

# The Roseland Centre

## Policy Handbook 2025

### Contributors to date:

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This Policy Document outlines the generic policies applicable throughout The Roseland Centre excluding activity specific policies and specific risk assessments from in-house activity or contracted providers.

It is an open working document and intended to be consistently redefined, reviewed and developed using a broad range of industry guidance and standards, qualified/experienced people and current legislation to date.



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# Part 1) Policy Statement

## Our Health and Safety Policy:

- It is our intention to demonstrate an ongoing and determined commitment to improving health and safety at work throughout our charity organisation and operations.
- We will ensure the health and safety at work of all our people, (staff and participants and any other people who may be affected by our work activities).
- We will comply with the requirements of current health and safety legislation.
- We will endeavour to lead our industry by promoting best practice and guidance of the Health and Safety Executive and other regulatory bodies where applicable.
- This policy reflects our commitment to ensuring that health and safety at work is paramount to the business, and that effective health and safety actively contributes to our success.

**1. AWARENESS:** All our people and stakeholders have an awareness and understanding of health and safety hazards and risks that affect our business.

**1.1 Health and safety policy statement** - Adequate resources will be provided to ensure all our people, the sub-contractors and stakeholders are aware of this policy and committed to its effective implementation.

**1.2 Communication and consultation** - There will be active open communication and consultation between all our people, the sub-contractors and stakeholders. Health and safety will be integrated into our communications, wherever appropriate.

**1.3 Management roles and responsibilities** - Roles and responsibilities for health and safety will be defined, as necessary, within job descriptions or profiles. Senior management will ensure that:

- Adequate resources are provided for health and safety.
- Health and safety is adequately assessed, controlled and monitored.
- Our people are actively involved on matters that affect health and safety.

**1.4 Hazard identification** - We will identify our workplace health and safety hazards. We will inform our people, the sub-contractors and stakeholders, as appropriate, of these workplace hazards. We will require our sub-contractors and stakeholders to identify health and safety hazards that may impact on our work activities.

**2. COMPETENCE:** All our people and stakeholders have the competence to undertake their work with minimum risks to health and safety.

**2.1 Health and safety training** - All our people will be adequately instructed and trained on the health and safety issues that affect them, and the safe working practices that should be followed. We will ensure the health and safety competence of our sub-contractors and stakeholders.

**2.2 Behaviour and culture** – TRC Operations Management and Trustees will demonstrate leadership in health and safety. CM/DCM will undertake centre/site tours to ensure that health and safety issues are identified, assessed and managed. Systems will be in place and people will be empowered to raise health and safety concerns with management.

**2.3 Risk assessment and management** - We will assess the risks associated with health and safety hazards in the workplace. All our people will be informed of the health and safety hazards and risks that affect their work. We will take action to prevent, reduce or control risks to an acceptable level and reduce the potential for incidents and accidents. We will require our subcontractors and stakeholders to identify health and safety risks that may impact on our work activities.

**3. COMPLIANCE:** Our work activities achieve compliance with legislation, and our people are empowered to take action to minimise health and safety risks.

**3.1 Incident investigation** - We will report and investigate accidents, incidents and near misses to drive improvement in our health and safety management. Any lessons learned from such events will be used to take corrective action to prevent recurrences.

**3.2 Measuring performance** - We will actively and openly, review and report on our health and safety performance against published objectives and targets. Improvement plans will be developed to support the delivery of these objectives and targets.

**3.3 Health and safety management system** - We will implement management systems to ensure we:

- Comply with health and safety legislation.
- Continually improve our health and safety performance.

**3.4 Sub-contractor improvement** - We will engage and collaborate with our sub-contractors to ensure their:

- Health and safety capability and competence fulfil our expectations.
- Health and safety performance is monitored and reviewed.
- Work activities have minimal health and safety impacts on our activities.

**4. EXCELLENCE:** Be recognised for excellence in the way we manage health and safety.

**4.1 Developing innovative practices** - We will constantly encourage, develop, review and share “health and safety good practice” both internally and externally.

**4.2 Influencing stakeholders** - We will only work with joint venture partners and clients who are willing to meet and achieve our health and safety expectations. We will engage and influence stakeholders to drive improvements in health and safety.

**4.3 Work-related health** - We will assess our occupational health risks. All our people will be informed of the occupational health risks that affect their work. We will take action to prevent, reduce or control occupational health risks to an acceptable level and reduce the potential for ill health, including assessing all our people’s fitness for work. Health surveillance will be conducted to satisfy health and safety legislation.

**Delivering our policy:** Our policy will be delivered by:

- Generating a culture that does not tolerate threats to health and safety.
- Ensuring the real involvement of all our people, subcontractors and stakeholders.

**Policy review:** This policy has immediate effect and replaces all previous versions. This policy will be reviewed and amended, as necessary.

Signed	Date	Updates	Next Review Date
Paul Lakeman	13/10/23	-	13/10/24
Paul Lakeman	10/10/24	-	10/10/25
Paul Lakeman	15/10/25	-	15/10/26

## Part 2) General Policies

The following policies apply across all aspects of operations at The Roseland Centre.

