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# Policy Handbook

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## Contributors

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## 1. Safeguarding Policy

This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers, placement students and anyone working on behalf of BF Adventure.

### The purpose of this policy

- To protect children and young people and adults who receive services from BF Adventure
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection.

BF Adventure believes that a child, young person or adult should never experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people and vulnerable adults and to keep them safe. We are committed to practise in a way that keeps them safe.

### Legal Framework

This policy acknowledges BF Adventure's duty of care to safeguard and promote the welfare of children, young people and vulnerable adults and its commitment to ensuring that organisational safeguarding practice reflects statutory responsibilities, best practice and government guidance, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offence Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- SEND code of practice: 0-25 years HM Government 2014
- Information sharing: HM Government 2015
- "Working Together to Safeguard Children"; HM Government 2015
- "The Prevent Duty Guidance for England and Wales"; HM Government 2015
- "Inspecting Safeguarding in early years, education and skills settings"; Ofsted, August 2015
- "Are They Safe"; Safe Network 2014
- "Safe Network Standards"; Safe Network 2013 (endorsed by the CloS LSCB in January 2012)

This policy should be read alongside our Policy Handbook, the appendices attached to this policy and Normal Operating Procedures. Specifically:

- Recruitment, induction and training
- Role of the designated Safeguarding Officer
- [Dealing with disclosure and concerns about a child or young person](#)
- [Managing allegations against staff and volunteers](#)

- [Safer recruitment](#)
- [On line safety](#)
- [Anti-bullying policy](#)
- [Complaints](#)
- [Whistleblowing](#)
- Health and safety
- Training supervision and support
- [Lone working policy](#)
- Quality assurance

## Equality Statement

BF Adventure recognises that the welfare and interests of the child is paramount in all circumstances, as enshrined in the Children Act 1989.

BF Adventure recognises that regardless of age, racial heritage, religious belief, disability, sexual orientation, identity or socio-economic background, all staff, volunteers, visitors, trustees and service users have a right to equal protection from all types of harm or abuse.

BF Adventure is committed to anti-discriminatory practice and recognises that some children, young people and adults, are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

## Commitment to Service Users

We will keep children, young people and vulnerable adults safe by:

- Valuing them, listening to and respecting them
- Appointing a Designated Safeguarding Officer (DSO) for children and young people, a deputy and a lead board member for safeguarding
- Implementing an effective on-line safety policy and related procedures
- Providing effective management for staff and volunteers through supervision, training and quality assurance measures
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Recording and storing information professionally and securely, and sharing information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we operate in line with our policy
- Ensuring that we have effective complaints and whistle blowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

Service users should feel supported to:

- have a positive and enjoyable experience at BF Adventure, in a safe and user centred environment
- be confident to speak to staff members if they have concerns about themselves or another person and are confident that their views will be listened to and responded to with appropriate action
- Sign up to the BF Adventure code of behaviour which recognises the mission and value base of the organisation
- Understand that BF Adventure is committed to working in partnership with children, young people, their parents, carers and other agencies to promote their welfare.

## Contact details

### Designated Safeguarding Officer/Single Point of Contact

Name: El Warren

Tel: 01326 340912

Email: [el.warren@bfadventure.org](mailto:el.warren@bfadventure.org)

### Deputy Safeguarding Officers

Name: Paul Cox

Email: [paul.cox@bfadventure.org](mailto:paul.cox@bfadventure.org)

Name: Rachael Stephens

Email: [Rachael.stephens@bfadventure.org](mailto:Rachael.stephens@bfadventure.org)

Name: Jeni Stephens

Email: [Jeni.Stephens@bfadventure.org](mailto:Jeni.Stephens@bfadventure.org)

### Trustee with responsibility for Safeguarding:

Bob Padbury

Email: [bob.padbury@bfadventure.org](mailto:bob.padbury@bfadventure.org)

## Policy and review

The policy will be reviewed annually, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by the Local Safeguarding Children Board
- as a result of any other significant change or event

Signed:



Name/Position: Charity Business Manager

## 2. Allergens and Dietary Requirement Policy

BF is committed to reducing the risk to staff, volunteers, customers and visitors with regard to the provision of food and the consumption of allergens in food which could lead to an allergic reaction.

The following foods are recognised as potentially harmful allergens to some:

- cereals containing gluten – wheat, rye, barley and oat
- crustaceans
- egg
- fish
- peanuts/nuts
- milk
- soya
- sesame
- celery
- mustard
- Sulphur dioxide/sulphate
- Lupin
- Molluscus
- Coconut

BF monitors five key factors towards the successful management of harmful allergens:

### 1. Supplier product information

Working closely with suppliers to enable up to date and clear labelling of all products that may contain potentially harmful allergens.

Any new products supplied are routinely checked for allergen information.

### 2. Good kitchen and service practice.

Working closely with the local EHO to ensure all current legislation is being adhered to.

### 3. Managing cross contamination

Maintaining rigid food hygiene standards throughout food handling areas.

Where allergenic ingredients are packaged openly/loosely, they are stored separately to reduce the risk of cross contamination.

Supplier questionnaires to check the allergenic status of ingredients are used particularly with new suppliers.

Physical segregation within the production area is sought at all times.

All food handlers employed are trained in all areas of good food hygiene practice.

BF operates a NO Nut Policy across its Group Food Preparation Areas (Community and Camp Kitchens) with particular focus upon all control measures upon occasions when clients with known allergies are upon site.

- BF Staff will not use nut products in any client related catering on site
- All Clients are encouraged not to bring Nut related products upon site
- Group Kitchens are designated No Nut areas and all clients are asked to not bring any nut related product into these areas
- Prior to any BF-led group catering (or client catering with a known Nut sensitive client) a full check of all food preparation areas will be conducted to ensure no nut items have been brought onsite by other users.

#### **4. Effective training**

Working with both the local EHO and the Food Standards Agency.

Catering Coordinator holds a level 3 food hygiene certificate.

All food handlers hold a basic Level 2 food hygiene certificate.

#### **5. Good communication**

Staff are trained to escalate any concerns a customer may have regarding food intolerance to a line manager if they are unsure of product content.

Where dishes contain potentially dangerous allergens, they are clearly labelled at point of service. This labelling is also carried through onto menus and labelling.

#### **Specific allergy and food intolerance product information:**

Nut allergy - Items known to contain nuts are avoided and if necessary (items which may be factory prepared in a nut risk environment) directly labelled or labelled on menus.

BF and their suppliers are unable to fully guarantee that all products do not contain nut derivatives, due to the potential of airborne contamination.

This policy is in line with the industry standard and following advice from the Food Standard Agency.

Lactose-Free Diet – Almond milk for drinks is available on request (if notified in advance). Lactose-free cheese sandwiches are available on request.

Gluten-Free Diet - Gluten-free bread is available with any sandwich filling on request.

Gluten free biscuits and cakes and biscuits are available on request.

Low-Fat Diet - Semi-skimmed milk is used as standard for all hot drinks. Skimmed milk is available on request.

Vegetarian/vegan diets - Items suitable for a vegetarian or vegan diet are included as standard throughout our menus and labelled where necessary

Last update: Sunday, 11 February 2018

Updated by: Adrian Richards

To be reviewed by: Adrian Richards

To be reviewed by: 01-03-2019



### 3. Anti Bullying Policy

#### Aim

BF Adventure aims to ensure that all service users, staff, Trustees, volunteers and visitors feel safe and secure and are free from bullying behaviour by others. BF Adventure is committed to supporting those who feel victimised and to work with them to address the issue. BF Adventure is committed to working with perpetrators of bullying behaviour to support them to understand the impact of their behaviour on themselves and others and to enable them to change accordingly.

#### **BF Adventure will:**

Promote a culture of tolerance towards diversity and challenge behaviours and comments that potentially cause harm to others, with particular reference to the nine protected characteristics.

Ensure all service users, staff, volunteers and Trustees are committed to the aims and mission of the organisation and are vigilant to the possible indications that a person is a victim of bullying.

Ensure all service users, staff, volunteers and Trustees are informed about, and understand to an appropriate level, BF Adventure's Confidentiality Policy, Whistle Blowing Policy and Complaints Procedures

Ensure that all members of the BF Adventure community have the strength to report incidences of bullying and have the knowledge about the systems in place to do this.

Provide on-going preventative education to service users to enable them to build emotional resilience and determination and to lessen the impact of harm caused through bullying behaviours.

Support and educate service users to protect themselves from online risks, to know how to access further support and how to report incidents that happen online (through CEOP).

Support service users to access specialist services to meet their identified needs.

#### Definition of Bullying

Bullying is a form of aggressive behaviour which is usually hurtful and deliberate and can be persistent. Underlying most bullying behaviour is an abuse of power and a desire to dominate through intimidation. The repeated nature of incidences of bullying have a cumulative impact on the victim and can lead to serious implications.

#### Forms of bullying

Bullying can take many forms and include:

Physical bullying - hitting, stealing/damaging belongings

Verbal bullying- insults, repeated teasing, name calling, racist, sexist or homophobic comments

Indirect bullying - deliberately excluding people from social groups, spreading rumours

Online bullying - use of technology (eg text/sxts, phone calls, instant messaging, email, social networks) to repeatedly make threatening, abusive, embarrassing or intimidating comments or to use multi-media (film, photos) to the same affect.

## Reporting incidents of bullying

BF Adventure will ensure that all reports of bullying are dealt with efficiently, effectively and in a manner that meets the needs of the individual. All incidents will be recorded in an incident report and stored securely.

In incidences where staff, volunteers or Trustees feel that they are being bullied the Harassment Procedures will be followed (see page 21 of the Policy Handbook).

Where it is a service user who feels bullied by another service user, they will be encouraged to speak to a trusted member of staff and/or the Programme Co-ordinator/Manager in a confidential space.

The incident will be discussed with the perpetrator and a strategy for a change in behaviour will be agreed. In extreme situations, where the perpetrator continues to demonstrate bullying behaviour despite ongoing interventions from BF staff, they could have their service revoked.

Last update: 05/01/2018  
Updated by: El Warren  
Policy Owner: El Warren  
To be reviewed by: January 2019

Version 1 07/04/2016 El Warren

## 4. Attendance of Core Service Users - Skills for Life

This policy covers how BF Adventure will monitor the attendance of Core service users

This section of the policy covers learners who have been referred to the Skills for Life (S4L) programme.

A daily register of S4L attendance will be maintained by BF staff and overseen by the Education Programme Manager.

Any unauthorised absences will be marked against the learner's name in the attendance register and be reported to the referring agency at the earliest opportunity. A series of unauthorised absences may constitute a 'break in learning' and require the individual to restart the programme of activity, through discussion with the referring agency.

### Authorised absence

If a learner's absence is reported in advance of planned attendance it will be recorded as authorised. If a learner contacts BF Adventure on the morning of expected attendance and reports an excusable reason for the absence it will also be recorded as authorised. Absences of an authorised nature will be monitored and authorised absences cumulating to 10% or more of a programme of activity will trigger further investigation between all parties.

### Unauthorised absence

If the learner's absence is not reported in advance it will be considered as unauthorised. Two consecutive incidents of unauthorised absence will trigger further investigation between all parties. Ongoing and unresolved unauthorised absences may be considered to constitute a 'break in learning'.

## Attendance of Core Service Users - Skills for Work

This policy covers how BF Adventure will monitor the attendance of Core service users who have been referred to the Skills for Work programme.

BF Adventure will inform learners of this policy as part of the induction to the programme of activity and provide individuals with a landline and a mobile number for reporting absences. A daily register of attendance will be maintained by BF staff.

Any unauthorised absences will be marked against the learner's name in the attendance register and be reported to the referring agency at the earliest opportunity. A series of unauthorised absences may constitute a 'break in learning' and require the individual to restart the programme of activity, through discussion with the referring agency.

### Authorised absence

If a learner contacts BF Adventure in advance or on the morning of expected attendance and reports an excusable reason for the absence it will also be recorded as authorised. Absences of an authorised nature will be monitored and authorised absences cumulating to 10% or more of a programme of activity will trigger further investigation between all parties.

### Unauthorised absence

If the learner's absence is not reported in advance it will be considered as unauthorised. Two consecutive incidents of unauthorised absence will trigger further investigation between all parties. Ongoing and unresolved unauthorised absences may be considered to constitute a 'break in learning'.

### Break in learning

If a learner misses a significant element of the programme of activity, whether authorised or unauthorised, this may be considered as a 'break in learning'. Whether a 'break in learning' has occurred will be determined by BF Adventure, the learner and also the referring agency where appropriate. If it is deemed a 'break in learning' has occurred the likely outcome will be the provision of Information, Advice and Guidance and if suitable a re-referral to BF Adventure to begin the programme of activity again.

Last update:	05/01/2018
Updated by:	El Warren
Policy Owner:	El Warren
To be reviewed by:	January 2019

## 5. Complaints, Compliments and Suggestions Policy

BF Adventure is committed to delivering a quality service. In order to continually improve and develop our service we want to hear from our customers and service users regarding complaints, compliments and suggestions.

To ensure staff, customers and service users know where to direct complaints, compliments and suggestions we follow these key points:

- BFA aims to provide staff, volunteers, service users and customers with the best possible experience and actively seeks feedback
- BFA seeks to continually develop its service and is aware that complaints, compliments and suggestions aid this development
- Staff complete feedback sheets with service users
- Customers complete feedback forms at the end of session / residential
- Team meetings, supervisions and staff questionnaires provide opportunities for staff and volunteer team to raise complaints, compliments and suggestions

### Informal Complaints

Any comments made verbally, via social networking or in writing that suggest dissatisfaction will be dealt with as an informal complaint.

The member of staff receiving the informal complaint will react with professionalism and ensure they understand the nature of the complaint. An appropriate solution that reflects the nature of the complaint can be sought. The member of staff dealing with the complaint must make it known to the Duty Manager.

If a solution acceptable to both parties cannot be found then the customer / client will be advised to make a formal complaint.

### Formal Complaint

A formal complaint must be presented in writing to Adrian Richards, CEO, BF Adventure, Halvasso, Longdowns, Penryn, Cornwall TR10 9BX.

*Mainstream/Commercial Customers:*

Complaints will be responded to within 5 working days.

*Service User/Core Charity Client:*

The document will be signed by the complainant and the Duty manager as an accurate statement of the complaint.

The complaint will be responded to within 5 working days to confirm receipt of the complaint, as well as the process and the timescales involved.

The complainant may be invited to interview (at a time and location of their convenience) to clarify details regarding the complaint, they will be able to bring a representative to this interview for support purposes if required.

If the complaint involves the behaviour or actions of a BFA team member that team member will be informed of the complaint against them as soon as possible. Depending upon the nature of the complaint and potential disciplinary procedures the team member may be suspended for the duration of the investigation. The team member will be kept informed throughout the process.

Upon completion of the investigation the complainant will be notified in writing of the outcome.

### Appeal / Escalation

If the complainant is not satisfied they may appeal in writing to the Chair of Trustees within 7 days (write to Chair of Trustees, c/o BF Adventure as above and mark letter Private and Confidential). The matter will then be investigated by a panel of professionals and / or board members who are independent to the initial process.

The appeal panel will consider the appeal and surrounding evidence and the decision of the panel will be viewed as final.

If the complaint is regarding a safeguarding matter that has not been dealt with by BF Adventure to your satisfaction and you still have concerns for the safety or welfare of a young person or vulnerable adult you can direct your concern to:

MARU 0300 1231 116 or email [SingleReferralUnit@cornwall.gcsx.gov.uk](mailto:SingleReferralUnit@cornwall.gcsx.gov.uk) (children, young people, vulnerable adults)

LADO (Local Area Designated Officer) 01872 254549 (for concerns around the conduct of staff or volunteers)

For any complaints not handled to your satisfaction regarding issues of Health and Safety please contact:

Health and Safety Executive 01752 276300

### Monitoring

BFA will record all formal complaints and review annually to assess and trends or training issues that may arise. This monitoring process may also result in the Complaints, Compliments and Suggestions Policy being reviewed.

### Compliments

Compliments, positive news and thank you messages to be shared with the staff team at appropriate morning briefings, as well as other suitable opportunities.

Compliments may also be shared via social networking if the customer / service user is agreeable.

Compliments will be recorded in the shared marketing file with reference to the detail of the customer / service user and referenced as may be required for project evidence and funding application.

### Suggestions

Any customer or service user wanting to make a suggestion to improve the service will be supported by their Instructor / Programme Manager to complete a suggestion form.

Suggestions forms are to be submitted to Adrian Richards, CEO and will be presented at fortnightly strategic team meetings for consideration by managers.

Parties making suggestions will then be informed of outcome of suggestion in writing within 5 days of the strategic team meeting.

### First Aid training specific complaints, escalations and appeals

#### 1. Escalating and complaint

The candidate has the right to escalate any complaint to ITC then Ofqual/SQA and then to the Scottish Public Services Ombudsman (SPSO) (for SCQF qualifications only e.g. Outdoor First Aid.)

#### 2. Appeal against a decision

The candidate has the right to raise their appeal to ITC and then Ofqual for QCF qualifications or SQA for SCQF qualifications

Last 7<sup>th</sup> Feb 2018 (ITC first aid addition by TB 15/3/16)

Updated by: Adrian Richards

Policy Owner: Adrian Richards

To be reviewed by: Feb 2019





## 6. Conflicts of interest

### 1 Introduction

1.1 This policy applies to all BFA staff, trainers and assessors who are involved in the day to running, training and assessing first aid training.

All those involved with BFA delivery and assessment of ITC qualifications have an obligation to act in a way that does not lead to any conflict of interest.

1.2 Definition: A conflict of interest may occur when the personal or business interests of an individual conflicts with their professional duties and responsibilities. Such conflicts could result in damage to the integrity and reputation of the ITC Awards BFA deliver or compromise the validity of a learner assessment and the award.

