that instance, the information must be shared by the CoSA co-ordinator with a member of the outer circle by the end of the working day. If no one from the outer circle is available, the CoSA co-ordinator will follow locally-agreed emergency contact procedures. If the CoSA co-ordinator is still unable to contact anyone and there is an immediate risk, they will call 101 or 999 as appropriate. Volunteers will also have access to emergency contact procedures.
- 5.14 Where risk-related information is provided to the probation practitioner, the probation practitioner is required to consider whether the recall threshold is met, in line with the Recall, Review and Re-Release of Recalled Prisoners Policy Framework.

Recording and responding to non-attendance at a circle meeting

- 5.15 All CoSA-related sessions must be recorded on NDelius. If someone fails to attend for an initial assessment with the CoSA co-ordinator, this should be recorded on NDelius as 'failed to attend for initial assessment', with an explanation as to the reason why and whether a further assessment appointment is going to be arranged.
- 5.16 If someone fails to attend for a circle meeting, this should be recorded on NDelius as 'failed to attend for circle meeting' with an explanation as to the reason why, and the date of the next circle meeting.
- 5.17 If the individual has made contact with the CoSA co-ordinator in advance of the circle meeting to advise they will not be attending, the CoSA co-ordinator will notify the probation practitioner. Where possible (depending how soon before the circle meeting this is known), the probation practitioner should attempt to contact the individual to discuss this and to encourage them to attend.
- 5.18 Engagement with CoSA is voluntary in the sense that the individual must be willing to attend and engage with volunteers in order to be referred to CoSA, but once an individual has committed to engaging with CoSA this becomes an important part of their sentence plan and risk management plan. This is particularly relevant for those cases released subject to a parole decision where the RMP has included engagement in CoSA.
- 5.19 Practitioners should always consider the possibility that failure to attend a circles meeting could be an indication of reduced compliance with supervision which is an indication of an increase in risk. They should therefore actively investigate every non-attendance. In some instances, there may be acceptable reasons for non-attendance; however, where practitioners consider non-attendance to be linked to an increase in risk or to render the risk management plan ineffective for someone on licence, they should review the action they need to take as a result. Where the evidence indicates that the risk is no longer manageable in the community, recall action should be taken in accordance with the recall policy framework.
- 5.20 To summarise, non-attendance at a circle meeting per se is not enforceable. That is, if someone does not attend for the circle meeting, they should not be issued with an enforcement letter. **However**, it is essential that the probation practitioner follows up any non-attendance immediately to understand the reason for the non-attendance, particularly

where the individual is subject to licence. Where there is any evidence that the nonattendance is linked to an increase in risk, this should be discussed with their line manager and recall action should be considered.

Disengagement with CoSA

- 5.21 Whilst providing support to individuals convicted of sexual offences is central to the CoSA model, the thread of accountability throughout the model means that it is not necessarily an easy or comfortable intervention for the individual to become involved with. Across the life of the CoSA, there will be occasions where the individual is asked questions about their history of sexual offending or their sexual thinking. They will also be held to account for their future behaviour, to cause 'no more harm'.
- 5.22 There will be occasions where some individuals commence with CoSA but disengage prematurely in an unplanned way. Any early disengagement with an intervention or support will require the probation practitioner to explore with the individual, before they disengage, their reasons for this. Sometimes their reasoning may be a decline in motivation, or feelings of guilt and shame being triggered for their previous behaviour, which the practitioner will be able to support them to work through and continue with CoSA. In some instances, however, disengagement may be an indication of risk escalation. The probation practitioner must always, therefore, remain professionally curious if the individual is indicating that they are intending to disengage and, where CoSA does come to an end prematurely, their risk assessment must be reviewed.
- 5.23 Whilst being involved with CoSA is a voluntary arrangement, for someone who was released on parole the probation practitioner must consider any disengagement from CoSA in relation to the release decision. If the disengagement is considered to indicate an increase in risk or changes delivery of the RMP so that risk is no longer deemed manageable in the community, the probation practitioner must consider enforcement action including recall, and discuss the case with their line manager.

End of a circle

- 5.24 The aim of CoSA is to improve social connections and strengthen reintegration; thus, for many core members, the end of involvement in circles will signify a positive progression but for others it may represent the end of support and relationships that they have found beneficial and do not want to come to an end. For these reasons, the end of a circle represents a significant change in the individual's sentence and must trigger a review of the risk assessment. Reviewing the risk assessment will prompt consideration of how CoSA has impacted on both the individual's risk and protective factors and whether there needs to be any additional measures added to the RMP given that CoSA has ended.
- 5.25 Prior to the circle ending, it will therefore be important for the probation practitioner to plan with the individual for life after the circle comes to an end and to explore options for them to access additional support elsewhere should they need to. The aim of the circle is to improve their social connections and strengthen reintegration thus, hopefully, they will have an improved lifestyle once the circle ends than they did before starting but, nevertheless, the end of the circle should still be considered as a significant change.

Recording

NDelius

- 5.26 All appointments and events linked to engagement with CoSA must be recorded on NDelius. Full recording details can be found in the Case Recording Index available on Equip.