1. **POLICY UPDATES** – V1 draft started on 04/04/23. Update detail shown at the bottom of each title.
2. **ALLERGENS & DIETRY REQUIREMENTS** – TRC, (The Roseland Centre), is committed to reducing the risk to staff, volunteers, customers and visitors regarding the provision of food and the consumption of allergens in food which could lead to an allergic reaction.

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

- Cereals containing gluten – wheat, rye, barley and oat.
- Crustaceans, (such as prawns, crabs and lobsters).
- Egg.
- Fish.
- Peanuts.
- Tree nuts, (such as almonds, hazelnuts, walnuts, Brazil nuts, cashews, pecans, pistachios and macadamia nuts).
- Milk.
- Soya.
- Soybeans.
- Sesame.
- Celery.
- Mustard.
- Sulphur dioxide/sulphate/sulphites, (at a concentration of more than ten parts per million).
- Lupin, (seeds/flour).
- Molluscs, (such as mussels and oysters).
- Coconut.

### 2.2 TRC monitors five key factors towards the successful management of harmful allergens:

*a) 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.

*b) Good kitchen and service practice* - Working closely with the local EHO, (environmental health officer), to ensure all current legislation is being adhered to.

*c) 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 always sought.
- All food handlers employed/volunteering are trained in all areas of good food hygiene practice.

- TRC operates a “No Nut Policy” across its food preparation areas with particular focus upon all control measures upon occasions when clients with known allergies are upon site.
- All TRC 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.
- Prior to any TRC-led group catering, (or client catering with a known nut sensitive client), a full dynamic check and clean down of all food preparation areas will be conducted and recorded.

d) Effective training -

- Working with both the local EHO and the Food Standards Agency.
- All TRC food handlers hold a basic Level 2 food hygiene certificate with Level 3 being a management team expectation.

e) Good communication –

Staff/volunteers are trained to escalate any concerns a customer may have regarding food intolerance to a TRC team member 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.

**2.3 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. TRC 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 – Lactose-free 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.
- Full-fat 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.

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Paul Lakeman	06/11/25	-	06/11/26

### 3. ANTI-BULLYING

#### Aim

TRC aims to ensure that all service users, staff, trustees, committee members, volunteers and visitors feel safe and secure and are free from bullying behaviour by others. TRC is committed to supporting those who feel victimised and to work with them to address the issue. TRC 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.

TRC will:

- Promote a culture of tolerance towards diversity and challenge behaviours and comments that potentially cause harm to others, with 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, TRC's Confidentiality Policy, Whistle Blowing Policy and Complaints Procedures.
- Ensure that all members of the TRC 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, Child Exploitation and Online Protection website).
- Support service users to access specialist services to meet their identified needs.

#### **3.1 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 has a cumulative impact on the victim and can lead to serious implications.

#### **3.2 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 (e.g. texts/sexts, 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.

### 3.3 Reporting incidents of bullying:

TRC 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 in any form/nature, the Harassment Procedures will be followed.

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/Activity Coordinator/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 TRC Staff, revoking of their service/provision will be considered.

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## 4. COMPLAINTS, COMPLIMENTS & SUGGESTIONS

The Roseland Centre 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:

- TRC aims to provide staff, volunteers, service users and customers with the best possible experience and actively seeks feedback.
- TRC 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.
- If satisfaction is not achieved a written complaint must be received within 14 days of the visit to TRC.

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

### 4.2 Formal complaints:

A formal complaint must be presented in writing to TRC Trustee Chair.

Mainstream/Commercial Customers: Complaints will be responded to within 5 working days.

Service User/Charity Client: The document will be signed by the complainant and the CM/DCM 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 TRC 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.

### 4.3 Appeal/Escalation:

If the complainant is not satisfied, they may appeal in writing to the Trustee Chair within 5 working days, (mark letter Private and Confidential). The matter will then be investigated by a panel of professionals and/or x2 or more Trustee Board/Committee Members who are independent to the initial process. The appeal panel will consider the appeal details 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 TRC 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:

Local Health and Safety Executive 01752 276300

#### 4.4 Monitoring:

TRC 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.

#### 4.5 Compliments:

Compliments, positive news and thank you messages to be shared with the staff team, committee members and trustees at appropriate meetings, as well as other suitable communication and information sharing opportunities. Compliments may also be shared via social media 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, marketing and funding application.

#### 4.6 Suggestions:

Any customer or service user wanting to suggest improving the service or operations will be guided by TRC people to contact the charity Gmail/or the Centre Manager email. Suggestions will be presented at fortnightly strategic committee meetings for consideration by trustees and other committee members. Parties making suggestions will then be informed of outcome of suggestion in writing within 5 days of the strategic committee meeting.