### 2 This policy:

- Provides a mechanism to protect the course candidates and the integrity of ITC Awards by ensuring that reasonable steps are taken to mitigate any potential or identified conflicts of interest.
- Identifies the main areas where a conflict of interest could occur in order to minimise and eliminate adverse effects
- Complies with regulatory bodies requirements and policies

### 3.Examples of Conflicts of Interest.

The following list is not exhaustive but common examples.

3.1 Direct or indirect financial gain as a result of actions or involvement;

3.2 Direct or indirect benefits such as employment, gifts, hospitality;

3.3 Reciprocal arrangements which compromise the ability to make reliable and professional judgements;

3.4 Connections to family relationships and/or close friendships with learners who are being assessed

3.5 Connections with family members and/or close friendships for training and external assessing of candidates

3.6 Trainers with family or close friendship connections who internally verify each other's courses/assessment decisions

3.7 Assessment judgements on behalf of a learner who is their partner or close friend.

## 4 Declaring a Conflict of Interest

BFA will take all reasonable steps to ensure a Conflict of Interest does not arise however if this is not possible the following steps will be taken:

4.1 Declarations of actual or potential Conflicts of Interest must be made in writing or by telephone (followed up with written confirmation) to BFA as soon as they arise.

4.2 BFA will inform the awarding body of such conflict prior to any training activity being undertaken and seek advice.

4.3 BFA will log all Conflicts of Interest and make the log available to the awarding body and/or regulators as requested (ITC first aid file).

4.4 Failure to inform BFA or the awarding body aware of actual or potential Conflicts of Interest may result in sanctions being applied

4.5 BFA Director will make an annual declaration regarding the status of BFA Conflict of Interests (ITC first aid file) .

This policy to be reviewed and confirmed by each member of BFA staff. A signed copy should be returned to BFA.

### Declaration:

I have read and understood the contents of the BFA Conflicts of Interest policy and agree to abide by this policy.

BFA Staff Name	BFA Role ie Trainer/Assessor	Date
Paul Lakeman		

Last                      January 2018

Updated by:              Tony Baker

Policy Owner:            Tony Baker

To be reviewed by:      January 2019

## 7. Confidentiality Policy

### Policy Aim

This policy applies to all staff members, trustees and volunteers at BF Adventure. It outlines BF Adventure's confidentiality and information sharing policy and procedures for children, young people and service users. It should be read in conjunction with the Safeguarding Policy and Data Protection Policy. BF Adventure recognises that building trusting relationships with professionals is important for vulnerable service users and sharing information without the knowledge of that service user can damage trust.

### Confidentiality Statement

Personal information shared by young people with their Instructor, Co-ordinator or equivalent will normally remain confidential within the organisation. This means that information provided by young people will not be shared with external agencies without the consent of the child, young person or parent. BF Adventure is committed to safeguarding children, young people and adults and information will be shared in line with the legal guidelines below.

### Legal guidelines

The Information Sharing Advice for Practitioners (HM Government March 2015) states that "Information sharing is vital to safeguarding and promoting the welfare of children and young people. A key factor identified in many serious case reviews (SCRs) has been a failure by practitioners to record information, to share it, to understand its significance and then take appropriate action."

It is therefore essential that workers consider the benefits of sharing information where it is considered that the welfare of a child or young person is at risk, or where the service to that child or young person could be improved. The aforementioned document contains a flow diagram that must be used to inform decision making regarding information sharing, and decisions should be checked through your line manager.

### Information sharing

Quality assurance processes require notes or case files on individuals to be viewed as part of audit or official enquiry (for example, child protection procedures). This must be made clear to young people wishing to share confidential information with a BF Adventure representative and in instances where they object but it's deemed in the interest of the young person to proceed, this decision must be recorded.

Information will be shared with appropriate services, without the need to gain consent, when:

- there is a significant threat to life
- where potential or actual serious criminal offences are involved
- a coroner's inquest, tribunal or a court require information as evidence
- the young person is currently being abused, including sexual or other abuse
- the young person suspects or fears a sibling or other child may be at risk of abuse

- the young person is a perpetrator of abuse
- the young person alleges or suspects another person is perpetrating abuse
- the young person alleges or suspects a professional carer is perpetrating abuse (youth worker, social worker, probation officer, residential care worker, etc)
- the young person is felt to be of serious risk of self-harming
- the young person is in need of urgent medical treatment
- the young person is felt to be a serious risk of causing harm to others
- the young person is perceived to be at risk of serious harm through lifestyle choices or other potentially harmful courses of action

### Procedures

- Service users will be informed at the earliest opportunity and always at the outset of a meeting, interview or IAG session that BF Adventure cannot offer absolute confidentiality, in line with the law and Safeguarding procedures.
- Posters will be displayed in prominent places explaining the confidentiality policy
- Service users will be offered an opportunity to discuss their understanding of confidentiality and the reasons why information they provide may be shared with or without their consent.
- If a member of staff receives a subpoena from a court to give evidence, they have a duty to respond.
- In the event of a disclosure relating to a child protection issue then BF Adventure Safeguarding and Child Protection Procedures will be followed.
- BF Adventure staff will always endeavour to gain consent from the service user before sharing information. In some situations, including where the risk of harm is deemed high or the service user cannot be contacted, this may not be possible.

Subject to the above, no personal information (unless adequately anonymised) about any client of BF Adventure is to be released to any external person or organisation.

Last update: 05/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: January 2019

## 8. Data Protection Policy

### 1. Purpose

1.1 The Data Protection Act 1998 ('the Act') has two principal purposes:

- i. to regulate the use by those (known as data controllers) who obtain, hold and process personal data on living individuals, of those personal data; and
- ii. to provide certain rights (for example, of accessing personal information) to those living individuals (known as data subjects) whose data is held.

1.2 The cornerstones of the Act are the eight data protection principles, which prescribe:

- i. guidelines on the information life-cycle (creation/acquisition; holding; processing; querying, amending, editing; disclosure or transfer to third parties; and destruction ('the life-cycle');
- ii. the purpose for which data are gathered and held; and
- iii. enshrine rights for data subjects.

The Act applies to BF Adventure, the Data Controller for the purposes of the Act, and to anyone who holds personal information in a structured way so that retrieval is easy. BFA is fully committed to abiding, not only by the letter, but also by the spirit of the Act, and, in particular, is committed to the observation, wherever possible, of the highest standard of conduct mandated by the Act. This policy has been written to acquaint staff with their duties under the Act and to set out the standards expected by BFA in relation to processing of personal data and safeguarding individuals' rights and freedoms.

### 2. Staff duties

Employees of BFA are expected to:

- i. acquaint themselves with, and abide by, the Data Protection Principles;
- ii. read and understand this policy document, the staff confidentiality agreement and the guidance set out in appendix C;
- iii. understand how to conform to the standard expected at any stage in the life-cycle (see section 4 of this policy);
- iv. understand how to conform to the standard expected in relation to safeguarding data subjects' rights (e.g. the right to inspect personal data) under the Act;
- v. understand what is meant by 'sensitive personal data', and know how to handle such data; and
- vi. contact the Data Protection Officer if in any doubt, and not to jeopardise individuals' rights or risk a contravention of the Act.

### 3. The Data Protection Principles

The Data Protection Principles, in summary, are:

- i. Personal data shall be processed fairly and lawfully.
- ii. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- iii. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- iv. Personal data shall be accurate and, where necessary, kept up to date.

- v. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- vi. Personal data shall be processed in accordance with the rights of data subjects under this Act.
- vii. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- viii. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## 4. Best-practice guidelines for the life-cycle process

### 4.1 Acquisition of personal data (see Principles 1, 2, 3)

Those wishing to obtain personal data must comply with guidelines issued from time to time by the Data Protection Officer and, in particular, should tell data subjects the purpose(s) for which they are gathering the data, obtain their explicit consent, and inform them that BF Adventure will be the data controller for the purposes of the Act and the identities of any other persons to whom the data may be disclosed. If sensitive personal data are being collected, explicit consent is not only best practice, it is mandatory. No more data should be collected than is necessary for the purpose(s) declared.

### 4.2 Holding/safeguarding/disposal of personal data (see Principles 4, 5 and 7)

Data should not be held for longer than is necessary. Guidance for length of retention is set in law, or given in section 4.5 of this policy. Personal data should be reviewed periodically to check that they are accurate and up to date and to determine whether retention is still necessary.

Adequate measures should be taken to safeguard data so as to prevent loss, destruction or unauthorised disclosure. The more sensitive the data, the greater the measures that need to be taken. This includes the protection of physical data through the use of locked storage, restricted access and a culture of respect for the information we hold, it also includes the protection of electronic data through restricting access to data and protecting data using passwords and encryption (further details of this can be found in the ICT policy).

### 4.3 Processing of personal data (see Principles 1, 2)

In this particular context, 'processing' is used in the narrow sense of editing, amending or querying data. In the context of the Act as a whole, 'processing' is very widely defined to include acquisition, passive holding, disclosure and deletion.

Personal data must not be processed except for the purpose(s) for which they were obtained or for a similar, analogous purpose. If the new purpose is very different, the data subject's consent must be obtained.

### 4.4 Disclosures and transfers of personal data (see Principles 1, 2, 7, 8)

#### 4.4.1 Disclosures

BF Adventure's policy is to exercise its discretion under the Act to protect the confidentiality of those whose personal data it holds.

- i. Employees of BFA may not disclose any information about clients or other employees, including information as to whether or not any person is or has been a client or employee of

the BFA unless they are clear that they have been given authority by BFA to do so. Particular care should be taken in relation to any posting of personal information on the internet.

- ii. No employee of BFA may provide references to prospective employers or landlords or others without the consent of the individual concerned. It is therefore essential that where BFA is given as a referee, the subject of the reference should provide BFA with the necessary notification and consent.
- iii. No employee may disclose personal data to the police or any other public authority unless that disclosure has been authorised by BFA's Data Protection Officer or Safeguarding Officers.
- iv. Employees of BFA may not use personal data for marketing (including photographs) without permission of the individuals, or the body/person with responsibility for those individuals (for example the school or parents of Clients).

#### 4.4.2 Transfers

Personal data should not be transferred outside BFA, and in particular not to a country outside the EEA

- i. except with the data subject's consent; or
- ii. in accordance with a contractual data sharing agreement;
- iii. unless that country's data protection laws provide an adequate level of protection; or
- iv. adequate safeguards have been put in place in consultation with the Data Protection officer; or
- v. in consultation with the Data Protection Officer or Safeguarding Officer where it is established that there is a legal obligation to disclose, or that the Client may be at risk by non-disclosure (see the Confidentiality Policy).

#### 4.5 Destruction of personal data (see Principles 5 and 7)

Personal data must not be held for longer than necessary; and when such data have been earmarked for destruction, appropriate measures must be taken to ensure that the data cannot be reconstructed and processed by third parties.

- Staff records - 25 years (in line with insurance guidelines for safeguarding young people)
- Client records - 5 years

## 5. Data subjects' rights of access

BFA is fully committed to facilitating access by data subjects ('applicants') to their personal data, while bearing in mind the need to protect other individuals' rights of privacy.

All applicants will be expected to request access in writing or via email and will need to supply proof of identity before any data can be released. If a request is made by a third party BFA must be given adequate proof that the data subject has given authority to the third party for disclosure.

The fee for a subject access request is £10. All subject access requests are to be forwarded to the Data Protection Officer, if they have not already been addressed to him or her.

## 6. Review

This policy will be reviewed annually to take account of changes in the law and guidance issued by the Information Commissioner.

## 7. Data protection contacts

For general enquiries about the BFA's Data Protection Policy and for formal subject access requests under the Act:

Data Protection Officer

BF Adventure  
Goodygrane Activity Centre  
Halvasso, Longdowns  
Penryn  
Cornwall  
TR10 9BX

Telephone: (01326) 340912 E-mail: [enquiries@bfadventure.org](mailto:enquiries@bfadventure.org)

## 8. Disciplinary consequences of this policy

Unlawful obtaining or disclosure of personal data (including the transfer of personal data outside the EEA in contravention of paragraph 4.4.2 above) or any other breach of section 55 of the Data Protection Act 1998 by staff, trustees or volunteers will be treated seriously by BFA and may lead to disciplinary action up to and including dismissal or suspension.

Last update: 13/02/2017

Updated by: Simon Beckham

Policy Simon Beckham

To be reviewed by: December 2019



## 9. Staff Dogs on Site:

The aim is to ensure consistent and fair treatment for all in the organisation.

1. Dogs are only permitted upon site if for use with a client (pre-arranged) or when site is closed to any form of client usage.
2. For use with a client staff member MUST discuss with programme manager and must obtain prior written Authorisation
3. Presence must be logged in site Log (Time in & Out) & Noted upon dairy page to say: *'permission for (staff initials) dog to be on site'*
4. The specific risks associated must be discussed with the appropriate manager and agreed actions followed.
5. Staff may only engage in activities within their normal remittance that they are authorised to run with clients
6. Staff must not bring pets on site for personal reasons in work time.
7. Staff may bring dogs upon site if no clients are present, presence must be logged in site log
8. Dog must be kept fully under control at ALL times
9. Public Camping groups can request to bring dogs on site, the following conditions apply:
  - Requests must be made in writing / email before arrival
  - Dogs must be kept under control and on a lead when in public camping areas
  - Dogs are only allowed on the campsite (the area above the gate by the Adventure Barn)
  - Dogs are not allowed in the kitchen or dining areas
  - All dog mess must be cleaned up, double bagged and disposed of in site bins
  - Other people boundaries must be respected
  - BFA reserves the right to request the immediate removal of any problem causing dogs immediately from the site (at our discretion) No refund for reduced length stays would be due

**ALL DOG MESS must be cleaned up fully and REMOVED from site**

Last Update	January 2018
Updated by	TonyTony
Policy owner:	TonyTony
To be reviewed by:	January 2019

## 10. Duty Manager

The aim of this policy is to set in place a clear representation of the roles and responsibilities of the Duty Manager. Due to the nature of the charity and the risks associated with operating a busy outdoor pursuits centre the policy is a guide and not the exhaustive list and people undertaken the role need to be dynamic and authoritative.

The aims of the Duty Manager

1. To respond and deal with non-planned events that occur during a typical working day at BFA. This historically has included but not limited to the following:
  - a. Livestock on site
  - b. Accidents
  - c. Incident management
  - d. Unauthorised visitors
  - e. Vehicle breakdowns
  - f. Responding to staff operating off site who are not back in time for their ETA
  - g. RPI events
  - h. Safeguarding - in line with training and BF procedures
2. To coordinate and advise staff and coordinators where appropriate and support in decision making processes to ensure smooth running of services and facilities. This may include:
  - a. Assigning staff to jobs in the absence of direct line managers
  - b. Suggesting and supporting cross departmental changes when services do not show or staff are ill
  - c. Responding to customer or staff enquires if appropriate line managers are not available
  - d. Responding to incidents and follow any relevant BF Procedures including contacting relevant stake holders for young people and groups, completing RIDDOR or safeguarding forms and processes (along with relevant level of training), reporting to the CEO, Centre manager and or Trustees in major events.

The following procedures and practices need to be followed as part of the Duty Managers daily responsibilities:

3. Ensure the plan for the day has been proofed before the morning - this is to head off any potential issues before they occur. This is to include:
  - a. Obtaining the weather report- check against planned activities and work with staff to alter accordingly
  - b. Checking all planned resources
  - c. Briefing the staff team at 0900- share and check understanding and trouble shoot with the relevant staff and coordinators as appropriate
4. Be contactable on the Duty Manager radio for the day or ensure that another Duty Manager has the radio and is able to cover- this allows staff instant access to the Duty Manager should the need arise
5. Carry a personal mobile phone - this will act as a secondary mean of contact should for any reason the radio is not able to summon support
6. Plan their normal duties so they are able to support staff should an incident arise - Things like meetings and training should be set up in such a way that the DM can instantly drop what they are doing and support

Other factors:

7. Staff in normal situations should be communicating with line managers / coordinators using appropriate radio call signs such as "BF Office" or "BF <<NAME>>". The DM is not bound to respond to these communications.
8. Staff needing assistance or advice beyond line management / coordinators should make their intentions clearly know and use the radio to ask for the "BF Duty Manager, BF Duty Manager, BF Duty Manager". In this instance, the Duty manager needs to respond.
9. If no response is provided then the office, the staff member, any off duty Duty Managers or coordination staff should respond and take efforts to contact the Duty Manager on a mobile.
10. The Duty Manager may choose to deal with tasks in several ways:
  - a. They can choose to delegate to relevant coordinators- this may be to benefit the young person, keeping information in a small circle of people as possible
  - b. They may choose directly deal the incident and take on lead responsibility- this maybe be a large or complex incident and keeping a single point of leadership adds clarity for all
  - c. They may choose to delegate to the CM, the CEO or Trustees- if the event significant and have complex repercussions then the SMT could be best to respond
  - d. They may choose to postpone the management of an incident- this could be because the relevant manager is away and can better deal with the incident when they return
11. The DM may respond to sessional observations and hold staff to account in breaches of NOP, standards of operation and general behaviour in accordance with the BF Adventure staff hand book. In all cases, this should be fed back to the line manager and in cases requiring disciplinary action a member of the SMT should be consulted before any action is taken.
12. Qualifications and experience
  - a. A Duty Manager should know and understand how BF Adventure operates. Usually staff being Duty Manager should have worked at BF for 1 year at a level 4 or above capacity or have extensive relevant experience that can transfer across
  - b. A Duty Manager should be able to support in a wide spectrum of incidents including first aid, safeguarding, de-escalation strategies and RPI.
  - c. A Duty Manager should have at a minimum a very good understanding of activity safety and the workings of the NOP

Last Update	January 2018
Updated by	Tony Baker
Policy Owner	Tony Baker
To be reviewed by:	January 2019

## 11. Environmental Policy

BF Adventure is committed to minimising the impact of its activities on the environment.