OASys Risk Management Plan

- 5.27 Whilst the primary aim of CoSA is to target the need area of 'social isolation', there are also clear links between CoSA and risk management. The individual will be meeting on a regular basis, often in public settings, with a group of volunteers, and these meetings will be focused on how to enable the individual to lead a life without sexual offending. Consequently, it is possible that the volunteers will hear information from the individual or observe behaviours which may be linked to risk. The circle model is based on an expectation that any risk information is passed immediately to those responsible for managing the individual (the outer circle). For this reason, CoSA should be considered as part of the 'Intervention' pillar within the RMP.

Sentence Plan

- 5.28 It is important that, where someone is being referred to or has started CoSA, the probation practitioner includes this within their sentence plan.

ViSOR

- 5.29 Any risk-related information gathered as a result of the circles intervention must be dealt with appropriately and be recorded on ViSOR by the probation practitioner.

Travel costs

- 5.30 In line with the policy for reimbursing travel costs, where the individual is eligible for reimbursement, they can have their travel expenses reimbursed locally to support them to attend circles meetings.

Protected characteristics

- 5.31 A CoSA referral can be submitted for all individuals, regardless of their protected characteristics. Probation practitioners must identify, within the referral form, any of the individual's protected characteristics or needs to enable the CoSA co-ordinator to assess suitability for CoSA and to match them with volunteers to best meet their individual needs and promote engagement and connection.
- 5.32 It will be important for the probation practitioner to set out in the referral form any specific needs or requirements that the CoSA coordinator should be aware when setting up CoSA meetings. This could include physical considerations such as the need for wheelchair access or hearing loops for example, or geographical and logistical considerations such as travel needs, meeting timings and location.

6. Constraints

- 6.1 CoSA is targeted specifically at people convicted of sexual offences. Probation practitioners must only refer individuals for CoSA if they meet the eligibility criteria set out above. It is not suitable for people convicted of other types of offences, unless there is evidence that the offence was sexually motivated.

Release to Approved Premises

- 6.2 CoSA is suitable for someone released to an Approved Premises and then transitioning into the community. A circle may even be set up ahead of move on. When considering a referral for someone resident at an Approved Premises, however, the probation practitioner will need to take steps to ensure that the individual is planning to continue living in the same area for a period of at least 15 months.

7. Complaints

- 7.1 Any complaint from an individual participating in a CoSA should be dealt with according to the Probation Service region's complaints policy and procedures. Complaints should be raised with the complaints team in the region who will then make contact with the Probation Service Regional Senior Contract Manager and CoSA contract manager.

Annex 1: Guidance for practitioners writing the referral.

Risk information:

Referrals should include brief details of the offence which sets out the relevant risk factors. These factors could include who the victim was (e.g. age, gender, relationship to the individual) and any particular victim vulnerabilities, evidence of grooming of the victim in the lead up to the offending and what those grooming behaviours were, how they accessed the victim etc. It does not need to include the specific details of the offences - do not replicate the 'Offence Analysis' from OASys in the referral form.

When considering the risk to victims, the probation practitioner must set out who the individual poses a risk to, for example 'adult females they enter into a relationship with' or 'teenage children, particularly boys', rather than details of specific victims. This must take into account victims of previous convictions (see below for guidance about spent convictions) and any other information which did not lead to a conviction. Details provided must not include any identifiable information about current or previous victims. It must also not be too specific, for example, if the victim of the index offence is 10 years old, the referral form should not state that the individual poses a risk of harm to 10-year-olds as this may influence the behaviour and indicators that the volunteers pay attention to during circles meetings. It is therefore important to give an indication of who the target victim group is. And the context in which they accessed the individual. This will be helpful in alerting members of a circle to potential risks; however, notice should be paid to the fact that the individual may reoffend in a variety of contexts and not only the one in which they have been convicted.

Information about licence conditions:

This should only include any conditions which are relevant to the safe and successful delivery of a circle. For example, if the individual has an exclusion zone near the local area, the Circles co-ordinator will need to know about this to make sure they do not set up any circle meetings in that area. Similarly, if they are prohibited from undertaking certain

activities, such as going to leisure centres or near children's play areas, the co-ordinator will need to be aware of this.

Do not include the entire list of licence conditions on the referral form. It must not include any conditions which the Circles co-ordinator and volunteers do not need to know for the circle to run effectively, for example if the individual has a polygraph testing licence condition or electronic monitoring.

Spent convictions:

In line with the Rehabilitation of Offenders Act 1974, probation practitioners must not include details of spent convictions on the referral form. For example, if an individual has a current conviction for Inciting a Child to Engage in Sexual Activity in 2022 and a previous conviction for Indecent Exposure in 2012 which is now spent, the probation practitioner cannot specify the offence of Indecent Exposure on the referral form.

That is not to say that spent conditions cannot be considered when accessing risk. For example, if the previous Indecent Exposure related to exposing themselves in a local park, the referral form could note 'xx is assessed as posing a high risk of sexual harm to children. This risk posed is to older children either online, or in places such as play parks.'

For guidance on how to identify if a conviction is spent, please refer to this page [Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/on-the-rehabilitation-of-offenders-act-1974-and-the-exceptions-order-1975)