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## 5. COSHH

The COSHH Regulations, ([Control of Substances Hazardous to Health \(COSHH\) - COSHH \(hse.gov.uk\)](https://www.hse.gov.uk/coshh/)) and approved code of practice require employers to evaluate and control the risks which employees and others may be exposed to from hazardous substances at work. It applies to all workplaces and includes any substances, materials, processes or by-products that are hazardous to health e.g., microbiological agents, dusts of any kind in substantial quantities and all chemicals categorised as hazardous to health in any form i.e. solid, liquid, gas or vapour. The health effect of hazardous substances is directly linked to:

- i) The nature of the substances.
- ii) Duration of exposure.
- iii) Quantity exposed to.

### 5.1 Scope of the policy:

This policy applies to all employees as well as those visitors, contractors and members of the public who encounter hazardous substances used at TRC.

### 5.2 What is a substance hazardous to health:

- Chemicals.
- Products containing chemicals.
- Fumes.
- Dusts.
- Vapours.
- Mists.
- Nanotechnology.
- Gases and asphyxiating gases and biological agents (germs). If the packaging displays any of the hazard symbols, then it is classed as a hazardous substance.
- Germs that cause diseases such as leptospirosis or legionnaires disease and germs used in laboratories.

### 5.3 The policy aim:

- Assess the risk to health that may arise from exposure to hazardous substances.
- Establish precautions and control measures needed appropriate to the risk.
- Wherever possible, risks should be eliminated.
- Monitor control measures to ensure they are adhered to and working properly.
- Monitor the extent to which employees are exposed to hazardous substances and carry out health surveillance where necessary.
- Inform, instruct and train employees regarding the hazards, risks and precautions needed.

### 5.4 Responsibilities:

#### Centre Manager -

- Ensuring the effective implementation of this policy.
- Allocating sufficient resources to enable the policy to be delivered.
- Monitoring the overall effectiveness of the policy.

- Ensuring substances hazardous to health are identified and assessments of the associated risks to health are carried out within their service by nominated, appropriately trained, competent people.
- Making sure appropriate resources are available to support safe working practice and consider appropriate control measures.
- Health surveillance is undertaken, as appropriate, in accordance with assessment findings.
- Assessments are reviewed annually or more frequently if circumstances change.
- Informing staff of important updates to policy will be emailed to all users.

Deputy Centre Manager –

- Ensuring the effective implementation of this policy.
- Allocating sufficient resources to enable the policy to be delivered.
- Monitoring the overall effectiveness of the policy.
- Ensuring substances hazardous to health are identified and assessments of the associated risks to health are carried out within their service by nominated, appropriately trained, competent people.
- Making sure appropriate resources are available to support safe working practice and consider appropriate control measures.
- Health surveillance is undertaken, as appropriate, in accordance with assessment findings.
- Assessments are reviewed annually or more frequently if circumstances change.
- Informing staff of important updates to policy will be emailed to all users.

Committee members and trustees -

- Identifying all hazardous substances within their area and recording with a COSHH inventory.
- Ensuring material safety data sheets are available for reference.
- Ensuring that assessments are recorded.
- Supporting the assessment process and its outcome by ensuring that any necessary control measures and / or resource requirement are met.
- Monitoring employee compliance with assessments and identified control measures.
- Ensuring that any untoward incidents involving hazardous substances are reported, investigated and managed appropriately.
- Attending internal training to enable them to undertake their role.
- Reporting any health surveillance requirements to the Centre Manager.

Contractors -

Contractors will be responsible for the materials and chemicals they bring on site and the COSHH risk assessments that are associated. TRC may ask for copies of the contracts policy.

Future Employees -

- Follow the safe system of work identified in the assessments.
- Make full and proper use of control measures including personal protective equipment.
- Report any compliance failures, digressions, defects or concerns to the Centre Manager.
- Report accidents and incidents.
- Attend training as required.
- Inform senior management of any health concerns which could reasonably be attributed to exposure to hazardous substances.

### 5.5 Training for staff to manage substances:

Staff whose job role may entail using certain chemicals will be trained in how to log new substances into the TRC Log. This will include:

- Orientation of the relevant documents.
- Overview of how the system works.
- Training on how to complete a risk assessment.

The training will last for around 15 minutes and can be delivered in person or using an in-house software which will have an assessment module.

### 5.6 Training for employees working with substances hazardous to health:

TRC will provide information and where necessary training for employees who work with substances hazardous to health and keep records of training.

*Information and training will include -*

- What the hazards and risks are.
- What to do if there is an accident (e.g. spillage) or emergency. Staff will be able to:
  1. Access the correct equipment to deal with the emergency (eg a spill), including protective equipment and decontamination products.
  2. Access right procedures to deal with a casualty.
  3. Know right people trained to act.
  4. Where to access information to pass over to the emergency services.
  5. Access the emergency plans.
- How to access safety data sheets COSHH Risk Assessment.

### 5.7 TRC risk assessments for COSHH are as follows:

- All products have their own COSHH data sheet downloaded from the company responsible for producing/selling it.
- Data sheets are collected and updated at suggested intervals, these are stored electronically within the MS365 organisation files with a link available upon request, (SharePoint).
- Risk assessments are carried out by trained and nominated staff. The risk assessments include:
  - a. Product name.
  - b. Date of assessment.
  - c. Who assessed the product.
  - d. What the hazards are.
  - e. Who these effect.
  - f. Control measures.
  - g. What supervision is required.
  - h. What training is necessary.
  - i. Emergency plans.
  - j. Review date.