The key points of our strategy to achieve this are:

1. Encourage car sharing where possible. We recognise that we are a remote site not accessible by public transport, but where possible we operate central mini bus pick ups of service users and support staff to share journeys.
2. Source local produce where possible and sustain minimum stock levels to ensure limited deliveries to our site.
3. Ensure stationery, office and environmentally friendly cleaning supplies are delivered in bulk orders to minimise supplier journeys to our site.
4. Minimise waste by evaluating operations and ensuring they are as efficient as possible.
5. Actively promote recycling both internally and amongst our customers.
6. Raise awareness of environmental impacts of our organization and encourage staff and service users to contribute to improved efficiencies.
7. Raise awareness amongst our client group of relevant environmental issues and encourage them to adopt environmentally friendly practices, such as recycling which they can apply outside of BF Adventure.
8. Strive to become carbon neutral for our utility requirements, we currently source water on site from a borehole, and generate up to 10KW via Solar PV and 10KW from a wind turbine, we aim to seek efficiencies and reduce usage to match our generation potential.
9. Maintain wildlife areas on site as well as providing nesting boxes for bats and birds located in appropriate sites.
10. Reinforce message to team and service users to turn off appliances and lights when not in use.
11. Meet relevant environmental legislation.
12. Regularly monitor and update environmental strategy.

### Use of pesticides

BF Adventure is keen to support the and promote a healthy environment for all its uses, staff and any form of wildlife and understand that due to the varied habitats and the size and of BF Adventure, that we will be host to rare and special species. With this in mind, we have a set of guidelines that we are committed to follow:

**Bees and rare insects-** BF will always cooperate with local organisations to promote species as far as practical. Where species are rare or have special interest and are potentially at risk of causing harm to its staff or visitors then a safe removal from the site will be arranged. The use of pesticides to control the size of the species is not permissible at any time unless recommended by outside professionals.

**Vermin (rats and mice)-** Due to the serious nature of diseases being transmitted from rats, BF Adventure will use poison to control the population of rats around office, accommodation and catering areas.

Last update:	January 2018
Updated by:	Tony Baker
Policy Owner:	Tony Baker
To be reviewed by:	January 2019

## 12. Equal Opportunities Policy and Discrimination

The Company is an equal opportunities employer and is committed to opposing all forms of discrimination, victimisation or harassment in the workplace. We **will not tolerate** discrimination, victimisation or harassment based upon the protected grounds set out below.

### EQUAL OPPORTUNITIES POLICY STATEMENT

We will not tolerate discrimination on any grounds and we operate an active equal opportunity policy. However, we cannot operate to stamp out discrimination unless we are made aware that this is happening. The equal opportunities policy will apply at all stages from recruitment, throughout employment to issues of termination of employment and in certain circumstances after your employment has finished. In particular please note:

We will not discriminate in deciding with whom to deal with or in the provision of services or in the selection, recruitment and treatment of staff;

All recruitment procedures followed will be on the basis of fair and objectively justified criteria that do not apply any requirements or conditions that are not necessary for the needs of the post or the business. Where job applicants have a disability the position of the Applicant will be reviewed and all possible steps will be taken to ensure that the Applicant does not suffer from any disadvantage in the recruitment process.

Throughout your employment you are expected to conduct yourself in a manner that is not discriminatory and the Company will take all possible steps to ensure that equal opportunity is maintained.

The approach taken to marketing and to the strategies adopted for providing services to clients will be compatible with this policy.

### The policy below applies to all employees.

The aim of this policy is that all members of staff know that they are able to work in an environment that is free from discrimination, victimisation and harassment and you are able to achieve your full potential in your job. Discrimination, harassment or victimisation will be regarded most seriously and will be treated as gross misconduct under the Company's Disciplinary Procedure. The Company will make decisions without reference to discriminatory criteria. All members of staff must be aware of this equal opportunities policy and should abide by its terms at all times.

### Monitoring

It is the responsibility of the Head of HR to ensure that all aspects of this policy are kept under review and are operated throughout the organisation.

### The Protected Characteristics

The Company will not tolerate discrimination, harassment or victimisation based upon gender, race, disability, religion, sexual orientation, age, marriage, civil partnership, pregnancy, maternity, gender reassignment.

Race includes colour, nationality, ethnic or national origin.

For this purpose, a person is defined as disabled if they have a physical or mental impairment that has a substantial and long-term adverse effect on his/her ability to carry out normal day-to-day activities.

Religion includes religious beliefs or similar philosophical beliefs. This protection extends to perceived as well as actual religion or belief and discrimination by association. The protection also extends to discrimination by persons of a religious belief towards a non-believer.

Sexual orientation includes orientation towards persons of the same sex (lesbians and gay people), the opposite sex (heterosexuals) and the same and opposite sex (bisexuals).

## The Types of Discrimination

In a number of areas, the law protects employees and discriminatory conduct or omissions are set out by Government legislation. There are specific concepts of discrimination, which make it clear what is unlawful. These are:

Direct Discrimination;

Discrimination by Association;

Perception Discrimination;

Indirect Discrimination;

Harassment;

Third Party Harassment;

### **Victimisation.**

Whilst these concepts may appear technical it is of importance since we may incur liability if you, in the scope of the duties entrusted to you, act in a way that is discriminatory or is harassing or victimising a person or a particular group of people.

### **Direct Discrimination**

This is where an individual is treated less favourably than another because they have a protected characteristic. It is direct discrimination as you would not have treated a person who did not possess that characteristic in the same way. An example would be promoting a man to a supervisory job when a woman is apparently better suited or preventing a person from receiving job training when others without that characteristic are allowed to do it.

### **Discrimination by Association**

Discrimination by association is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

### **Perception Discrimination**

Perception discrimination is direct discrimination against an individual because others think they possess a protected characteristic regardless of whether or not the person actually does possess that characteristic.

### **Indirect Discrimination**

Indirect discrimination occurs when a condition, rule, policy or practice is applied which puts a person at a particular disadvantage when compared to other persons. If this condition, rule, policy or practice has a disproportionate effect on a person or a particular group of people it will be indirect discrimination. An example is if a dress code does not allow employees to wear hats or scarves in the office it would be indirectly discriminating against Sikh men or Muslim women who wear turbans or hijabs.

Indirect discrimination can only be justified if the condition, rule, policy or practice is a proportionate means of achieving a legitimate aim. Circumstances where this will apply will be very rare. If you think that any discrimination could be justified you must check with your Line Manager before any steps are taken. Failure to do so may result in disciplinary action.

### **Harassment**

You would be submitting another person to harassment if you engage in unwanted conduct relating to a relevant protected characteristic which has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading or offensive environment for that person. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Harassment can also be behaviour that an individual finds offensive even if it is not directed at them and the complainant need not possess the relevant characteristic themselves.

Employees are also protected from harassment because of perception and association.

The Company does not tolerate any form of harassment, whether it be based upon any of the protected characteristics above or simply on grounds of personality. If you feel that you are the victim of harassment you should follow the provisions of the harassment policy set out below. This explains the steps that the Company will take in relation to complaints of harassment.

Please note that we will regard harassment as including any of the following. This is not an exhaustive list:

Sexual or racial banter or banter related to disability, religious beliefs or sexual orientation. This should be avoided at all times;

The display of any material that has sexual or racist connotation or is related to disability, religious beliefs or sexual orientation. This includes posters, post cards etc;

Verbal or non-verbal conduct or other behaviour that is directed to someone because of their disability (or a protected characteristic) and which could affect the dignity of the individual in the workplace. By way of example: comments about an individual's ability to carry out the job because of disability may amount to harassment.

It should be noted that any of the above committed outside the workplace or outside working hours will be regarded by the Company as harassment if it affects the working environment. A single act or incident can amount to harassment.

### **Third Party Harassment**

Third party harassment is where an employee is harassed and the harassment is related to a protected characteristic, by people (third-parties) who are not employees of the organisation, for example external trainers, staff contracted by BF Adventure or visitors to BF Adventure. BF Adventure are liable if the harassment has occurred on at least two previous occasions, we were aware that it has taken place and have not taken reasonable steps to prevent it from happening again.



**Victimisation**

This is treating a person less favourably because he or she has made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. The Company will not tolerate victimisation.

**HARASSMENT PROCEDURE****Stage 1: Informal Procedures**

In the first instance, the recipient of conduct that is considered by the employee to amount to harassment may seek to resolve the complaint on an informal basis. This may involve three stages:

If you consider that you are the recipient of such conduct you may prefer to resolve the matter by speaking to the individual concerned and pointing out that the conduct is not acceptable because it is unwanted and is interfering with the working environment. This is acceptable to the Company but you should not feel that this step must be taken if you feel uncomfortable about speaking to the harasser.

You may seek confidential advice from your Line Manager. Any advice will be confidential and will not be reported to anyone in the Company without your consent.

You may take the matter up with your Line Manager or if you prefer and an informal meeting can be arranged between yourself and the individual about whom you have a complaint at which an attempt may be made to resolve matters. Alternatively the individual may be approached and informal discussions held if you request.

No disciplinary action will arise at this stage as this is intended to be an informal procedure which will enable you to resolve the matter without any further action by the Company.

However, if you consider that a criminal offence has been committed (i.e., assault or a sexual offence) you should seek the assistance of your Line Manager, to make a formal complaint to the police. Where a serious criminal offence is alleged your Line Manager, will discuss with you whether reconsideration should be given to a report to the police.

You may be offered compassionate paid leave in certain circumstances or, if you feel that you need such leave, you should not hesitate to request it.

**Stage 2: Formal Stages**

If you have not been able to resolve matters on an informal basis or you consider the outcome to be unsatisfactory, you are entitled to make a formal complaint. The procedure that will be adopted is as follows:

You should make your formal complaint in the first instances to your Line Manager. This may initially be oral but you will be asked to put your complaint in writing so that the nature of the complaint is clear. It is recognized that the complaints may be sensitive and difficult to formulate and you should seek assistance from your Line Manager in formulating such complaint.

**Investigation**

The next stage will involve the investigation of your complaint. This will be carried out with sensitivity and with respect to you and the person against whom the complaint is made. The investigation will remain confidential and everyone who is interviewed will be told that they are not to discuss the matter with anyone and that breach of confidentiality is a disciplinary matter. The investigation will be carried out as follows:-

The investigation will be carried out as expeditiously as possible. It will be conducted by someone who is not connected with any of the allegations and who is at least a grade above the person against whom the complaint is made;

The investigator will carry out the investigation as he considers most appropriate. This is likely to involve interviewing all concerned. Anyone who is interviewed will be permitted to be accompanied by a friend, colleague or trade union representative;

Notes will be taken of the interviews and those interviewed will receive copies to ensure that they agree with the notes. The investigator will concentrate on the facts of the complaint and will avoid, wherever possible, embarrassing or intimate details. The complainant and harasser's witness statements will not be provided to any other party;

At all stages you will be kept informed of the progress of the investigation and are entitled to ask how the investigation is progressing.

During the investigation consideration will be given, wherever possible, to the complainant and harasser being kept apart at work. You will not be moved to any position that is detrimental to you or if you object to being moved. You are entitled to ask for compassionate leave but this will not be required of you.

### **The decision**

Once the investigating officer has carried out this investigation he will prepare a report. This will be submitted either to the Chief Executive or to a member of the Board of Directors who will decide whether the complaint has been conducted effectively. He/ she may wish to make further enquiries or hold a meeting in order to come to his/ her conclusion. A decision will normally be issued within 7 days of receipt of the investigator's report.

If you are not satisfied with the outcome of the investigation you have the right to appeal. This should be submitted in writing to the Chief Executive stating your full grounds of appeal.

### **The sanctions**

If the complaint is upheld, consideration will be given to the wishes of the complainant as to what should be done. This may involve:

Moving the harasser to another post. It should be noted that the question of disciplinary action against the harasser is a separate matter.

If the complainant so wishes, moving him/her to a different place or post. The complainant will be not required to move if this is not acceptable.

The complainant may be given leave or financial assistance to enable the complainant to recover from the effect of the harassment.

If the complaint is not upheld, because there is insufficient evidence, and the parties cannot work together consideration may still be given to any steps that can be taken to resolve the situation.

Complaints that are malicious, known by the complainant to be unfounded or made in bad faith may result in disciplinary action.

As an Equal Opportunities Employer, the Company monitors and keeps records of any complaints to ensure that harassment is being dealt with effectively and eradicated from the workplace.

Last update: Feb 2018

Updated by: Adrian Richards

Policy Owner: Adrian Richards

To be reviewed by: Feb 2019

(Reviewed/Updated by Susanna Howe, Just Admin July13)

## 13. Equality and Diversity Policy

As part of the commitment made by BF Adventure to Equality of Opportunity and Diversity we have adopted a policy statement relating to service users to support our equal opportunity and diversity policy, as an addition to employment practices and procedures.

### Equal Opportunity and Diversity Policy

BF Adventure is committed to eliminating discrimination and encouraging diversity amongst our staff, volunteers and service users.

Our aim is that all users of our service will be representative of all sections of society and each team member and service user feels respected and able to give their best. The purpose of this policy is to provide equality and fairness for all who use our service and not to discriminate on grounds of:

- Gender
- Marriage & Civil Partnership
- Race
- Disability
- Sexual orientation
- Religion or Belief
- Age
- Gender reassignment
- Pregnancy & Maternity

**BF Adventure opposes all forms of unlawful and unfair discrimination.**

All service users will be treated fairly and with respect. Everyone will be helped and encouraged to develop their full potential and the talents and resources of the team will be fully utilised to maximise the individuals' time with us.

### Our commitment

- To create an environment in which individual differences and the contributions of each individual are recognised and valued.
- Every service user is entitled to an environment that promotes dignity and respect to all. To that end no form of intimidation, bullying or harassment will be tolerated.
- We will regularly review all our equality and diversity practices and procedures to ensure fairness for all.
- Breaches of our equality policy will be taken very seriously and followed up appropriately by the management team.
- This policy is fully supported by the whole BF Adventure team.

The following statement forms part of the service users' induction (incorporated in 'The Deal')

### Equal Opportunities and Diversity Statement

**What does it mean for me?**

- Equality means treating people the same, even if they come from different backgrounds.
- Diversity is about recognising people are different and respecting these values and differences.

So while you are at BF Adventure you can be sure we will support everyone to achieve and reach their potential.

**What you can expect from us:**

- Listen to, value and respond to your views and ideas.
- Treat you fairly and with respect.
- Support you to reach your potential.
- Give information, advice and guidance when appropriate.

**What we expect from you:**

- Treat staff and peers fairly and with respect.
- Turn up open minded and willing to take part in activities.
- Listen and respond to policies and instructions from staff.
- Ask for help if you need it.

If you think you are not being treated equally or fairly please speak to your instructor or another member of the team.

Last update: Feb 2018

Updated by: Adrian Richards

Policy Owner: Adrian Richards

To be reviewed by: Feb 2019

(Reviewed/Updated by Susanna Howe, Just Admin July13)

## 14. Iced up Policy and Cancellation of Work days due to adverse weather

The aim is to ensure consistent and fair treatment for all in the organisation.

This policy is to cover the unavoidable cancellation of staff working days/hours from the diary/rota and is principally intended to give clear guidelines regarding unforeseen events.

### Allocation of Staff working time:

1. If, within 7 days, any amendments or cancellation of work days occur - due to booking cancellations or poor weather conditions

#### **Full Time Contracted staff:**

- a. Will be reassigned to another task/job role within their job description
- b. If notified that site inaccessible and hence closed may work from home - if approved by line manager OR must take Holiday and/or TOIL
- c. If not notified in advance and they arrive at site a standard days pay will be granted (i.e. as per normal) Staff should then work from home

#### **Part time staff:**

- d. Will be reassigned to another task/job role within their job description if possible
- e. Will be entitled to claim for equivalent paid Holiday hours (within entitlement for full year)
- f. If notified that site inaccessible and hence closed may take Holiday hours (within entitlement for full year)
- g. If not notified in advance of cancellation or closure of site and they arrive at site the allocated hours will be paid. Staff should then work from home
- h. If site is open and functional any staff not able to attend due to genuine weather conditions may claim Holiday or TOIL (No standard working time payments will be made, contracted staff with no remaining Holiday or TOIL will be expected to repay the lost hours at a future point)

Note: Senior management will need to coordinate diary management and updating of all staff if site to be closed - Notice of site closure must be given by 8am. If not given staff to attempt to access site and if impossible to have entitlement to full pay.

Last Update                      December 2018

Updated by:                      Tony Baker

Policy Owner:                    Tony Baker

To be reviewed by:              December 2019

## 15. ICT Policy

### Introduction

BF Adventure (BFA) recognises that Information and Communication Technology is a key aid to learning and the effective running of the organisation. Computers can be used to acquire, organise, store, manipulate, interpret, communicate and present information. For our clients, it is an integral part of the National Curriculum and a key skill for everyday life. BF Adventure recognises that its staff and clients should have access to quality hardware and software, and a structured and progressive approach to the learning of the skills needed to enable them to use it effectively.

### Organisation & Provision

BFA believes that progress in ICT is promoted through regular access and use of technology relevant to tasks, coupled with targeted training.

ICT network infrastructure and equipment has been sited so that:

- Each staff member has password protected access to either a desktop PC or a laptop.
- A client computer room is available with the specific intention of enabling individual clients or groups access to a dedicated internet capable PC in a supervised environment. This room will:
  - Have up to 6 desktops PC's
  - Have a dedicated printer.
  - Access to the internet will be controlled to ensure that no inappropriate material can either be viewed or downloaded. An instructor will be present at all times.
  - Have restricted access to the BFA server so that confidential documents cannot be accessed. Work may be saved by each student on a dedicated memory stick.
- BFA will maintain at least 1 working lap top for working away from site and that can be used for presentation purposes. This will:
  - Contain password protected profiles limiting access to authorised members of staff
  - A secure and password protected VPN system for logging onto the server while off site
  - Have limited and restricted access that must be authorised by the ICT manager

The ICT manager and/ or office coordinator will maintain records of all staff user names and passwords securely and also maintain access to the system as administrators.

### Equal Opportunities

All staff and clients, regardless of gender and ability, will have equal access to the ICT curriculum and will have the opportunity to make the most of their own potential, within this field.