### 5.8 Control measures:

Control measures must be determined by the level of risk to health and must take into account:

- Elimination and/or use of alternative, less hazardous substances and materials where possible.
- Modification of the use or process to eliminate, isolate or reduce exposure.

- Elimination and/or reduction of numbers of people exposed to the hazardous substance.
- The outcome of any environmental monitoring, as appropriate, which has been undertaken by a competent person.
- The provision, maintenance and use of any control equipment required.
- The use of personal protective equipment (PPE) to reduce or control exposure to hazardous substances/materials. PPE should be regarded as a 'last resort' in providing protection from exposure to substances hazardous to health.
- Managers are responsible for ensuring that PPE, as required, is suitable for its intended purpose, appropriately maintained, cleaned, inspected, stored and replaced as required.

### 5.9 PPE:

All TRC people are required to use PPE provided in accordance with the training they have been given and as illustrated in the product data sheets and risk assessments and report any faults/defects or concerns regarding PPE to their manager.

Unless delegated, the Centre Manager is responsible for ensuring that PPE is suitable for its intended purpose, appropriately maintained, cleaned, inspected, stored and replaced as required.

### 5.10 Purchasing procedures:

- 1) All purchases of COSHH goods and substances must be undertaken in accordance with recognised and agreed procedures. No other purchasing approaches should be adopted.
- 2) Manufacturers and suppliers of substances and materials have a legal duty to supply material safety data sheets for the materials provided. All purchases/ requisitions should include a request to supply data information sheets.
- 3) Trained staff must ensure an assessment has been carried out PRIOR to any use or handling of the substance(s).

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Paul Lakeman	13/10/23	-	13/10/24
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## 6. DATA PROTECTION & GDPR

### 6.1 Purpose:

The Data Protection Act & GDPR has two principal purposes -

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

The cornerstones of the act are the eight data protection principles, which prescribe -

- Guidelines on the information life cycle (creation/acquisition; holding; processing; querying, amending, editing; disclosure or transfer to third parties and destruction, ('the life cycle').
- The purpose for which data is gathered and held.
- Protection rights for data subjects.

This policy has been written to acquaint staff with their duties under the Act & GDPR regulations and to set out the standards expected by TRC in relation to processing of personal data and safeguarding individuals' rights and freedoms.

### 6.2 TRC Staff duties:

- Acquaint themselves with, and abide by, the Data Protection Principles.
- Read and understand this policy document and the TRC Privacy Policy.
- Understand how to conform to the standard expected at any stage in the lifecycle.
- 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.
- Understand what is meant by 'sensitive personal data' and know how to handle such data.
- Contact the TRC Data Protection Officer if in any doubt, and not to jeopardise individuals' rights or risk a contravention of the Act.

### 6.3 The eight data protection principals:

1. Personal data shall be processed fairly and lawfully.
2. 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.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. 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.
8. 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.

## 6.4 Best-practice guidelines for the life-cycle process:

### 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 TRC 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 is being collected, explicit consent is not only best practice, but also mandatory. No more data should be collected than is necessary for the purpose(s) declared.

### Holding / safeguarding / disposal of personal data (see principles 4, 5, 7) -

Data should not be held for longer than is necessary. Guidance for length of retention is set in law. 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 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 using 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).

### Processing of personal data (see principles 1, 2) -

In this 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.

### Disclosures and transfers of personal data (see principles 1, 2, 7, 8) -

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

- Employees of TRC may not disclose any information about clients or other employees, including information as to whether any person is or has been a client or employee of TRC unless they are clear that they have been given authority by TRC to do so. Care should be taken in relation to any posting of personal information on the internet.
- No employee of TRC may provide references to prospective employers or landlords or others without the consent of the individual concerned. It is therefore essential that where TRC is given as a referee, the subject of the reference should provide TRC with the necessary notification and consent.
- No employee may disclose personal data to the police or any other public authority unless that disclosure has been authorised by TRC's Data Protection Officer or Safeguarding Officers.
- Employees of TRC 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).

Transfers - Personal data should not be transferred outside of TRC 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 adequate safeguards have been put in place in consultation with the Data Protection officer; or
- IV. 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).

Destruction of personal data (see principles 5, 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 (unless otherwise directed by funders requirements).

**6.5 Data subjects’ right of access:**

TRC 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, TRC must be given adequate proof that the data subject has given authority to the third party for disclosure.

**6.6 Review:**

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

**6.7 Data protection contacts:**

For general enquiries about the TRC Data Protection Policy and for formal subject access requests under the Act: The Centre Manager, The Roseland Centre, St. Just-in-Roseland, Truro, Cornwall, TR2 5JA, Tel: 07940098860, Email: [centre.manager@theroselandcentre.org](mailto:centre.manager@theroselandcentre.org).

**6.8 Disciplinary consequences of this policy:**

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

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Paul Lakeman	13/10/23	-	13/10/24
Paul Lakeman	10/10/24	-	10/10/25
Paul Lakeman	06/11/25	-	06/11/26

## 7. DOGS ONSITE

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

### 7.1 Dogs on site, the following conditions apply:

- Dogs must be kept under control around and inside TRC.
- Dogs are only allowed in outside areas of TRC, unless they are of a supportive and recognised service to the client, calm and safe in behaviour and do not cause any harm to other users, (support dogs would be for visual impairment, social and emotional support).
- Dogs are not allowed in the kitchen or dining areas at all.
- All dog mess must be cleaned up, double bagged and disposed of suitably.
- Other people’s/users boundaries must be respected if animal interaction is not welcomed.
- TRC reserves the right to request the immediate removal of any problem causing dogs from the site, (at the discretion TRC staff).
- No refund for reduced length stays would be due in result of the above action.

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Paul Lakeman	13/10/23	-	13/10/24
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## 8. ENVIRONMENTAL

The Roseland Centre, (the Charity), recognises the importance of environmental protection and is committed to operating its business responsibly and in fulfilment of its compliance obligations. It is the Charity's declared policy to operate with and to maintain good relations with relevant regulatory bodies.

**8.1 Aims:** It is the Charity's objective to carry out all necessary activities, to protect the environment and to continually improve the Environmental Management System through the implementation of the following:

- Assess and regularly re-assess the environmental effects of the Charity's activities.
- Training of Trustees, Volunteers, Employees and Customers regarding environmental issues.
- Minimise the production of waste.
- Minimise material wastage.
- Minimise energy wastage.
- Promote the use of recyclable and renewable materials.
- Prevent pollution in all its forms.
- Control noise emissions from operations.
- Minimise the risk to the general public and everybody on-site from operations and activities undertaken by the Charity.

**8.2 Trustees & Staff will demonstrate leadership and commitment with respect to the Environmental Management System by:**

- Taking accountability for the effectiveness of the Environmental Management System.
- Ensuring that the Environmental Policy and Environmental Objectives are established and are compatible with the strategic direction and the context of the Charity.
- Ensuring the integration of the Environmental Management System requirements into the Charity's business processes.
- Ensuring that the resources needed for the Environmental Management System are available.
- Communicating the importance of effective environmental management and of conforming to the Environmental Management System requirements.
- Ensuring that the Environmental Management System achieves its intended outcomes.
- Directing and supporting persons to contribute to the effectiveness of the Environmental Management System.
- Promoting continual improvement.
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

The Environmental Policy is communicated to all Employees, Volunteers, customers, external providers, and other interested parties.

**8.3 Activity detailing the above could be for example:**

- Encourage car sharing where possible. We recognise that TRC is a remote site regarding countywide potential custom. TRC is accessible by public transport where possible.
- Source local produce where possible and sustain balanced stock levels to ensure limited deliveries and minimal waste.

- Ensure stationery, office and environmentally friendly cleaning supplies are delivered in bulk orders to minimise supplier journeys.
- Minimise waste by evaluating operations and ensuring they are as efficient as possible.
- Actively promote recycling both internally and amongst our customers.
- Activity encourage composting by providing facilities and signage to encourage this.
- Raise awareness of environmental impacts of our organization and encourage staff and service users to contribute to improved efficiencies.
- Raise awareness amongst our client group of relevant environmental issues affecting local community and encourage them to adopt environmentally friendly practices which they can apply outside of TRC.
- Strive to reduce our carbon footprint.
- Maintain wildlife areas on site as well as providing nesting boxes for bats and birds located in appropriate sites.
- Reinforce message to team and service users to turn off appliances and lights when not in use.
- Meet relevant environmental legislation.
- Regularly monitor and update environmental strategy.

**8.4 Use of pesticides:**

TRC is keen to support and promote a healthy environment for all its people and any form of wildlife where practicable. It strives to understand that due to the history and location of the site it will host varied habitats throughout the seasons. With this in mind, we have a set of guidelines that we are committed to follow:

Bees and rare insects - TRC will always cooperate with local organisations to promote species as far as practicable. 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 with contracted professionals. The use of pesticides to control the size of the species is not permissible at any time unless recommended by contracted professionals.

Vermin (rats and mice) - Due to the serious nature of diseases being transmitted from rats, TRC will use current recommended methods to eliminate any population of rats around the centre.

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Paul Lakeman	13/10/23	-	13/10/24
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## 9. EQUAL OPPORTUNITIES & DISCRIMINATION

### 9.1 Discrimination:

TRC is an equal opportunities charity/employer and is committed to opposing all forms of discrimination, victimization, or harassment in the workplace. It will not tolerate discrimination, victimization or harassment based upon age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, (Protected Characteristics).

### 9.2 Equal Opportunities Policy Statement:

TRC will not tolerate discrimination and operates an active equal opportunity policy. However, we cannot operate to stamp out discrimination unless we are made aware that it 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 employment has finished. In particular:

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 based on 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 employment TRC people will be expected to conduct themselves 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.