### Management & Responsibilities

ICT manager - this will be the Finance Manager, who will work closely with Programme Managers to ensure best fit of hardware and software to both BFA staff and client needs. The Finance Manager will have overall responsibility for the systems.

Office Receptionist/Co-ordinator will have Day to day responsibility for maintaining ICT systems. Any problems should be reported immediately to the Office Administrator.

### Staff Training

The ICT manager will assess and address staff training needs as part of their annual development plan process or in response to individual needs and requests throughout the year.

Staff should take some responsibility for their own development and ensure that specific training needs are discussed during annual and interim appraisals but also at any time throughout the year when relevant.

## Health and Safety

BFA is aware of the Health and Safety issues involved in use of ICT and follows the recommendations of the Health and Safety Executive on display screen equipment. Staff who use VDU's regularly for periods of an hour or more are entitled to free VDU eye tests.

## Data Protection & Safeguarding

- A central log of IT equipment will be maintained by the Centre Manager.
- Network passwords are required to be 'strong' and will need to be changed every 3 months.
- Sensitive documents and data stored on the BFA server will have access restricted by password, or limiting network permissions. This information will only be accessible to staff dependent on need.
- Laptop computers may be taken offsite by users but must be securely carried in vehicles and out of sight of passers-by so as not to encourage or make easy, opportunistic theft.
- Any data contained on hard disc drives, memory sticks or other hardware must be transported in a secure manner and password protected and only as a temporary means of moving data.
- It is not acceptable to store client or company data permanently on personal external hard drives, personal cloud storage, or other portable storage devices.
- It is the responsibility of the user to ensure that all such data is properly protected at all times and failure to observe this requirement may result in disciplinary action.
- In conjunction with our IT support provider, the Centre Manager will be responsible for regularly updating anti-virus software.
- No discs from outside BFA should be allowed in machines without permission from the ICT manager.
- Social network sites:
  - Staff associated to BFA should ensure their social network sites have the privacy settings set so only friends can view the content of their profiles.
  - Social network sites can only be used during sessions if there is an educational benefit and permission must be granted by a manager.
  - The social network site's terms and conditions must be adhered to at all time including age restrictions.
- Third party agencies used to provide IT support need to provide assurances and suitable evidence that their safeguarding procedures are robust to ensure the safety of BF Adventure and its service users.
- Any equipment that stores data will have its memory securely erased or be destroyed before disposal by BFA.

## Cloud Services

BF Adventure use a number of cloud based services including Office 365, Podio, Xero and Cinolla. These systems enable greater working flexibility, allowing access to information from away from the BF Adventure site. Users of these systems must take responsibility for the data they access, ensuring



passwords are kept secure, PCs are locked and password protected, and ensuring any files downloaded are only saved within the Office 365 environment.

## On-going Management

At each annual policy review, any weaknesses and failings will be identified and an action plan created with clear timescales and responsibilities for resolution. This will be the responsibility of the Policy Owner.

Last update: 13/02/2017  
Updated Simon Beckham  
Policy Simon Beckham  
To be reviewed by: December 2017

## 16. Mileage & Expenses Payments

Valid from 1st June 2013- Version 1.0

Wherever possible BF's pool car should be used for travel to meetings/engagements on BF's behalf. This can be booked via the diary in the same way as the minibuses. If you are not able to use the pool car this you may be able to claim travel expenses as outlined below.

If you need to travel to a meeting or engagement, away from Goodygrane, on behalf of BF you are entitled to claim a payment to cover your motoring expenses. You can only claim payment for journeys to a destination other than your designated place of work. If the journey is voluntary but related to BF (to non-mandatory training or a fundraising event for example) please check to see if you are entitled to claim for expenses. All expenses must be approved by your line manager. The rates paid are set by HMRC and reviewed by them on a regular basis. If there is a chance you will claim for over 10,000 miles per year you need to record the number of miles you claim each month, the rate for each mile over 10,000 is less.

From 1 <sup>st</sup> June 2013	Up to 10,000	Over 10,000
<b>Cars and vans</b>	45p	25p
<b>Motor cycles</b>	24p	24p
<b>Bicycles</b>	20p	20p

If you choose to cycle you can claim the bicycle rate. Due to BF's remote location this should only be used within the local area and should be weighed up against the additional time taken to get to a meeting. Currently this will be left to staff discretion but this policy will be reviewed.

These rates are valid for travel from 1<sup>st</sup> June 2013 until further notice. Any expenses submitted after 1<sup>st</sup> June 2013 for travel before 1<sup>st</sup> June 2013 should be at the lower rate of 40p per mile.

### Meetings en route to/from home

If you attend a meeting on your way to/from work you are allowed to claim for the miles over and above your usual home/work journey. For example if you attend a meeting in Helston on

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To be reviewed by Centre Manager January 2019

<https://bfadventure.sharepoint.com/sites/teamportal/Shared Documents/Policies, Procedures and certification/Policy supporting documents and Archive/policy handbook/2018 policy handbook V1.1.docx>

your way home to Redruth your usual journey is around 9 miles. The journey, via Helston is 18 miles, you would be able to make a claim for the additional 9 miles travelled because you attended the meeting but not the miles of your standard journey.

## Claim Forms

All claims need to include any relevant locations you are claiming mileage to/from, and the total number of miles claimed. The claim must also state the programme the expense should be charged to (if applicable), or admin if it is a general BF expense. All forms must be signed by the staff member making the claim and approved by your line manager. A fully approved claim form will be paid direct into your bank account on the next payment run, payment runs are normally run once a week.

## Other Expenses

Wherever possible all payments should be made by BF direct to suppliers via invoicing, this allows for proper controls and cash flow planning. Where this is not possible and you have to pay for goods or incur expenses on behalf of BF you can reclaim them. You must attach a receipt to your claim form, provide full details of the expense and reason. The form needs to be signed by you and approved by your line manager.

## Petty Cash

Small value expenses can be claimed through petty cash, this does not include staff mileage claims as the total number of miles needs to be properly monitored. You can take a small cash advance from petty cash to cover expenses if the cost is pre-planned.

## Volunteer Expenses

Volunteers can claim expenses for their mileage from home to BF. Start and finish locations must be noted on the claim form as well as the programme you are asked to assist with (or admin/maintenance). The maximum claim per day for volunteer mileage is £11.50. Volunteers can claim their expenses from petty cash regardless of the amount as there is a separate float available for this.

## Forms

Expenses claim forms can be found in the blank forms folder in reception, on the company drive ([Company/Delivery Folder/BFA Policies/Expenses Form](#)) or on the intranet. Please use only this form to submit an expenses claim, if you don't your claim will be returned to you.

Last update: 13/02/2017

Updated Simon Beckham

Policy Simon Beckham

To be reviewed by: December 2017



## 17. Lone Worker Policy

BF Adventure will ensure, as far as is reasonably practicable, that employees who are required to work alone or unsupervised for significant periods of time are protected from risks related to this state or that the risks are adequately mitigated.

Particular consideration will be given to:-

- The nature of the risks and the effectiveness of mitigation
- The remoteness or isolation of the workplace
- Problems of communication
- Violence or criminal activity from other persons
- The nature of any injury
- An anticipated 'worst case' scenario

### Information and Training

1. Staff will be given information, instruction and supervision to enable them to recognise the hazards and appreciate the risks involved with working alone.
2. Staff are required to follow the safe working procedures devised which will include the provision of first aid, communication and emergency procedures.

### Summary Policy Statements

Working alone is not illegal, but it can bring additional risks to a work activity. Apart from the employees and volunteers being sure that they are capable of doing the job on their own, the three most important things to be certain of are that:

- the lone worker has full knowledge of the hazards and risks to which he or she is being exposed
- the lone worker knows what to do if something goes wrong
- someone else knows the whereabouts of a lone worker and what he or she is doing.

## BF Adventure Health and Safety Out of Hours and Home Visit Procedure

### Introduction

BF Adventure has a responsibility and is committed to the health, safety and welfare of the employees and volunteers. Consequently, it has established a procedure to ensure the safety of any member of the team that is not accompanied by another professional person.

As an employee or volunteer of BF Adventure, you have a duty to comply with the out of hours procedure set out below.

### Procedure

If you are working with a young person out of normal working hours (Monday - Friday 8.30am - 4.30pm), or are visiting their home and are not accompanied by another professional person, you must undertake the following steps:

1. Inform your line manager of the details of your appointment as listed below by either speaking to them in person (which is preferable) or leaving a message on their mobile phone.

- Name of client
- Client's address (or other venue)
- Telephone number
- Time of the appointment and the anticipated finish time

2. At the end of the appointment, you must telephone your line manager to advise them of this and confirm that you have left the client's home or venue.

3. If you have not contacted the manager within fifteen minutes from the previously advised finish time of the appointment, then they will try to contact you on your mobile phone in the first instance. If there is no reply, then the manager will endeavour to contact you on your home telephone number to ascertain whether you have arrived home safely and forgotten to make contact.

4. If there is no reply from your home telephone number or the person at home has not heard from you, the manager will contact the client where possible to check whether you are still there. If not, the manager will inform the Police and the person you have nominated as your emergency contact accordingly.

Visiting a client in their own home must only be arranged if there is no suitable alternative and with the proviso that a parent/carer or another professional is present at the visit. The member of staff must remain alert to potential risks to themselves, (including the presence of dangerous pets, drugs paraphernalia, potential for violence) and must end the visit if they consider themselves to be at risk. This decision should be discussed retrospectively with the appropriate Co-ordinator or Line Manager. In the event of a home visit that raises concerns about the safety of a child, young person or vulnerable adult, the Safeguarding Policy must be followed.

## BF Staff working on weekends

During weekends there is a limited support structure due to the working hours of the vast majority of the staff. The risks are:

- During normal work activities such as setting up, delivery and packing down, staff are more vulnerable should they have an accident in regards to seeking support, raising the alarm and obtaining medical treatment.
- Should staff turn up unfit to work, there is a check in place by means of a second person who could seek advice for a manager over the phone
- Should a member of staff not turn up for work then a call to a manager can be placed to allow for the problem to be solved

When working at weekends the following must be set in place as a minimum staffing requirement:

- 2 staff should always be present
- Both staff to carry mobile phones and radios at all times
- The weekend plan checked by a suitable manager / coordinator and staff made aware before the weekend

Last update: 05/01/2018

Updated EI Warren

Policy El Warren

To be reviewed by: January 2019

## 18. Legionnaires' policy

### Policy statement

BF adventure is committed to the preventing the spread of Legionnaires' disease to staff and visitors by setting in place procedures that are proportionate and satisfactory to the charities provision.

### Responsibilities

The overall safety of the site is the responsibility of the Centre Manager with specific responsibilities for management and implementation of this policy and procures sitting with the maintenance Coordinator.

### Potential sources of Risk

Schematic of BF Adventure Hot and cold water systems is available on SharePoint using this link:

<https://bfadventure.sharepoint.com/:w:/s/teamportal/ETv-O-lgd4FPkLQsixTa7iIBt5LZqdqDBF7oYZUZxUjYcg?e=0fe518a95d324ce28406b3f7b3a37d14>

#### Locations of hot water systems:

1. Hub kitchens - 2 x small heating washing units
2. Community kitchen toilets and showers - 2 x boilers
3. Campsite toilet block - 3 x individual electric heated showers units
4. Community kitchen - boiler

#### Possible sources of external contamination (sludge, rust, scale, algae, other organic matter and biofilms)

1. Water source- water is source at a bore hole on site and is UV treated in two locations (at source and community Kitchen toilet and showers)
2. Holding tanks
  - a. Bore hole
  - b. Community kitchen toilet and shower block (outside and inside in attic space)
  - c. Community kitchen
  - d.

#### Means of creating and spreading breathable droplets

1. Community kitchen toilet and shower block- 4 x showers
2. Campsite toilet and shower block - 3 x showers

#### Who is potentially at risk

Staff, visitors and residential users

#### Managing, Preventing and controlling the risks

1. Hot water systems set above 60 °C
2. All taps run on a weekly basis to flush the system
3. Holding tanks cleaned annually or as required
4. UV filters and particle filters included in the systems



5. Shower heads removed and cleaned in March / April after the winter and before the residential season

**Record keeping**

1. Records will be managed and kept by the maintenance Coordinator, these will include:
  - a. What was checked
  - b. Who checked it
  - c. Actions carried out
  - d. Observations of abnormal, broken or malfunctioning systems are recorded and reported
  - e. Dates of checks

**Reporting**

1. Any incidents of Legionnaire's disease need to be reported to the Centre Manager using BF adventure incident reporting system immediately
2. This will then reported using the RIDDOR system to the local authority with 48 hours

Reviewed by: Tony Baker

Date: January 2018

Policy Owner Tony Baker

Review Det: January 2019

## 19. Smoking Policy

### Aims

BF Adventure aims to promote and advance healthy living and lifestyles to service users across our entire spectrum of provision and delivery. We understand and respect that specific service users currently rely on smoking and it is hoped that the following policy supports and provides enough guidance for them to reduce smoking enough to participate in activities at BF Adventure in a setting which aims to be completely “smoke free” for all.

This policy refers to all provision provided by BF Adventure

### General

BF Adventure will promote itself as a Healthy living site to all users.

1. Signs will be placed at the entrance gate, receptions, in rooms and in toilets clearly displaying that we are a non-smoking site
2. Clients making bookings will be made aware at point of booking and in the terms and conditions that we are a Healthy Living site, the reasons in reference to the change and the consequences for smoking on site
3. Consequences will be agreed for all users specific to their individual needs - see below
4. If staff are handed tobacco by someone under the legal age for purchasing tobacco then instructors are not permitted to hand the tobacco back to the client.
5. Resources and support will be made available for the delivery team to assist with this policy
6. Service users will be supported by staff while at BF Adventure to reduce smoking with the aim of having no cigarettes while on provision and offered IAG about the facts around smoking
7. All agreed smoking plans should be managed discreetly away from the sight of other service users and where possible at designated times
8. Smoking offsite is actively discouraged by BF staff due to the nature of the small roads leading to and from BF Adventure.
9. Smoking during Activities is strictly not allowed

### Staff

10. Will be expected to promote and enforce the policy and report situations of smoking to a manager should they feel unable to deal with them, all smoking incidents that have been dealt with during the course of the day should be inserted into relevant daily reports, (if applicable), and reported back at end of day de-brief
11. Support will be made available through managers, non-smoking champion and team leaders to support with tension and disruption from noncompliant service users
12. Staff will not be allowed to smoke during BF Adventure's time of operation

### Day visits

13. Smoking will be discouraged for the duration of their visit, should it be necessary to allow the group to smoke this must take place out of site and at designated time. Consequences for not following an agreed plan could be:
14. **Consequences** for smoking on site:
  - 14.1. First instance- reminder of the rules and asked to stop smoking
  - 14.2. Second instance- individual(s) removed from sessions for the remainder of the day- no refunds (T and C)

- 14.3. Third instance- whole group asked to stop activities and no refunds (T and C)

### Core service users

15. Core service users will have bespoke arrangements for not smoking while at BF Adventure as agreed with them at the time of booking which will be drawn up from one of the following template terms and conditions.
- 15.1. See Annex 1 outlining a completely non-smoking policy
- 15.2. See Annex 2 for outlining a supported reduction policy

### Residential users

#### 16. Behaviour plan

- 16.1. Before or at arrival, a discussion with their Lead Instructor / the Team leader / the Centre Manager / Booking Coordinator / Duty Manager should place and agree a behaviour plan. The plan should support the policy statement about promoting positive health and its aims to becoming a smoke free site. Plans can include:
- 16.1.1. Designated time and places for smoking
- 16.1.2. an agreed reduction in smoking over the course of the residential

#### 17. Consequences for not following the Behaviour plan

- 17.1. First instance- reminder of the rules and asked to stop smoking
- 17.2. If refuses to stop smoking or second instance - removed from activity session and Group Lead to provide supervision
- 17.3. Third instance- individuals removed from sessions for the remainder of the day and Group Lead to provide supervision- no refunds (T and C)
- 17.4. Fourth instance- individual asked leave site at the groups expense- see terms and conditions
18. If visiting groups wish to smoke off site (outside of BF Adventure provision) then this is a controlled practice led and supervised by visiting Group Leader, with BF Adventure being informed. BF Adventure does not recommend this strategy and advises that the lane or any wooded area is not to be used for this due to safety reasons.

## Annex 1:

## Core programme - Skills for Life Non-Smoking Policy

Terms and conditions:

1. If a young person arrives on site with tobacco/cigarettes etc. they will be asked to surrender the material for disposal or deposit it in a locker for the duration of the day, (leaving tobacco in their bag/coat in a locked room is also acceptable). If the young person chooses to keep the tobacco on their person it must remain concealed for the duration of their provision at BFA and until they are completely off site. If a young person on the programme ignores the policy the following cumulative consequences will apply;
  - 1.1. **First instance-** verbal warning issued, time out from activity while the young person deposits smoking material or surrenders for disposal, with smoking related IAG provided.
  - 1.2. **Second instance-** miss full activity session with further Smoking related IAG (if at end of day, missed session is carried to following week etc.)
  - 1.3. **Third instance-** miss the following weeks session, (non-refundable).
  - 1.4. If the young person continues to ignore the smoking policy then they will take no further part in activities and every effort will be made to transport the young person from site, either through arranging for their transport to arrive early or through transport in a BFA vehicle back to the young persons' school or home. (Transport costs incurred by BFA may be recovered from the referral agency).
  - 1.5. If a young person is routinely smoking each week despite consequences in place the matter should be referred to the Programme Manager/ Co-ordinator. The PMC will discuss sanctions with the individual and/or contact the referral agency/ parent/ carer and discuss a solution to ensure smoking on site is stopped

## Annex 2

### Core programmes- Supported reduction policy and terms and conditions

#### 1. Support

When working with older service users it is important to understand the foundation of this policy is built upon working with the individuals. Clear communication, planning and setting up realistic expectations is key to promoting a healthier lifestyle and the following policy is a template in which to tackle the issue of smoking with respect. Modifications, exceptions and changes can be made to tailor fit this policy to the service users but the overall aim should be a smoke free centre needs to be the ultimate goal.