### 9.3 The policy below applies to all TRC people:

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

### 9.4 Monitoring:

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

### 9.5 The Protected Characteristics:

TRC will not tolerate discrimination, harassment or victimization 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 of belief and discrimination by association. The protection also extends to discrimination by persons of a religious belief towards a nonbeliever.

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).

### 9.6 The Types of Discrimination:

In a number of areas, the law protects employees and discriminatory conduct or omissions that 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 duties entrusted to you, act in a way that is discriminatory or is harassing or victimizing 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 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.

TRC 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 TRC will take in relation to complaints of harassment.

Please note that TRC 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.
- 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, phones, 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 TRC 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 or volunteers of TRC, for example external trainers, contracted staff, or visitors to TRC. TRC are liable if the harassment has occurred on at least two previous occasions and 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. TRC will not tolerate victimisation.

## **9.7 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 TRC, 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 any other TRC person. Any advice will be confidential and will not be reported to anyone else in TRC without your consent.
- You may take the matter up with your line manager or if you prefer 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 TRC.
- However, if you consider that a criminal offence has been committed (i.e., assault or a sexual offence) you should seek the assistance of the Trustees/Chair Trustee, to make a formal complaint to the police. Where a serious criminal offence is alleged TRC will assist you in whether reconsideration or progress to Stage 2 should be considered before being reported 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 CM/DCM. 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 and non-bias. It is recognized that the complaints may be sensitive and difficult to formulate, and you should seek assistance from your line manager if needed.

### Stage 3: 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.

#### Stage 4: The Decision

Once the investigating officer has carried out this investigation, they will prepare a report.

This will be submitted either to the CM/DCM or to a member of the Board of Trustees 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 a 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 Chair Trustee stating your full grounds of appeal.

#### Stage 5: 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, TRC monitors and keeps records of any complaints to ensure that harassment is being dealt with effectively and eradicated from the workplace.

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## 10. EQUALITY & DIVERSITY, (Service Users/Young People)

As part of the commitment made by TRC 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.

### 10.1 Equal Opportunity and Diversity Policy:

TRC 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

TRC 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.

### 10.2 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 TRC team.

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

### 10.3 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 TRC you can be sure we will support everyone to achieve and reach their potential.

**10.4 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.

**10.5 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.

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Paul Lakeman	13/10/23	-	13/10/24
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## 11. ICT

### 11.1 Introduction:

TRC 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. TRC 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.

### 11.2 Organisation and Provision:

TRC 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 designated office space/room is available with specific intention of enabling TRC management access to a dedicated internet capable PC/laptop in a stable working environment. This room will:
  - a. Have up to 1 desktops/laptop PC's.
  - b. Have a dedicated printer.
  - c. Access to the internet will be controlled to ensure that no inappropriate material can either be viewed or downloaded.
  - d. Have individual, restricted access to the TRC server, OneDrive TBC), so that confidential documents cannot be accessed. Work may be saved by each staff member on a dedicated memory stick.
- TRC will maintain at least 1 working laptop for working away from site and that can be used for presentation purposes. This will:
  - a. Contain password protected profiles limiting access to authorised members of staff.
  - b. Have limited and restricted access that must be authorised by the ICT or Trustee members.
  - c. The ICT manager Trustees will maintain records of all staff usernames and passwords securely and also maintain access to the system as administrators.

### 11.3 Equal Opportunities:

All staff and clients, regardless of gender and ability, where appropriate and within group agreements or school boundaries will have equal access to ICT facilities and will have the opportunity to make the most of their own potential, within this field.

### 11.4 Management and Responsibilities:

ICT responsibilities will fall to a line of TRC people in the form of a problem-solving protocol – If each role cannot remedy the issue, it will be passed to the next group of people/person/s in line. This will currently be:

- a) Centre Manager.
- b) Trustees.

- c) External contracted ICT specialists known to Trustees and Committee members.

This will ensure best fit of solution, hardware and software to both TRC staff and client needs. The Trustees will have overall responsibility for the systems.

### **11.5 Staff Training:**

The Centre 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.

### **11.6 Health and Safety:**

TRC 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.

### **11.7 Data Protection and 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 12 months.
- Sensitive documents and data stored on the TRC server will have access restricted by password or limiting network permissions. This information will only be accessible to staff dependent on need and Trustees.
- 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 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 software or applications from outside TRC should be allowed in machines without permission from the Centre Manager or Trustees.

### **11.8 Social Network Sites:**

- Staff associated to TRC should ensure their social network sites have the privacy settings set so only friends can view the content of their profiles.
- The social network site's terms and conditions must be adhered to at all times 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 TRC and its service users.
- Any equipment that stores data will have its memory securely erased or be destroyed before disposal by TRC.

### 11.9 Cloud Services:

TRC use a number of cloud-based services including Office 365, OneDrive TBC and HallMaster TBC. These systems enable greater working flexibility, allowing access to information during offsite working capability. Users of these systems must take responsibility for the data they access, ensuring passwords are kept secure, PC's are locked and password protected and ensuring any files downloaded are only saved within the Office 365 environment.