We can expect people to at times fall off the agreed smoking reduction plans agreed with BF Adventure staff for a wide variety of reasons. Having agreed strategies and consequences is key to managing the policy and careful consideration needs to be given to this so its achievable and appropriate to the individuals concerned. The below “consequences” is considered fairly universal but can be modified while a smoking reduction plan is being agreed at the start of a provision.

#### Example smoking reduction plans could be:

Clients on extended programmes (more than 1 week) who rely heavily on smoking will be offered a choice at point of referral or on day one of their provision as to how they wish to meet the smoking policy:

##### 1.1. Refrain from smoking from day one

##### 1.2. Follow the ‘3, 2, 1, 0’ process

1.2.1. The first part of a provision, the client can pre plan with the instructor up to 3 cigarette breaks

1.2.2. Second part of a provision, the client can pre plan with the instructor up to 2 cigarette breaks

1.2.3. Third part of a provision, the client can pre plan with the instructor up to 1 cigarette breaks

1.2.4. On the fourth part of a provision the service user would not be permitted any breaks for cigarettes

1.2.5. Breaking these conditions and not conforming to the pre-arranged cigarette breaks will result in the consequences listed below on this policy

#### 2. Management

2.1. Suitable times and locations for smoking should be agreed early on in the groups plan and adhered too

2.2. Secure storage of smoking materials- Secure storage can be located in the main office area if necessary.

2.3. Designated areas of smoking should be kept clean and tidy

#### 3. Consequences

3.1. First instance- time out from activity with Smoking related IAG provided

3.2. Second instance- miss full activity session with further Smoking related IAG and a consequence as agreed in the deal

3.3. Third instance- miss the following weeks session and not able to participate in reward week- no refund to service provider / user

3.4. Fourth instance - sanctions such as cancellation of provision with no refund to service provider / user can be considered

Last update: February 2018

Updated by: Tony Baker

To be reviewed by: February 2019

To be reviewed by: Tony Baker

## 20. Staff Personal Use of Equipment and Site facilities

The aim is to ensure consistent and fair treatment for all in the organisation.

Staff member **MUST** obtain prior written Authorisation from Centre Manager for any out of hour's use of the site facilities and equipment.

All damages must be reported immediately to the centre manager by email.

Staff must ensure they only engage in activities that they are authorised to run with clients unless express permission from the centre manager and must not use any equipment they are not fully inducted and signed off for. All standard operating procedures **MUST** be adhered to.

### Consumption of Alcohol

Moderate consumption is permissible and participants must not have consumed alcohol prior to participation (as a minimum all participants must be under the drink drive limit prior to initiating activity).

Special events such as the Christmas party can be exceptions to the rule and this is to be decided by the management team in advance of these events.

### Illegal substances/drugs:

No consumption is permissible and anyone found in breach of this policy will be reported to the Police in line with standard procedure.

### Safety & Security:

**Equipment** – Staff member assumes full responsibility for the equipment and must ensure it is fit for purpose and operated according to standard operating procedure. Any potentially dangerous equipment (including sharps) must be securely stored and not accessible to any clients upon site.

When staff borrow equipment, it is borrowed on a “break it and pay for it” understanding. If staff do not have the capability to pay for the equipment to be repaired or replaced then they should consider not using the equipment in the first place.

**Open Fires** – These are only permissible within designated areas and residents must provide their own timber supplies and must not utilise any from the site including wind fall etc which would deplete the natural resources of the site.

Fires should be of a manageable size with flames no higher than waist height in suitable locations such as the fire pit.

**Guests on site** – All guests coming onto site must be reported to the centre or Duty manager in advance of their visit. All Normal Operating Procedures remain the same and any exceptions must be authorised by the centre manager.

Last Update

January 2018

Updated by: Tony Baker  
Policy Owner: Tony Baker  
To be reviewed by: January 2019



## 21. Substance Misuse Policy

### Aim

To state BF Adventure's position with regard to service users and customers suspected to be under the influence of substances, including alcohol, whilst on site, or service users or customers who are suspected to have brought substances onto site.

### Policy

**Any mainstream customer who has consumed or is reasonably suspected to have consumed or is believed to be in possession of any substance will be subject, at BF staff discretion, to any or all of the following:**

- Refused access to the site including start of any planned activity or programme
- Removal from the activity and the site
- The name of the customer being given to any authority (see data protection policy)
- Customer not able to return to BF for further events
- In some occasions BF staff may feel necessary and appropriate to contact the police

**Any Core service user who has consumed or is reasonably suspected to have consumed or is believed to be in possession of any substance will be subject, at BF staff discretion, to any or all of the following:**

- Refused access to the site including start of any planned activity or programme
- Removal from the activity
- Asked to hand over the substance to a member of staff
- Asked to provide personal belongings to be searched
- BF staff to deliver Information, Advice and Guidance including signposting opportunities
- BF staff contacting the referring organisation
- The name of the client being given to any authority (see data protection policy)
- Being removed from the site
- Ongoing incidents may lead to exclusion from BF provision
- In some occasions BF staff may feel necessary and appropriate to contact the police

Last update: 05/01/2018

Updated by: EI Warren

Policy Owner: EI Warren

To be reviewed by: January 2019

## 22. Sustainable development Policy

### Introduction

BF Adventure (BFA) recognises the importance of sustainability which covers the following areas:-

1. Social which includes Human Rights, Employment Rights and Governance
  2. Environmental
- BFA acknowledges the impact of its own activities on the natural and local environment in which it operates.
  - BFA is committed to an on-going programme of management and improvement so that its adverse impacts are limited and more positive impacts are developed.

### Human Rights

BFA is committed to eliminating discrimination and encouraging diversity amongst our staff, volunteers and service users.

BFA has a stated policy on Equality and Diversity which is reviewed annually.

In order to support its aims, staff are fully briefed and are required to undertake interactive on line training

### Employment Rights

BFA will comply with all aspects of current legislation.

BFA has a performance reporting framework which requires that all staff receive a full appraisal once a year, an interim appraisal and individual one to one discussions as and when necessary.

BFA work standards are underpinned by established Staff Success Factors which are part of a performance review process.

### Governance

Under direction of the Board of Trustees, BFA operates a Governance Committee which consists of a minimum of 2 Trustees and the Chief Executive Officer.

Its aims are to ensure the Charity operates within the Charity Commission rules and Company Law and that its operations meet its charitable objectives.

The Governance Committee also undertakes periodic risk reviews and develops action plans to remove or reduce risks to the long term future of the Charity.

### Environment

Please refer to BFA Environmental policy which can be found within the Normal operating procedures

Last update: Feb 2018

Updated by: Adrian Richards

Policy Owner: Adrian Richards

To be reviewed Feb 2019

## 23. Third Parties

This policy is intended to ensure that third party users agree to a safe method of working when operating at BF Adventure, to ensure that any agreements and or contracts with service providers are not compromised, that where appropriate site procedures are understood and followed and that the reputation of BF is not compromised.

Example of third parties are but not limited to:

3. External companies employed by BF to provide provisions
4. External companies using and or hiring activity sites and or equipment for use with their own clients

The following conditions must be met before third parties are allowed to operate at BFA.

1. Insurance
  - a. Evidence of public liability Insurance cover must be provided
  - b. This must be equal to BFA's level of cover
  - c. This must be in date and valid
  - d. A copy must be stored in the Third Party users file
2. Risk Assessments, operating procedures
  - a. Evidence of a safe working practice must be produced and checked
  - b. The CM or in their absence a senior manager must check this to ensure there are no contradictions with the BFA policies and procedures and where there are BFA policies and procedure take precedents unless otherwise negotiated.
  - c. These must be valid and in date
  - d. The quality must be assessed by the CM or in their absence a suitably experienced manager
  - e. Copies must be placed in the Third Party user file
3. Safeguarding
  - a. When working with BF Adventure's service users, a DBS check must be carried out in accordance with its Safeguarding procedures
  - b. When working with non BF Adventure clients, BF adventure expects that safeguarding procedures are set in place.
  - c. BF Adventure may request to seek evidence that this process has taken place
4. Schemes of work
  - a. Where appropriate, these should be checked
  - b. Copies must be placed in the third party user file
5. Qualifications and membership
  - a. Qualifications that are relevant should be checked
  - b. Where relevant, memberships should be checked
  - c. Copies must be placed in the third party user file
6. Service Level Agreement (SLA) Completed (annex A)
  - a. Agreement to operate to BFA policies (NOP and policy folder), an agreement statement is set into the SLA
  - b. Copies must be placed in the third party user file
  - c. Conflict of interest, these must be declared
  - d. Intellectual copyright
  - e. Confidentiality

Normal text

Last update: January 2018

Updated by: Tony Baker

Policy Owner: Tony Baker

To be reviewed by :January 2019

## Service Level Agreement (SLA) for Third Party Users

Company Name			
Contact Person			
telephone		email	
Address			
postcode			
<b>activity / provision description</b> <i>Please include activities you are providing, equipment you are borrowing and the outline of clients you intend to work with</i>			
<b>Please read the following statements and sign to agree to abide by them when operating at BF Adventure.</b>			<b>Sign</b>
I agree to abide by the policies and procedures at BF Adventure as laid out in the Normal Operating Procedures (section 3 and relevant sections only) and the policy hand book. Copies of which are available upon request. Where conflicts in procedures are present, agreed exceptions will be detailed on page 2 of this SLA			
I agree to maintain and update my risk assessments, schemes of work and lesson plans, insurance, relevant qualifications and memberships as agree at the start of SLA and provide updates copies to BF Adventure.			
I agree to declare to disclose any conflict of interest that may be present are declared at the earliest possible opportunity to the Centre manager			
I agree that any products or services provided by BF Adventure remain the property of BF Adventure and copying, duplicating and agree not use these services and products outside of BF Adventure with express permission from a senior manager			
I agree to submit DBS certificates / perform a new DBS check / provide evidence of a DBS check as requested by the Centre manager			
I agree to respect BF Adventure's clients and keep all information confidential and not share or discuss clients with outside agencies with the express permission from a manager.			
I agree that all bookings must be made in advance and permission granted by the relevant coordinator.			
office use only:			
insurance certificate			
risk assessments			
DBS			
SOW and Session plans			
quals and memberships			

Office use:

Please outline any specific operating agreements that fall outside of BF Adventures normal working conditions

This SLA is valid from the dates below and is due for review in 5 years or at the request of the Centre manager.

Third Party Name			
Date		Sign	
Centre manager			
date		Sign	

## 24. Vehicle Policy

### Background

BF Adventure is a not for profit registered charity.

BF Adventure operates a small fleet of minibuses which are used to transport clients to and from agreed pick up points and to take them to agreed locations in order to undertake activities.

Its authorised drivers consist of paid staff and volunteers.

### The Law

#### Section 19 Permits

The charity operates its minibuses under a Department for Transport, Transport Act 1985: Section 19 Standard Permits which allow:-

- The charity to make a charge on a cost cover only basis
- Drivers to be paid or an unpaid volunteer
- Vehicles may only be used for charitable purposes and are not used for the general public.

#### Who can drive?

- Notwithstanding the following guidance all staff require authorisation to drive and compliance with these guidelines does not infer an automatic right.

#### Pre 1st January 1997 Licence Holders “Acquired Rights”

Car Licence obtained before 1st January 1997 Any driver who obtained the entitlement to drive a car prior to 1st January 1997 (shown as “Group A” [or B for automatics] on an old style licence or as “Category B” and “D1 not for hire or reward” on a new style licence) they are legally permitted to drive a minibus or PCV provided the following is adhered to:

- *They are aged 21 years or older*
- *The minibus has a maximum of 16 passenger seats*
- *The minibus is not being used for hire or reward*
- *Not allowed to drive abroad on commercial basis*
- *If over 70 must pass the PCV Medical*
- *All drivers MUST also satisfy BF Adventures internal requirements – see points 19-33*

#### Note: CPC Training

Drivers with acquired rights who operate minibuses are required to take Driver Certificate of Professional Competence (CPC) training every 5 years which is a minimum of 35 hours. As BF Adventure operates as a not for profit or commercial operator we are exempt from this.

#### Post 1<sup>st</sup> January 1997 Licence holders (DVLA leaflet INF 28, 7/12)

Car Licence obtained after 1st January 1997. Anyone who passed their category B car test after 1st January 1997 will not have D1 entitlement on their licence, however, they may still drive a minibus with up to 16 passenger seats provided they satisfy each & all of the following points:



1. *They are driving on behalf of a non-commercial body for social purposes but not for hire or reward (unless operating under a permit)*
2. *They have held a car (category B) licence for at least 2 years They are aged 21 years or older (see point 9)*
3. *They are providing their service on a voluntary (unpaid) basis – **However section 19 permits override and paid drivers are permitted to drive.***
4. *The minibus maximum weight does not exceed 3500kg (or 4250kg if fitted with accessible equipment designed for the carriage of passengers with disabilities or wheelchair users)*
5. **They are not towing a trailer**
6. *They are only driving the minibus in the U.K.*
7. *All drivers MUST also satisfy BF Adventures internal requirements – see points 19-33*

These requirements are above and beyond those which regulate drivers who passed their car test prior to 1st January 1997 and so there are many more considerations to take in to account for drivers that fall in to this category.

### Trailers

8. Bf operate 2 trailers:
  - Small trailer which weights <<KG>> and has no brakes
  - Large box trailer which weighs <<KG>> and has brakes
9. Staff with “inherited rights” are permitted to drive the large trailer (a trailer over 750KG) with any of the 17 seated mini buses (Vehicles over 3500KG MAM)
10. Staff who passed their driving test after 1<sup>st</sup> January 1997 can drive the small trailer using vehicles under 3500KG MAM
11. When using a trailer:
  - The appropriate licence plate must be displayed
  - Lights must be checked regularly and before each use

### Booster seat

12. Mini bus-BF Adventure does not have available booster seats for use in its mini bus fleet so is not required by law to have children under 153 CM or 12 years of age to use booster seats
13. Cars-Children under the age of 12 years or under 153 CM tall that are transported in planned activities including pick up and drops off in cars operated by BF Adventure staff are required to use booster seats
  - Children under the age of 12 or smaller than 153 CM are permitted to travel without the use of a booster seat in unplanned or short journeys

### Insurance

The insurance requirements are a set of separate but essential criteria which **must be satisfied in addition to Licence holder requirements.**

14. Drivers must be over 21
15. **Driver under 21 must be advised in advance (please refer to point 2 above)** to the charities insurance broker, Towergate Insurance in Falmouth (contact Andy Winnan 01326 213216; email andrew.winnan@towergate.co.uk)
16. Drivers over 25 do not need to be advised
17. Drivers must have had a full UK licence for at least 5 years or have had at least 1 year's minibus/mpv experience.

## BF Adventure

### Fixed Penalty Points and Convictions

18. Staff who have fixed penalty points and or driving convictions will need to have a risk assessment completed by a senior member of staff before being allowed to drive BF Adventure or personal vehicles for work related purposes
19. All staff who obtain new fixed penalty points and or convictions must declare these to the Centre Manager or another member of the SMT in their absence

### Driver Training

20. The charity requires all of its drivers to undergo driver training
21. The preferred training is the Minibus Driver Awareness Scheme which promotes a nationally recognised standard for the assessment and training of minibus drivers.

### Licence review

22. Authorised drivers will be asked to produce for inspection their licences for annual inspection to ensure there are no endorsements which prejudice their authority to drive BF Adventure vehicles. Any new endorsements accrued must be declared and an updated paper licence presented for inspection. A review process will be established.

### Vehicle Maintenance

23. The Charity operates and maintains its vehicles on a 15 week inspection cycle through a local garage and its vehicles have a full service in accordance with the vehicle manufacturers recommendations but at least annually.

### Reversing BFA vehicles

24. All staff need to have a Banksman in place when reversing in BFA minibuses
25. Reversing needs to be slow and controlled

### Seating positions

26. Where possible, service users are not permitted to sit in the front of any vehicles unless:
  - They are a group leader or a responsible adult
  - No available spaces behind the driver
  - When using personal cars it is more practical (car shape and or size) or safer to have the service user in the front
27. Where practical every measure should be made to position a second instructor / volunteer / group leader near the rear exit when using mini buses

### Animals in Vehicles

28. All efforts should be made to ensure that at no times animals are to be transported in the vehicles. This will eliminate distraction and avoid cleaning the vehicles after its use.
29. Should it be necessary (part of activity) then dogs are allowed to be transported in the vehicles. In this situation the following must occur:

- Manager permission must be obtained at least 24 hours before the event is due to take place. It should be noted that when planning activities every effort should be made to inform a manager of this at the start of the term or when the service users initial activity plan is being produced
- The vehicle will need to be cleaned after use to remove dirt and animal hair
- Animals to be harnessed and managed so that they are of no risk to drivers or passengers whilst in transit.

## Luggage

30. All Luggage must be stored in such a manner as not to cause obstruction to exits and so it does not cause an obstruction to exiting the vehicle

## Driving time and rest periods

The transporting of service users at BFA makes up part of an activity experience (i.e. moving service users to and from planned activities and picking up and dropping back service users from BFA) and is not the product we offer. With this in mind, in a normal working day staff only drive locally and the total driving time is almost always under 4 hours per day.

Based on the information gained by MIDAS and the VOSA document PSV 375 : Rules on Drivers Hours and Tachographs - PSVs in GB and Europe, we are exempt from the legislation provided. That said, BFA have introduced a set of guidelines to ensure staff welfare and the safety of all passengers are taken into account.

31. Staff are required to take a 15 minute break every 2 hours of driving (parked off the road and with the engine off)
32. Planned journeys over 2 hours will be staffed by 2 suitably qualified drivers where possible
33. Staff have the responsibility to inform the managers at BFA as early as possible (ideally in the planning stage of a programme) if they feel that they are unsafe to drive.
34. The working time policy will be adhered too in terms of work load and rest periods

## Hiring / loan of vehicles to other organisations

From time to time BF Adventure will allow its vehicles to be used by other organisations on a “not for profit” premise, these will usually be charities or organisations associated to BF Adventure. In these circumstances BF Adventure will:

35. Make a per mile charge or a single one off charge to cover running costs
36. Ensure that all drivers meet the requirements set out in this policy
37. Will ask the third party to sign a hire agreement that sets out terms and conditions to recover costs associated with repairing any damages incurred while on hire / loan

## The use of personal cars

### 38. Mileage and claim for miles being driven for work purposes

Staff can claim a per mile rate for miles driven for work purposes. This payment is intended to cover a significant contribution towards the running costs of the staff's personal vehicle. Please see “mileage and expenses payments” policy in this document for more information

### 39. Documentation

All staff who drive on Company business whether they use a company vehicle or their own, will be required to produce their annually or on request the following:

- Driving Licence
- current MOT
- vehicle insurance certificate, covering business use.

All drivers will be deemed to have consented to permit their employer to contact the DVLA to check for any endorsements annually.

Documents will be entered onto our HR system for record keeping and monitoring

Failure to produce the driving licence when requested may result in disciplinary action being taken.

#### **40. Penalties and accidents**

Employees are required to inform their line manager of any Road Traffic Accidents (RTA) involving Company vehicles or their own vehicle as soon as it is safe to do so, whether or not any damage is sustained to the vehicle.

All employees must inform their line manager of any driving penalties either received or pending within 5 working days of notification.

#### **41. Employees' responsibilities**

Drivers of vehicles used for company business must:

- Comply with all traffic legislation when driving a vehicle;
- Ensure they hold a current driving licence for the class of vehicle they are driving;
- Immediately notify their supervisors or managers if their driving licence has been suspended or cancelled, or has had limitations or endorsement placed upon it;
- Be responsible and accountable for their actions when operating company vehicles;
- Not use a hand-held or hands-free mobile phone whilst driving;
- Not carry any unauthorised passengers when driving company vehicles;
- Regularly check the oil, water, brake fluid and tyre pressure of their own and company vehicles they regularly use, particularly before long journeys;
- Report any crashes and scrapes to the transport/fleet manager, including those which do not result in injury;
- Follow the accident procedure;
- Read any updates that the Company may periodically issue on road safety matters. These will include information on good practice as well as forthcoming legal changes which affect those who drive for work.
- Employees are also responsible for ensuring that they are physically fit to drive. Should this change, their line manager must be informed as soon as possible. In the event that medication is necessary, employees should check with their GP or pharmacist before driving, even for short distances.

The following non exhaustive list of actions will constitute gross misconduct and disciplinary action may be considered:

- Accumulated points suspension;
- Driving whilst disqualified, or not correctly licensed;
- Driving under the influence of drugs or alcohol;

- Reckless or dangerous driving causing damage, death or injury;
- Failing to stop after a crash;
- Any actions which warrant suspension of a licence.

#### **42. Vehicles**

Any employee driving their own vehicle must ensure that it is kept in a safe and roadworthy condition at all times. The management accept that employees may be without their vehicle when repairs are necessary to keep the vehicle in a safe and roadworthy condition. However, employees must give as much notice as possible so that alternative arrangements can be made.

Staff must maintain a clean and tidy vehicle

#### **43. Mobile Phones**

Use of hand-held or hands-free mobile phones whilst driving is prohibited. The ban covers all work-related driving, including when using Company vehicles and employees' own vehicles. The Company do not provide employees with hands-free kits.

It is illegal to use a hand-held mobile phone while driving.

It is also an offence to "cause or permit" a driver to use a hand-held mobile phone while driving. Therefore, employers can be held liable as well as the individual driver if they require employees to use a hand-held phone while driving. It can be illegal to use a hands-free phone while driving. Depending upon the individual circumstances, drivers could be charged with "failing to have proper control of their vehicle". And in more serious cases, the use of any type of mobile phone could result in prosecution for careless or dangerous driving.

Drivers may only use a phone in a vehicle when it's parked in a safe place. This means the driver must pull over and stop in a safe place to answer or make a call.

#### **44. Satellite Navigation Systems**

Satellite Navigation Systems can be a useful tool for drivers; however, they can also be a dangerous distraction.

- All destinations should be entered while the vehicle is stationary in a safe place. All drivers should stop if it is necessary to take their eyes off the road to check routes.
- They should be positioned so as not to impair vision. They should not be positioned where they are likely to cause injuries in the event of a collision.
- All vehicle distractions should be kept to a minimum and it is the responsibility of the driver to ensure that they are not likely to be distracted.

#### **45. Drink and Drugs including medicines**

BF Adventure operates a zero tolerance drink and drug driving policy. All employees are encouraged to report concerns about colleagues with regards to drink or drugs as soon as possible. This can be done anonymously if necessary. See Whistleblowing Policy.

Any driver taking prescription or over the counter medicines must ensure that they are still fit to drive. Many prescription / over the counter medicines can have a serious effect on the ability to concentrate and can contribute to accidents. Such medication may include cold remedies, some cough medicines, pain relief - especially those including opiates, and antidepressants which may cause muscle spasms.

Any driver who may be unfit to drive must inform their line manager immediately. They must not drive.

#### **46. Parking Tickets/Fines**

If parking tickets are given to any Charity or Personal vehicles whether or not they are being used for business purposes, the driver/keeper of the vehicle is to ensure that the Duty / Centre Manager is informed as soon as reasonably practicable.

All fines and tickets incurred will be the responsibility of driver and the driver will be liable to pay the fines promptly.

#### **47. Journey Planning**

All appointments are scheduled to a realistic timetable and are planned to take into account the essential need for adequate rest periods. Any employee who feels that their timetables/schedules are unrealistic and they need to take risks or break speed limits to complete them must voice their concerns with their line manager as soon as possible.

#### **48. Severe weather**

The Company recognises that severe weather particularly affects employees whose job involves driving and extra care must be taken when driving in severe weather conditions and more time must be allowed for journeys. Coordinators and managers will monitor weather conditions and will inform staff if there is a need to reschedule appointments if conditions become too dangerous for the drivers.

#### **49. Vehicle maintenance**

All drivers are required to carry out basic maintenance on the vehicle for which they are responsible. They should check oil, water, tyre pressures and windscreen washer fluid regularly.

#### **50. Breakdown**

Depending on staffs contractual obligation and the frequency in the use of their vehicle, there may be justification to have suitable breakdown cover in place. For staff who operate very local to BF and infrequently use their personal vehicle then breakdown cover is not required.

Please see your line manager for a advice on this

In the event of a breakdown:

- Make yourself and your passengers safe:
  - If possible, avoid stopping in dangerous places such as roundabouts and corners;
  - Switch on your hazard lights;
  - If it is safe to do so, drop your speed, continue driving and try to pull off the road completely, or onto a straight section of road;
  - If you have to stop on a road, display your emergency triangle at least 45 metres behind your vehicle (don't do this on a motorway);
  - Do not attempt to fix your vehicle yourself by the roadside;
  - Switch off your engine and wait in a safe place, away from traffic.
- Call for help
  - . Contact your breakdown and recovery service or BF Adventure Duty Manager to provide assistance and support

- If possible, use the nearest emergency phone. On motorways, blue and white marker posts show the direction of the nearest phone. The phones connect directly to the police control centre and are numbered so that you can be easily located.
- If using your mobile phone, refer to the new blue rectangular Driver Location Signs, which detail the road number (e.g. M1), direction of travel and precise location.

## 51. Accident

If a vehicle being used on Company business is involved in an accident (RTA) the following steps are to be taken

- Stop your vehicle in a safe location making sure you are not obstructing traffic;
- DO NOT admit liability;
- Ensure your own safety first;
- Call the emergency services if anyone is injured or if property is damaged;
- If the police attend the scene, note the reporting officer's name, identity number and station;
- Note information about the accident, exchange details with third parties including registration numbers/s of vehicles, names and addresses and take the names and contact details of witnesses;
- Third parties are obliged to give you their name, the vehicle registration number and insurance details under section 170 of the Road Traffic Act 1988;
- Give your information including name, address and company details;
- If a camera is available, photograph the scene from different angles;
- Take pictures of the vehicles involved and of the damage to your own and third party vehicles/property;
- Contact your line manager as soon as you are able.

## Reference Points

- PC Hartnell Devon and Cornwall Constabulary 29/11/11
- DVLA Information Leaflet INF28
- [www.hants.gov.uk/minibusesforschools/minibuses-pemits.htm](http://www.hants.gov.uk/minibusesforschools/minibuses-pemits.htm)
- Brian Smith, Transport Contracts Manager, Volunteer Cornwall
- [www.structured.co.uk/minibus/minibus-permits-section19.html](http://www.structured.co.uk/minibus/minibus-permits-section19.html)
- UK Road Safety – ken Buchanan
- PSV 375 : Rules on Drivers Hours and Tachographs - PSVs in GB and Europe
- Driver CPC for lorry, bus and coach drivers <https://www.gov.uk/driver-certificate-of-professional-competence-cpc/overview>
- Towing with a car <https://www.gov.uk/towing-with-car/driving-licence-rules-and-what-you-can-tow>

Last update: January 2018

Updated by: Tony Baker

Policy Owner: Tony Baker

To be reviewed January 2019





## 25. Weapons Policy

### Aim

To state BF Adventure's position with regard to customers and core service users suspected to be in possession of a weapon, or any implement that could be used as a weapon.

### Definition

A weapon is defined as any instrument which could cause harm to the possessor or a third party.

Note:

1. Many items held by a customer or core service user in the normal course of BF Adventure activities could be construed or employed as weapons. It is for the instructor to assess the risk of allowing customers or core service users to have access to items that could be used as weapons and the point when reasonable access becomes unreasonable.
2. BF staff, at their discretion, should take positive action to remove from the customer or core service user and within the vicinity of the activity items that could be used as weapons.
3. BF staff should not allow items that could clearly be used as weapons to be left around the site unsupervised, for example tools used in the course of maintenance of activities. All such items should remain in the possession of the staff undertaking their duties and during any break from performing the task the items should remain with the staff member or be appropriately stored away.

### Policy

BF Adventure will not tolerate possession of any weapon or item used as a weapon.

**Any mainstream customer who has or is reasonably suspected to have in their possession a weapon or item that could be used as a weapon will be subject, at BF staff discretion, to any or all of the following:**

- Asked to place the item in secure storage for the duration of their session, such as locking in the boot of their own vehicle
- If no personal secure storage available to provide the item to a staff member for secure storage within BF
  - If an everyday item that has been removed purely for safety whilst on site this can be returned to the customer at the end of the session
  - If a clear weapon has been removed this cannot be returned to the customer and needs to be handed to the local Police station for later collection by the customer
- If the customer refuses to secure the item safely they may be refused access to the site including start of any planned activity or programme
- The name of the customer being given to any authority (see data protection policy)
- Customer not able to return to BF for further events
- In some occasions BF staff may feel necessary and appropriate to contact the police

**Any Core service user who has or is reasonably suspected to have in their possession a weapon or item that could be used as a weapon will be subject, at BF staff discretion, to any or all of the following:**

- Refused access to the site including start of any planned activity or programme
- Asked to hand over the weapon to a member of staff for secure storage (this item cannot then be returned to the core service user, see 'confiscated items' below)

- Asked to provide personal belongings to be searched for any concealed weapons
- BF staff to deliver Information, Advice and Guidance including signposting opportunities
- BF staff contacting the referring organisation
- The name of the client being given to any authority (see data protection policy)
- Being removed from the site
- Ongoing incidents may lead to exclusion from BFA provision
- In some occasions BF staff may feel necessary and appropriate to contact the police

**Confiscated items**

If a core service user voluntarily hands over a weapon or item deemed to be a weapon for secure storage, or has any such item confiscated this item cannot be returned to the individual. Any staff returning such an item may be deemed as supplying the weapon.

Voluntarily handed over and confiscated items should be presented to the Programme Coordinator or Duty Manager for secure storage. The core service user should be informed, at the staff member's discretion that this item will not be returned to them by us.

Programme Coordinator or Duty Manager, based on knowledge of individual circumstance of core service user, to contact either parent / legal guardian to advise of incident OR Police 101 number for further guidance. Based on discussion item may be returned to parent / legal guardian OR to local Police station for later collection by parent / legal guardian.

Last update: 05/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: February 2019

## 26. Whistle-blowing Policy

### Policy Overview

This document has been written to comply with the '*Public Interest Disclosure Act 1998*', which was introduced to protect employees who "blow the whistle" about any wrongdoing.

### Aim

This policy offers guidance to staff on the correct procedure for bringing to the attention of management any wrongdoing or suspected wrongdoing (to include safeguarding concerns) which they feel could affect the reputation of BF Adventure, other members of staff, visitors or any other organisation or persons connected with BF Adventure.

### Policy

BF Adventure encourages its staff at all levels, to keep their eyes open and to raise any concerns they have to demonstrate and ensure good practice in all our activities.

Qualifying disclosures are disclosures of information where the worker reasonably believes that one or more of the following matters is either happening, has taken place, or is likely to happen in the future:

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate attempt to conceal any of the above.

This policy outlines

- a commitment to openness and good communications
- ways of raising concerns in the workplace
- support to those raising issues of concern
- that disciplinary action will be taken against anyone who makes malicious allegations

This procedure should not be confused with the **Grievance Procedure** or **Bullying & Harassment Procedure**. The procedure is not a channel for staff to raise matters in relation to their terms & conditions of employment.

### Communications and Openness

Staff have a considerable contribution to make in the development of BF Adventure. Their contribution can be ensured by good communications throughout the organisation, enabling them to raise good ideas and concerns without fear or favour.

### Raising Concerns within the workplace

Any employee who has a concern should raise it first with their line manager or if she/ he is not available, with the **Chief Executive Officer**.

BF Adventure management will support anyone who has reasonable suspicion that malpractice has occurred, is occurring, or is likely to occur. They will be assured confidentiality if they so request, and will be protected from reprisals.

### Malicious allegations

BF Adventure will be equally firm with those employees who make false allegations maliciously. They could leave themselves open to disciplinary action, and even dismissal depending on the circumstances.

### Conclusion

BF Adventure hopes not to need to exercise this policy and will foster a relationship of trust with all staff.

Employees have a clear avenue to correct wrongdoing and thus justify the trust of clients and employees. BF Adventure promises to:

- respect confidentiality
- investigate thoroughly
- provide support, and protection, if necessary
- report back on the outcome of investigations and, if appropriate, on any resultant action that is proposed.

Last update: Feb 2018

Updated by: Adrian Richards

Policy Owner: Adrian Richards

To be reviewed Feb 2019

## i. Behaviour Management

This policy outlines what is considered to be best practice when dealing with incidents relating to challenging behavior that may be expressed by children, young people and adults when in the care of BF Adventure. This is inclusive of times when sessions are being delivered on or off-site and when BF Adventure are facilitating transport to or from a place of education, home or a designated drop off that has been agreed, in advance, by a person or establishment that has the authority to act in loco-parentis.

Whilst this policy has primarily been written with BF Adventure's core services in mind it provides guidance and direction for dealing with instances of challenging behavior regardless of service. There is additional guidance and advice provided in the Behavioural Management Training Manual.

### Aims

1. The aim of this policy is to ensure that children, young people and adults with challenging behaviour are cared for in ways which are sensitive to their needs and to provide safeguards for staff charged with this responsibility. This includes policy and guidance on Restrictive Physical Intervention (RPI) contained within Policy 31.
  - a. To support a strategy for managing children, young people and adults with challenging behaviour in which is consistent with the requirement of the law and the expectations of our staff team and stakeholders.
  - b. To promote positive behaviour in children, young people and adults to enable them to benefit from and enjoy their experience of being at BF adventure.
  - c. To ensure that consequences are used appropriately and as part of a sound management strategy.
  - d. To ensure that the consequences and behaviour management systems utilised take into account the views, wishes and feelings of the children, young people whom are subject to them.
  - e. To place the use of RPI within a wider framework of behaviour management and to ensure that they are used only **as a last resort**.

### Objectives

2. To promote the development of behaviour management strategies including the use of RPI, where challenging behaviour is a regular cause for concern.
  - a. To reaffirm that, children, young people and adults with challenging behaviour are best supported by BF staff when there is a culture of information sharing with parents carers other agencies and professionals.
  - b. To support BF staff to work with children, young people and adults in a way that helps teach positive and more effective ways of coping with stress and anxiety.
  - c. To provide guidance to staff on the use of consequences to ensure they are applied fairly, consistently and support the individual's needs.
  - d. To ensure that all staff have access to training which underpins their approach in the effective management of children, young people and adults.
  - e. To ensure that the use of RPI is conducted as a last resort by trained staff and is of **Maximum care and Minimum force**.
  - f. To ensure that RPI is recorded inline with best practice and stakeholders are notified within time limits.

## Relationship management

3. BF Staff have a responsibility to keep children, young people and adult's safe, so that they neither cause harm to others or themselves. Additionally, staff have the opportunity within their professional relationships to guide children, young people and adult's behaviour in ways which help them manage their own feelings as well as develop consideration for others. Children, young people and adults bring their own values and behaviours to BF and staff play a key role in managing these. The rapport and relationships that are forged between staff and clients are key in addressing issues and supporting change. There are some guiding principles outlined in the Behaviour management training manual.

## Behaviour management

4. When managing challenging behaviour it is important to understand the individual's needs, the situations which may trigger anxiety and what may help escalate their behaviour. At BF Adventure we can create a Relationship Management Plan which can provide all known information about an individual in relation to managing their behaviour. It is recommended that this is undertaken for any individual that expresses themselves by challenging the people around them.
5. People are rarely spontaneously violent. Usually they go through a process of rising anger and aggression, which, if unchecked leads to an outburst. It is important therefore, that if staff are to avoid violent confrontations that they understand the "cycle of aggression" and are able to intervene appropriately in response to signs of mounting anxiety and agitation in children, young people and adults.
6. Staff need to recognise the early stages of a behavioural sequence that is likely to develop into a serious incident (if they do not intervene) and take the necessary steps to prevent further escalation.
7. Where there are signs of anxiety / agitation, staff should attempt to deal with the need, wherever possible. This is often different to the presenting behaviour and there are many de-escalation techniques that may be effective. Below are some suggestions which are detailed in the training manual but this is by no means a full and exhaustive list:
  - a. **Managing the environment**
  - b. **Giving warnings and reminders**
  - c. **Praise**
  - d. **Positive Options**
  - e. **Kick Start:**
  - f. **Redirection**
  - g. **Proximity**
  - h. **Planned ignore and positive attention**
  - i. **Giving commands**
  - j. **Time away (self-regulate)**
8. If these attempts to defuse and de-escalate the challenging behaviour are unsuccessful and there are signs of mounting anger and aggression, then it may be necessary for the staff

responses toward the person to change. This is because as the level of anger rises people become less amenable to rational discussion.