### 11.10 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.

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## 12. LONE WORKER

### 12.1 Introduction:

TRC 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.

### 12.2 Information and Training:

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

### 12.3 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/task on their own, the most important things to be certain of are that:

- The lone worker has full knowledge of the hazards and risks to which they are being exposed.
- The lone worker knows what to do if something goes wrong, (procedure/protocol).
- Someone else knows the whereabouts of a lone worker and what they are doing.

### 12.4 Health and Safety Out of Hours and Home Visit Procedure, (TBC):

#### Introduction

TRC has a responsibility and is committed to the health, safety and welfare of the employees, Trustees, Committee Members 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 TRC, 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/CM/DCM/Chair Trustee and Emergency Contact 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. Consequently, an emailing outlining these details and plan must

be sent to above TRC people prior to the activity/visit taking place to create a record and paper trail:

- Name of client.
  - Client's address (or other venue).
  - Clients telephone number if applicable.
  - Telephone number of an Emergency Contact.
  - Time of the appointment and the anticipated finish time.
- 2) At the end of the appointment, you must telephone your Line Manager/CM/DCM/Chair Trustee and Emergency Contact to advise them that the appointment/activity has closed and confirm that you have left the client's home or venue.
  - 3) If you have not contacted the above TRC people 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 above will endeavour to contact you on your home telephone number to ascertain whether you have arrived home safely.
  - 4) If there is no reply from your home telephone number or family members answer for you but have not heard from you, the above TRC people will contact the client to determine your arrival and departure time. If no concrete information transpires from this protocol and you still cannot be located the manager will inform the person you have nominated as your Emergency Contact accordingly.
  - 5) Post this, a decision will be made on action to be taken which can range from repeating the above protocol in part and continuing until a time that contact is made, (or you are physically seen and acknowledged), to a more serious period where the above situation escalates and informing the police/emergency services could be the next action. Informing the emergency services would be a final act of a repeated period of the above contact methods being made. The situation must be handled with a "case by case" understanding with all details and facts being considered.
  - 6) The above record of information will then need to be made available to any emergency services which are therefore involved.

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 TRC person, (Line Manager/CM/DCM/Chair Trustee). In the event of a home visit that raises concerns about the safety of a child, young person or vulnerable adult, the current TRC Safeguarding Policy must be followed.

During weekends there is a limited support structure in place on site due to the working hours of the vast majority of the staff. The risks are increased during onsite activities such as setting up in-house activity at TRC, delivery and packing down where members of TRC staff are taken away from office duties and immediate responsibilities; staff are more vulnerable should they have an accident with regard to immediately seeking support, raising the alarm and obtaining medical treatment. In planning the TRC Operations Calendar needs to be consulted to ensure other staff are available, etc, to safeguard the above risks.

### **12.5 Weekend Work:**

When working onsite at weekends the following procedures must be followed.

- One to two TRC staff/people should be notified that you are onsite.

- Carry mobile phones at all times.
- The weekend activity/residential plan proofread and fully checked by CM/DCM and suitable support put in place if needed.
- If a member of staff arrives unfit/unwell to work the CM/DCM must arrange replacement if not themselves then another recognise member of TRC people who qualifies the role.
- If a member of staff does not arrive for work as expected, then follow the above protocol.
- If a contracted activity service provider does not arrive or provide a booked activity on time, on day, etc, CM/DCM to make instant contact with contracted service provider to make arrangements to delivery albeit late activity or arrange Plan B activities, (in the case of Plan B activities TRC is currently developing an Outdoor Classroom to be open for Spring 2024 that will include in-house, team building based activity and learning that potentially will stand alone as a bookable experience that sits strong alongside the hard skill activity experience of offsite contracted adventure sports - TBC).

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## 13. LEGIONNAIRES

### 13.1 Policy Statement:

TRC 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.

### 13.2 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 Committee Members and Trustees.

### 13.3 Potential Sources of Risk:

#### Hot Water Systems

A schematic of TRC Hot and cold-water systems is available on SharePoint using this link:

**TBC**

Locations of hot water systems: **TBC**

- 1983 Kitchen

#### External Sources

Sources of possible external contamination (sludge, rust, scale, algae, other organic matter and biofilms:

- Water source – currently water is sourced by connection to SWW mains on the west of the site with a meter inspection hole by the front gate.

#### Holding tanks

**TBC**

### 13.4 Management:

Who is potentially at risk:

- Staff.
- Visitors and residential users.
- Volunteers.
- Service Engineers.

#### Managing, preventing and controlling the risks **TBC**

1. Hot water systems set above 60 °C.
2. All taps run for 1 minute 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/busier season.

### 13.5 Record Keeping:

Records will be managed and kept by the CM/DCM, these will include:

- What was checked.
- Who checked it.
- Actions carried out.
- Observations of abnormal, broken or malfunctioning systems are recorded and reported for fixing or replacement action.
- Dates of checks.