9. In the face of maintaining agitation, moving towards anger and aggression, it is important that as a staff member we remain calm, allow the person more personal space and alert colleagues to the situation. If the person continues to behave aggressively it may be necessary to consider the use of physical interventions (See policy 31.)
10. It is important in the face of mounting anger and aggression please see the training manual for guidance in this area.

## The use of consequences

11. Many people equate the use of consequence with punishment. This is a mistake and it is essential that staff bear in mind at all times that punishment has no place in the care of children, young people and adults. Rather, consequence should be seen as an aid to promoting change in children and young people through confronting them with the consequences of their actions and providing an incentive to change their behaviour.
12. When consequences are used, staff need to ensure they are proportionate and appropriate to the behaviour under consideration and its circumstances. There should be a clear and logical link between action and consequence and relevant to the age and understanding of the child, young person or adult. Timely- applied as soon as appropriate after the unacceptable behaviour and within a timescale relevant to the service user. Consequence should not be disruptive to other service users and regularly reviewed for effectiveness.

## Permissible consequences

13. At BF Adventure we offer a challenge by choice ethos and work with our service users to co-produce their programme. Programmes can last for just a day or over a period of many weeks. People on programmes which last for a period of two weeks or more complete a "group agreement" or "The Deal" which helps to set boundaries and consequences:
  - a. "The Deal" should be completed as close to the start of a programme as possible. This may be done on the second day of the programme if this is felt to be the best option by the lead instructor.
  - b. "The Deal" and "Group agreement" should be as co-produced as possible
  - c. "The Deal" and "Group agreement" should be pitched at the individuals level of understanding and communication aids should be used where needed.
  - d. "The Deal" and "Group agreement" should be clear in consequences and each individual or group must sign to state their understanding of them.
14. BF staff regularly use warnings, reminders, humour etc... or impose very low level consequences to de-escalate situations. When these are unsuccessful, agreed consequences, listed below can be imposed as part of a wider view on behaviour management:
  - a. **Cessation of activity** - If the safety of the activity is compromised due to behaviour, attitude or group dynamics.

- b. **Time out** - Usually 10 minutes is given although current guidelines suggest that 1 minute for the mental age of a person is optimum up to a maximum of 20 minutes.
- c. **Time out with IAG** - Information Advice and Guidance can be given on specific issues or about behaviour generally. When related to a specific behavioural issue the following approaches can be useful to help a person think about their coping strategies and affect change.
  - i. *Cost Benefit Analysis*
  - ii. *Life Space Interviewing*
- d. **Missing an activity** - This may be a one off activity or a type of activity that poses a risk to the individual or group. For example activities involving standing on the edge of cliffs or offsite activities due to the unpredictable nature of a person's behaviour.
- e. **Return to school or home** - Despite all efforts to re-engage a person it may be necessary for a person to leave the site. This decision is not taken lightly at BF as we aim to be an inclusive service. In this instance the person must be given the rationale by a member of the management team having made all the arrangements for somebody to receive the person.
- f. **Police involvement** - Whilst every effort is made to de-criminalise young people at BF adventure it may be necessary to contact the police either to attend the scene or for advice. Where crimes have been committed advice will be sought.

Last update: Sunday, 11 February 2018

Updated by: Paul Cox

To be reviewed by: December 2016

To be reviewed by: Paul Cox



## ii. Online Safety and Mobile Phone Use Policy

### Policy Overview

This policy applies to all BF Adventure staff, trustees and volunteers. It includes the wider use of technology such as mobile phones, text messaging, emails, social media, digital cameras, webcams, websites and blogs.

This policy provides a mechanism to ensure that children, young people and adults who access services at BF Adventure are kept safe from the risk of abuse and should be read in conjunction with the Safeguarding Policy.

### Contact between staff and service users:

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries. This means that staff and volunteers should:

- Not give personal contact details to children or young people, including their mobile telephone number, blogs or personal websites.
- Not enter into communications through social media sites including, but not limited to, personal Twitter or Facebook accounts, gaming, emails or texting.
- Sensitively refuse clients who trigger a “friends request” through social media sites to personal accounts. Staff and volunteers can instead prompt client to join BF Adventure official site where content is monitored and screened by a nominated member of staff.

### Minimising the risk of harm

Children, young people and vulnerable adults may be at risk of harm through online access to inappropriate images, language and content. Use of social media and online gaming can also lead to risk of exploitation. BF Adventure is committed to keeping children and young people safe; this means that we will apply policies to monitor their access to online content whilst on programme at BF and also to seek opportunities to positively impact on their online activity in their home settings.

BF Adventure will:

- Maintain appropriate filters through internet access on BF Adventure enabled Wi-Fi and ensure any filter anomalies are reported to the appropriate manager
- Prevent access to the provided Wi-Fi through their personal devices unless this access forms part of an educational activity.
- Ensure children and young people have limited access to their mobile devices when on provision at BF Adventure and maintain appropriate supervision of devices during breaks
- Closely supervise clients when they are using IT / internet resources to ensure that clients are not exposed to unsuitable material and that any resources or materials used are age appropriate
- Ensure all access points to computers are password protected.
- Be aware of the indicators of signs of online exploitation or online risk taking behaviours and liaise with the Designated Safeguarding Officer where there are concerns
- Ensure that where young people are taking photographs or film of others consent is gained.
- Seize opportunities to engage children and young people in discussions around safer internet use, consent and appropriate relationships

**Where misuse is discovered or reported:**

- Staff member who discovers the misuse will inform their line manager and/or DSO.
- The risks will be assessed through discussion with staff members and young person/people impacted
- Communication of the incident will be made to referring agency and MARU if appropriate
- An education package may be instigated to support a change in behaviour for the young person and additional support provided
- Where the victim of the online misuse is known to BF Adventure staff, appropriate support packages and referrals will be put in place. This may include referral to CEOP, the police or to the MARU.

Last update: 05/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: Jan 2019

### iii. British Values and the Prevent Agenda Policy

#### Policy Overview

From 1 July 2015 all schools, registered early years childcare providers and registered later years childcare providers are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. ([www.gov.uk](http://www.gov.uk) Prevent Duty Guidance 2015). This policy sets out how BF Adventure will adhere to this duty. This policy should be read in conjunction with the Safeguarding Policy.

#### Definition of terms:

British Values are defined as: *'Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.'* *Mutual respect and tolerance* includes encouraging students to respect other people with particular regard to the protected characteristics of the Equality Act [2010].

Extremism is defined in law as: *'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.'*

From the Counter-terrorism and Security Act 2015 [www.legislation.gov.uk](http://www.legislation.gov.uk)

#### BF Adventure will:

- Not impose own religious or political beliefs on young people and will be respectful of the beliefs of service users.
- Embed fundamental 'British Values' within programme delivery and enable service users to develop positive character traits through this delivery, for example developing resilience, self-esteem and confidence – the very core of BF Adventure's mission.
- Provide a safe space within existing provision for service users to develop their understanding of the world around them, discuss issues that concern them and develop strategies to question and challenge extremist views as appropriate to their age and maturity.
- Remain aware of children, young people and adults who may be vulnerable to radicalisation, are able to identify them and know how to respond to this with proportionality.
- Ensure Co-ordinators and Managers complete the online Prevent Agenda training and use supervision sessions, team meetings and debriefing sessions to cascade the information and keep team members updated on developments.
- Be alert to changes in a child or young person's behaviour or attitude which could indicate that they are in need of help or protection and be evidence of radicalisation.
- Ensure all concerns are discussed with the programme co-ordinator and/or DSO and a referral made to the Channel programme if deemed appropriate.

Last update: 05/01/2018

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To be reviewed by Centre Manager January 2019

<https://bfadventure.sharepoint.com/sites/teamportal/Shared Documents/Policies, Procedures and certification/Policy supporting documents and Archive/policy handbook/2018 policy handbook V1.1.docx>

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: January 2019

## iv. Dealing with a Disclosure or Suspected Abuse Policy

### Policy Overview

This policy applies to all BF Adventure staff, trustees and volunteers. It provides a mechanism to ensure that children, young people and adults who access services at BF Adventure are kept safe from the risk of abuse and should be read in conjunction with the South West Child Protection Procedures and BF Adventure's Safeguarding Policy.

### BF Adventure will:

Ensure all staff, trustees and volunteers have access to appropriate Safeguarding training and support them to participate in this training.

Ensure all staff, trustees and volunteers have access to on-going support to enable them to express any concerns they may experience

Ensure all staff, trustees and volunteers are aware of the role of the Designated Safeguarding Officer and deputies and how to contact them when necessary.

Ensure all information, decisions and actions are recorded on the Podio system and stored securely

### The procedure:

#### Listen, reflect

- Listen to disclosures from a child or vulnerable adult if offered
- Be observant of any unusual physical injuries a child or vulnerable adult may have
- Be observant of situations reported that could be abusive, or cause abuse

#### Report

All concerns must be reported to the Designated Safeguarding Officer (or in their absence a deputy), who will discuss the situation:

- What is the concern?
- How long have you been concerned?
- Who else has concerns?
- What do you think could be happening to the child?
- List a range of possible things that could be happening, rather than jumping to one conclusion. How could you find out whether each of these possibilities is true?
- What information do you have already?
- What have you already done to address your concerns?
- Have you discussed your concerns with the parents and the child or young person?
- If yes, what did they say?

- If no, why not?
- What would be the possible impact on the child?
- Your manager should question you about the reasons for your concerns.

**Action**

The Designated Safeguarding Officer will follow up any concerns using the Local Safeguarding Children's Board procedures which may involve contacting the Early Help Hub, MAAT (Multi Agency Advice Team), MARU (Multi Agency Referral Unit) for children and young people, the Adult Social Care Access Team for Adults or the Police.

The person reporting the concern and the DSO/Deputy DSO will record the information, concerns and actions on Podio using the safeguarding form.

The DSO/Deputy DSO will ensure information and actions taken are shared appropriately with other agencies in line with the Information Sharing and Confidentiality policies

Insert flow chart

## Escalation Guidance

Occasionally situations arise when workers within one agency feel that the decision made by a worker from another agency on a child protection or child in need case is not a safe decision. Disagreements could arise in a number of areas, but are most likely to arise around:

- Levels of need
- Roles and responsibilities
- The need for action
- Communication

The safety of individual children is the paramount consideration in any professional disagreement and any unresolved issues should be addressed with due consideration to the risks that might exist for the child.

All workers should feel able to challenge decision-making and to see this as their right and responsibility in order to promote the best multi-agency safeguarding practice. This policy provides workers with the means to raise concerns they have about decisions made by other professionals or agencies by:

- a) avoiding professional disputes that put children at risk or obscure the focus on the child
- b) resolving the difficulties within and between agencies quickly and openly
- c) identifying problem areas in working together where there is a lack of clarity and to promote the resolution via amendment to protocols and procedures

Effective working together depends on an open approach and honest relationships between agencies. Problem resolution is an integral part of professional co-operation and joint working to safeguard children.

Resolution should be sought within the shortest timescale possible to ensure the child is protected. Disagreements should be resolved at the lowest possible stage however if a child is thought to be at risk of immediate harm discretion should be used as to which stage is initiated.

The stages of the escalation policy can be found at:

<http://www.online-procedures.co.uk/swcpp/procedures/child-protection/escalation-policy/>

Last update: 05/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: January 2019

## v. Allegations or suspicions regarding a member of staff or volunteer

### Policy overview

This policy applies to all staff, volunteers, placement students and trustees that are affiliated to BF Adventure. It also provides a basis for action where a member of BF staff is concerned about the actions of a professional from another organisation. This policy should be read in conjunction with the Safeguarding Policy.

### Types of investigations:

Where there is a complaint against a member of staff there may be three types of investigation:

- A criminal investigation,
- A child and vulnerable adult protection investigation,
- A disciplinary or misconduct investigation.

The results of the police and child and vulnerable adult protection investigation may well influence the disciplinary investigation, but not necessarily.

### Concerns about poor practice:

- If, following consideration, the allegation is clearly about poor practice; the Designated Safeguarding Officer will deal with it as a misconduct, capability or disciplinary issue following the procedures laid out in the BF Adventure staff hand book.
- If the allegation is about poor practice by the Designated Safeguarding Officer, or if the matter has been handled inadequately and concerns remain, it should be reported to the Chief Executive Officer or Trustees' who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

### Concerns about suspected abuse or exploitation by professionals

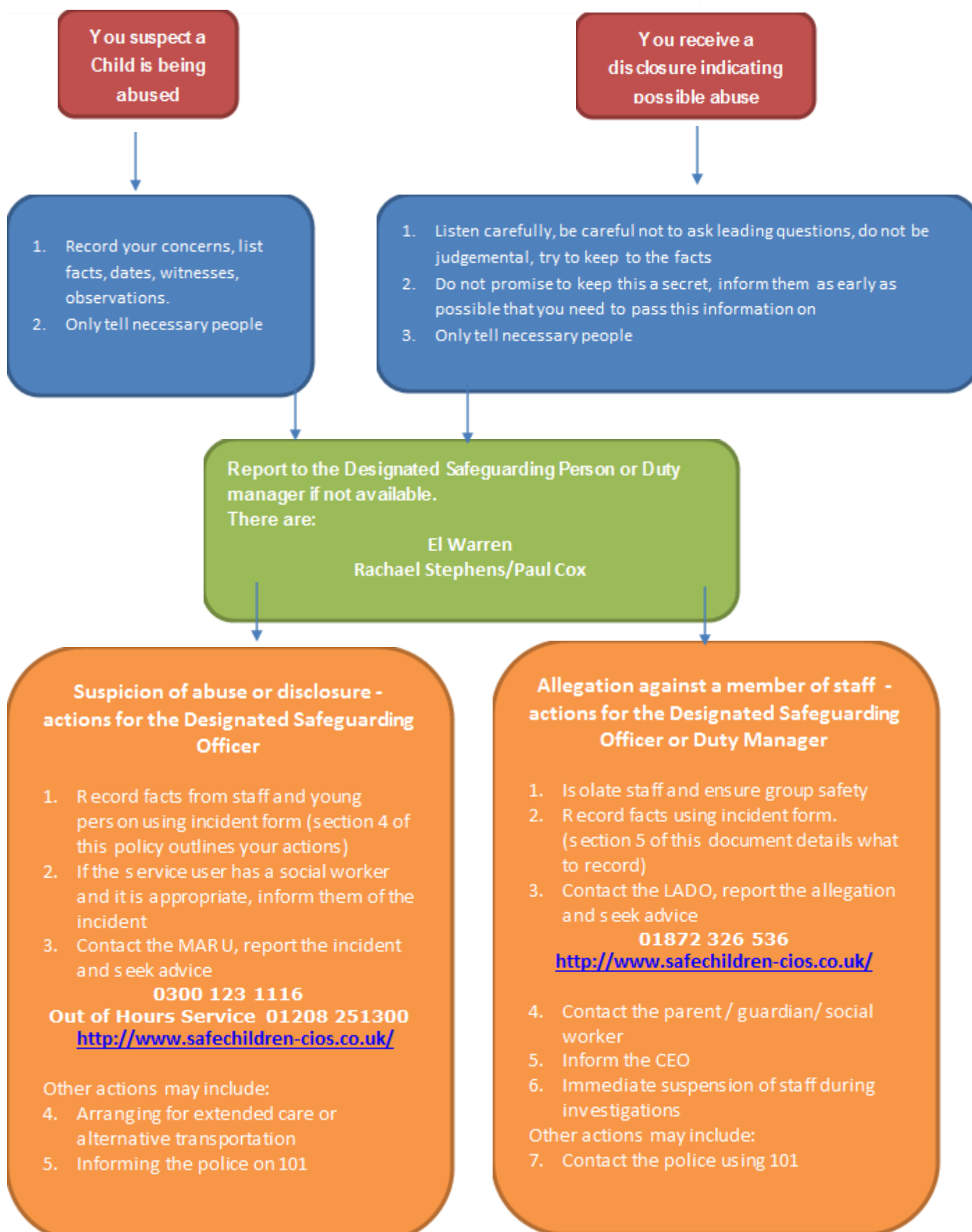
- Any suspicion that a child or vulnerable adult has been abused by either a member of staff or a volunteer or other professional should be reported to the Designated Safeguarding Officer, who will take such steps as considered necessary to ensure the safety of the child or vulnerable adult in question and any other child or vulnerable adult who may be at risk.
- The Designated Safeguarding Officer will refer the allegation to the Local Authority Designated Officer (LADO) following the South West Child Protection procedures online guidance:

<http://www.online-procedures.co.uk/swcpp/contents/allegations-against-staff/>

- The parents or carers of the child or vulnerable adult will be contacted as soon as possible following advice from the Local Authority Designated Officer (LADO).
- If the Designated Safeguarding Officer is the subject of the suspicion/allegation, the report must be made to the Chief Executive Officer or in his/her absence the Trustees.



## Flow for staff with managing suspected abuse or allegations



To be reviewed by Centre Manager January 2019

<https://bfadventure.sharepoint.com/sites/teamportal/Shared Documents/Policies, Procedures and certification/Policy supporting documents and Archive/policy handbook/2018 policy handbook V1.1.docx>

**Confidentiality and information sharing:**

Every effort will be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only. This includes the following people:

- The Designated Safeguarding Officer.
- The Chief Executive Officer
- The parents of the person who is alleged to have been abused
- The person making the allegation.
- Social services/police.
- The alleged abuser (and parents if the alleged abuser is a child or vulnerable adult).

Information will be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

- The Designated Safeguarding Officer will follow the advice of the LADO regarding processes to be followed, for example suspension during investigation.
- Irrespective of the findings of the Social Care or police inquiries BF Adventure will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, BF Adventure must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true. The welfare of the child or vulnerable adult should remain of paramount importance throughout.

Last update: 08/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: February 2019

## vi. One to One Work with Service Users Policy

### Policy Overview

This policy applies to all staff, volunteers, placement students and trustees that are affiliated to BF Adventure. It highlights the risks involved and procedures in place to minimise the risks. This policy should be read in conjunction with the Safeguarding Policy and the Lone Working Policy.

### The risks

At times staff will work with a child or vulnerable adult on a 1:1 basis and can leave staff members and the service user open to additional risks, including but not limited to:

- Risk of allegation by the service user against a member of staff or volunteer
- Risk of an incident that requires immediate first aid to either staff member or service user
- Risk of an incident that requires a physical intervention to keep service users and staff members safe from harm
- The provision of personal care to a service user

### BF Adventure will:

- Ensure a risk assessment and referral information is completed by the service user's referrer and that it is updated in a timely fashion and available to staff members as appropriate
- Endeavour to ensure a volunteer is available to work alongside the instructor to provide additional support to the service user and the member of staff. Where volunteers are unavailable priority will be given to those service users who are deemed to have the highest needs and present the greater risk
- Provide staff with regular supervision, reflective debrief opportunities and team meetings to support and review actions.
- Provide physical intervention training to instructors as appropriate to the level of position and expectation of delivery
- Provide ongoing training as applicable to instructors and volunteers to reduce risks associated with physical contact (fitting harness, support)
- Provide opportunities for staff members and volunteers to complete First Aid training to an appropriate level

### BF Adventure Instructors and Managers will:

- Inform managers where they will be, what activities they will be doing and the time frame of this through the day plan and through conversation
- Carry mobile phones / radio
- Follow the lone worker policy guidelines
- Complete a report at the end of each session highlighting any areas of concern.
- Participate in regular supervision, team meetings and debrief sessions to address low level concerns
- Follow actions as above during transportation of service users and call a designated person once responsibility of the child or vulnerable adult has been handed over to another trusted adult as agreed
- Encourage clients to be independent where possible reducing the need for physical contact; treating clients with dignity and respect and avoiding contact with intimate parts of the body

- Always explain to the client what is about to happen and why in situations where touch is unavoidable, and conduct this activity where they can be seen by others if possible
- Consider alternatives, where it is anticipated that a child might misinterpret any such contact
- Be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact
- Always be prepared to report and explain actions and accept that all physical contact may be open to scrutiny
- Ensure management approval has been gained for administering personal care where it is required and that consent has been gained from the service user and/or parents/carers
- Complete a physical restraint (Team Teach) training course if required to do so by their manager and adhere to the Team Teach methods and guidance with regard to intervention (all staff are issued with their own course booklet). See Behaviour Management Policy
- Use techniques to defuse situation where possible and use minimum force for the shortest period necessary in a situation where restraint is unavoidable
- Record and report as soon as possible after the event using the approved process
- Ensure First Aid qualification is up to date and relevant
- Carry first aid kits whenever they are engaged in client activity
- Complete accident/incident report forms as soon as possible after an accident/incident and hand it to the centre manager or duty manager within 24 hours
- Liaise with management to contact parents or carers of client to inform them of the accident / incident
- Follow the Medication Policy with regards to administering medication

### Proviso

Everyone has a duty of care to keep people around them safe. Therefore in some situations, where a person is at risk of immediate and serious physical harm, it may be necessary for a member of staff who has not been trained in Team Teach to restrain a child, young person or vulnerable adult. The minimum intervention should be carried out to ensure safety and a full investigation into the incident should be instigated as soon as possible.

### Incidents that must be reported/recorded

The following occurrences must be reported and recorded to a coordinator/manager and the DSO. Parents / carers of the child and vulnerable adult will be informed as appropriate:

- Accidental hurt to a service user.
- Distressed behaviour by a service user in any manner.
- If a user appears to be sexually aroused by actions.
- If a service user misunderstands or misinterprets an action.
- New risks apparent to service user or to others
- A service user makes a disclosure or there are signs or indicators of abuse

Last update: 08/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: February 2019

## vii. Use of Multi-Media Policy

### Policy Overview

BF Adventure recognizes that the use of photographs and film is a positive medium to celebrate the success of clients, to promote BF Adventure and to record achievement and provide evidence for accreditation purposes. This policy applies to all staff, volunteers, placement students and trustees that are affiliated to BF Adventure. It highlights the risks involved and procedures in place to minimise the risks. This policy should be read in conjunction with the Safeguarding Policy and GDPR Policy

### The risks:

The inappropriate capture/use of photographic and filmed images can place children, young people and adults in vulnerable situations, particularly when posted on line and open to inappropriate sharing. This increases the risk of harm from perpetrators of abuse.

Children, young people and vulnerable adults may not have full understanding of the risks associated with image capture and sharing and are thus unable to make an informed decision regarding consent

### Procedures:

#### **BF Adventure, employees and volunteers will:**

- Ensure written consent from a parent or guardian for under 18's, giving permission for photographic and filmed images to be taken. This consent must cover the potential use of the image and potential restrictions.
- Ensure an assessment of a vulnerable adult's capacity to understand and consent to their image being captured and used must be made. This assessment should be discussed with the relevant social worker/carer.
- Ensure all staff, volunteers and external providers take into consideration privacy, dignity, safety and wellbeing when considering the use of photographic or filming activity.
- Ensure all children/young people/vulnerable adults being photographed or filmed must be appropriately dressed
- Ensure the photo/film is focused on the activity not the child/young person/vulnerable adult.
- Ensure images represent a broad range of children/young people/vulnerable adults and staff and should avoid producing images in one to one situations with no surrounding content
- Ensure images used for publicity reasons, do not include the child/young person/vulnerable adult name without the express permission of the parent/guardian. A vulnerable adult's capacity to consent will be assessed in discussion with their carer/social worker.
- Ensure staff do not use personal smart phones to capture images of children, young people and vulnerable adults.

- Ensure staff use equipment provided by BF Adventure to capture images. All images must be transferred to the central BF media archive and then deleted from devices to reduce the risk of inappropriate use and storage
- Ensure external freelance instructors and providers comply with the organisation's policy. Failure to do so may cause a cessation of the contract arrangements.
- Ensure all concerns regarding inappropriate or intrusive photography are reported to the appropriate line manager / Designated Safeguarding Officer.
- Failure of BF employees and volunteers to comply with the guidelines within this policy may lead to disciplinary procedures.

Last update: 08/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: February 2019

## viii. Safer Recruitment

### Policy Aim

BF Adventure recognizes that anyone may have the potential to abuse children and vulnerable adults in some way. BF Adventure is committed to ensuring that all reasonable steps are taken to ensure unsuitable people are prevented from working with children and vulnerable adults and that a safer working culture starts with robust recruitment measures.

BF Adventure is committed to equal opportunities throughout all stages of the recruitment process. We aim to have a workforce that represents a variety of backgrounds and cultures and can provide the relevant knowledge, abilities and skills for our organisation.

This policy should be read in conjunction with BF Adventure's Equal Opportunities Policy.

### The purpose of the policy:

- to recruit and select the best people available to join our workforce
- to take all reasonable steps to prevent unsuitable people from joining our organisation
- to recruit, select and manage our staff in a way that complies with legislation designed to combat inequality and discrimination
- to do all we can to achieve and maintain a diverse workforce
- to ensure that our recruitment and selection processes are consistent and transparent
- to ensure candidates are judged to be competent before we make them an offer of a job
- to ensure that new members of staff are given a proper induction.

We recognise that:

- our workforce is our most important resource
- unsuitable individuals sometimes seek out opportunities via employment or volunteering to have contact with children in order to harm them
- some groups face unfair discrimination in the workplace
- children, young people and families benefit from our efforts to recruit and select a skilled and committed workforce from a diverse range of backgrounds
- new staff and volunteers cannot perform their role effectively unless they are inducted properly and receive ongoing support and supervision.

### Legal framework



- Safeguarding Vulnerable Groups Act 2006,
- Protection of Freedoms Act 2012,
- Rehabilitation of Offenders Act 2013,
- Part V of Police Act 1997
- Equality Act 2010.
- Working Together to Safeguard Children 2015

## Pre interview

- All roles require a well defined job description and person specification using a standardized template that identifies key responsibilities, tasks and expected behaviours. All job descriptions and person specifications contain a safeguarding clause
- All roles will be advertised in a range of places, including social media. The template full length advert will contain the following statement *'BF Adventure is committed to safeguarding children and the successful applicant will be required to provide an enhanced DBS disclosure'*
- The following dates should be clear on all adverts:
  - Application deadline
  - Interview date (candidate to be provided at least 1 weeks' notice if they are to be invited to interview)
  - Start date
- All applicants must complete the standard BF Adventure application form. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record.
- BF Adventure will not accept a CV without an application form
- The shortlisting process will involve 3 people, 2 of which need to be managers. Shortlisting applications will happen independently and recorded on appropriate documentation. Candidates will be scored against specific criteria identified through the job description and person specification. Any discrepancies, gaps in the application or inconsistencies will be scrutinized.
- Trustees are not required to complete a formal application

## Interview

All staff will be required to undergo an application and interview process, carried out to acceptable protocol and recommendations:

- A BF Adventure Designated Safeguarding Officer should be present in the interview process either at the shortlisting or interview stage

- A check will be made that the application form has been completed in full (including sections on criminal records and self-disclosures).
- Specific mention will be made on the interview paper regarding the candidate's suitability to work with young people and vulnerable adults and if they have previous convictions, investigations and or allegations made against them
- 2 managers will be present at the formal interview.
- Each interviewer should have prepared for them a candidate pack for each candidate containing the following:
  - Interview questions and score sheet
  - Candidate application (and CV if available)
- Where a candidate is known to an interviewer this must be declared by the interviewer and an assessment will be made to ensure the suitability of that person to conduct the interview. An additional interviewer may be included on the panel to ensure equality.
- All interviews for positions that involve direct face to face work with service users will include a question on safeguarding children and young people and a question or exercise that draws out their motivation for applying for the role
- Interviews will be commensurate with the position applied for; practical tasks will be assessed for those jobs that require practical skills. Candidates that are applying for a role that requires communication skills will be asked to prepare a presentation.
- All candidates will undertake the same selection process.
- The assessment must be completed, and decisions recorded, by the panel separately for fairness and consistency.
- Only those that meet essential criteria will progress to conditional offer.

### Appointment processes

Successful candidates will be informed by letter or email. This can follow a verbal confirmation if necessary. This letter must make it clear that all pre-employment checks should be completed including:

- References
  - DBS checks
  - Qualifications have been verified
- The candidate will be informed that they will not be able to start work with children and young people until all vetting processes are completed
- All unsuccessful candidates details will be kept for 6 months then destroyed
- Overseas checks are required when a person has lived/worked abroad for a period of 3 months or more during the last 5 years. In circumstances where BF Adventure is prevented,

for reasons outside of their control, from obtaining the necessary overseas checks then BF Adventure will contact the Council's HR Safeguarding Team for further guidance

- Two references will be requested, including one regarding previous work with child and vulnerable adults (if possible, i.e. apprentice may not have had work involving working with children).
- All references will be requested using the standardised "Reference Request" form. This form includes information pertaining to:
  - job performance history
  - conduct including performance management issues
  - disciplinary investigations and proven offences
  - concerns the referee may have for work with children and young people
  - skills and experience
  - behaviours and attributes in relation to the role
- References will be kept in the candidate's personal file and noted on the candidate checklist form.
- An enhanced DBS check will be completed, or portable DBS check completed, for more information on the DBS please see the section 'DBS checks'
- The successful candidate's identity will be checked using the same evidence as used in the DBS checks (Passport / driving license) this is to be noted on the candidate checklist form
- The successful candidate's qualifications should be substantiated.
- Trustees are not required to complete a formal interview process, but are required to provide two references and to complete an enhanced DBS check. All Trustees have Job Descriptions related to specific or general roles on the Board.

## Induction

All employees, Trustees and volunteers should receive formal induction that includes:

- Clarification of job requirements and responsibilities.
  - Safeguarding Policy and Procedures, Normal Operating Procedures, Policy Handbook and BF Staff Handbook are issued (through hard copy or intranet) and training needs are identified.
  - Volunteers will attend a "taster day" where their suitability will be observed and feedback given by staff to the Volunteer Manager.
  - All staff, Trustees and volunteers are subject to a one month probation period

## Training

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to provide a safer environment to young people and vulnerable adults.

BF Adventure will provide the following mandatory safeguarding training as a minimum:

- Recognising signs of abuse - reading of safeguarding policy and review with line manager

- Appropriate response for suspected abuse or in the event of a disclosure - reading of safeguarding policy and review with line manager
- What action to take for suspected abuse or in the event of a disclosure – reading of the safeguarding policy and review with line manager
- Whistle blowing policy – reading of the whistle blowing policy and review with line manager
- All core delivery staff will receive yearly safeguarding update training as part of the staff training week. Core staff at Level 4 and above will ensure they achieve Level 3 Multi-Agency Safeguarding Training
- All core delivery staff will receive regular supervision and annual/mid-term performance appraisals during which safeguarding issues and training needs are discussed and acted upon. Volunteers participate in supervision sessions in correlation to the hours that they work for the organization.

## DBS Checks

### Policy Statement

An enhanced DBS will be undertaken for all new employed staff, trustees and volunteers. All roles at BF Adventure provide post holders with direct access to children, young people and vulnerable adults

BF Adventure offers of employment or engagement of staff, Trustees and volunteers are subject to receipt of a clear DBS search or in the case where there is notification on a returned DBS, it will be the decision of the Centre Manager, CEO and a trustee. This decision will be measured based on the type of notification contained on the DBS and the type of work expected.

3. We will consider past criminal records on an individual basis and adhere to the DBS Code of Practice and therefore take into account the following considerations:
  - a. Whether the conviction is relevant to the position
  - b. The seriousness of the offence
  - c. The length of time since the offence occurred
  - d. Whether the applicant has a pattern of offending behaviour
  - e. Whether the applicant's circumstances have changed
  - f. The circumstances surrounding the offence and explanation offered by the applicant
4. BF Adventure uses Cornwall Council to process all applications.

5. BF Adventure does not discriminate against any subject of disclosure on the basis of any convictions or other information disclosed.
6. BF Adventure reserve the right to terminate contracts or offers of placement if information is disclosed that poses a risk to services users (see below)
7. If a prospective job holder fails to disclose an unspent conviction prior to a DBS application being undertaken, BFA reserves the right to withdraw a job offer.
8. BF Adventure is unable to offer a position to any individual who has committed certain offences against children or vulnerable adults according to the Protection of Children Act 1999 and Court Services Act 2000 and Safeguarding Vulnerable Groups Act 2006.
9. BF Adventure will ensure that all disclosure information is securely stored under sole control and separate to individual staff files.
10. BF Adventure will accept an existing DBS search for new employees and volunteers (completed within the last 6 months) but only as a temporary measure whilst a new enhanced DBS search is undertaken and only in combination with two positive references. Pending receipt of a new DBS search, the new employee may be allowed to work alongside children and vulnerable adults but only alongside another Instructor.
11. In accordance with the DBS Code of Practice, DBS searches will only be retained after commencement of employment or volunteering, for a period deemed necessary subject to a maximum of 6 months. A record of the DBS certificate number and date of issue will remain permanently on file.

#### **Full Time Staff/Casual Part Time Staff/Volunteers**

12. On receipt of the DBS report, the original will be inspected by the centre manager and the outcome reported to the CEO.
13. All completed DBS disclosures (clear and not clear) will be signed off as 'accepted' or 'not accepted' based on the content / risk. These signed documents will contain the following information:
  - a. Candidate name
  - b. Disclosure reference number
  - c. Date the disclosure was received
  - d. Whether the staff member in question is or is not suitable to work at BF Adventure

e. Action plan, if appropriate

14. All clear checks will be signed by a manager and the CEO
15. Any disclosures containing anomalies or entry content will be reviewed by a minimum of 2 managers and a trustee, an assessment undertaken using the considerations above. Measures may also put in place to manage and reduce risk in certain situations.
16. Any DBS disclosures that indicate that the applicant is barred from working with children and adults will automatically be discounted from working at BF Adventure. If service is broken for a period of more than 3 months then a fresh enhanced DBS check is to be undertaken
17. DBS results will be stored centrally in the DBS folder.
18. DBS checks will be renewed every 3 years until Independent Safeguarding Authority provides new procedures of Disclosure and Barring. This is an additional safeguard introduced by BF Adventure although guidance from the Safeguarding Children Team at Cornwall Council, it is not necessary to undertake any subsequent DBS check.

### Volunteers Specifically

19. Volunteers are referred to BF Adventure from a number of sources.
20. Volunteers who satisfy the requirements of the BF Adventure and following receipt of two “safer recruitment” references will be offered a taster day. Following this, a DBS enhanced check must be carried out.

### Policies remaining in force

21. A person who is barred from working with children or vulnerable adults will be breaking the law if they work or volunteer, or try to work or volunteer with those groups.
22. An organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law.
23. In the event of BF Adventure dismissing or investigating a member of staff or a volunteer because they have, or are suspected to have harmed a child or vulnerable adult, or are suspected to pose a risk we will report the information to the Independent Safeguarding Authority.

Last update: 15/01/2018

Updated by: El Warren

Policy Owner: El Warren

To be reviewed by: February 2019

Normal text

1. Number Text

1.1. Level 1

1.1.1.Level 2

## Sub headings (heading 2)

**Strong**

Last update: Date

Updated by: NAME

Policy Owner: Name

To be reviewed by:DATE