### 13.6 Reporting:

Any incidents of legionnaire's disease need to be reported to the CM/DCM using TRC Accident/Incident Form and acted upon/filed accordingly.

This will then be reported using the RIDDOR system to the local authority with 48 hours.

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## 14. SMOKING

**14.1 Aim:** TRC aims to promote and educate healthy living and lifestyles to service users across our entire spectrum of provision and delivery. We understand and respect that specific service users choose to smoke/vape and it is hoped that the following policy supports and provides enough guidance for them to reduce and manage the reduction of smoking enough to participate in activities at TRC in a setting which aims to be completely “smoke free” for all.

This policy refers to all provision provided by TRC. Where reference is made to smoking this includes all vaping products and types of tobacco/cigars, etc.

### 14.2 General:

- TRC will promote itself as a “healthy living through healthy choices” charity and site to all users. Please see current version of the TRC Health is Wealth Statement.
- Signs will be placed at the reception entrances, in rooms and in toilets clearly displaying that TRC are promoting a non-smoking/vaping site.
- Clients making bookings will be made aware at point of booking and in the terms and conditions that TRC promotes a “healthy living through healthy choices” attitude and ethos around lifestyle, diet and mindfulness.
- If staff are handed tobacco/vape products by someone under the current legal age for purchasing, then TRC are not permitted to hand the tobacco/vape product back to the client.
- Resources and support will be made available for the service users and supporting staff to assist with this the understanding of this policy.
- Service users will be supported by staff while at TRC to reduce smoking/vaping with the aim of having no cigarettes/vapes while on provision and aside to this being offered current IAG about the health facts, figures and external support available.
- Smoking offsite from TRC, outside of participated adventure activity/outdoor learning, is actively discouraged by TRC staff/people. Contracted activity providers and supporting service staff members are asked to promote this discouragement and provide all the same support as above where appropriate to the situation.
- Smoking offsite from TRC whilst participating in adventure activity/outdoor learning, (externally contracted or TRC in-house), is not permitted. Contracted activity providers and supporting service staff members are asked to promote this discouragement and provide all the same support as above where appropriate to the situation.
- Outside of adventure activity/outdoor learning delivery whether externally contracted or TRC in-house, the responsibility of the above policy is handed to group leads/supporting staff for attention, (overnight residential), (1630hrs – 0900hrs). If it must take place the only suitable area to smoke is around the Fire Square which is situated in the Green Space near the Permaculture Garden, essentially the EAP Fire Meeting Point.
- No smoking is permitted inside any building onsite at TRC.

### 14.3 Staff:

- All TRC people will be expected to promote the policy and report situations of smoking affecting provision of activity/outdoor learning/volunteer events to CM/DCM should they feel unable to deal with them.
- Any incidents that are worthy of review must be reported on the TRC Accident/Incident Form, saved, filed and reviewed by TRC people for potential action/changes to services, etc.

- Staff will not be allowed to smoke during TRC hours of operation or whilst conducting duties/activity.

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## 15. STAFF USE OF FACILITIES & CENTR

**15.1 Aim:** The aim is to ensure consistent and fair treatment for all in the organisation:

- Staff members must obtain prior written or email authorisation from CM/DCM or chair of Trustees 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 CM/DCM.
- All standard normal operating procedures must be adhered to.

### 15.2 Consumption of Alcohol:

- Moderate consumption is only permissible by clients 18yrs old and over - post activity, throughout down time/evening period within a residential and/or evening booked activity.
- Participants must not have consumed alcohol prior to this moderate consumption, (as a minimum all participants must be under the drink drive limit prior to this).
- It is preferable that children are not present during consumption of alcohol, but schools/groups may have slightly different allowances regarding this.
- Under no circumstance must children, (under the age of 18yrs), consume any amount of alcohol at any time at TRC.
- Special events such as the Christmas party’s and staff celebrations may hold special exceptions, but this needs to be organised through TRC people prior, within respect of the above policy.

### 15.3 Illegal Substances and Drugs:

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

### 15.4 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 repair or replacement, then they should consider not using the equipment.
- The CM/DCM has a sign in and out sheet that needs to be used to create a culture of accountability.

### 15.5 Campfires:

These are only permissible within designated areas, (specifically made fire squares), and all residents/clients/users must follow current the Fire-Craft NOP/RA including managed extinguishment.

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## 16. SUBSTANCE MISUSE

**16.1 Aim:** To state TRC’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.

### 16.2 Policy:

Any Centre 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 TRC 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 TRC for further events or bookings.
- On some occasions TRC staff may feel necessary and appropriate to contact the Police.

Any Service User attending training or an accredited, educational programme who has consumed or is reasonably suspected to have consumed or is believed to be in possession of any substance will be subject, at TRC 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. If it is illegal for the young person to have the substance, then the substance will not be returned to the young person and may be disposed of through suitable means.
- Asked to provide personal belongings to be searched.
- TRC staff to deliver Information, Advice and Guidance including signposting Opportunities.
- TRC 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 TRC provision.
- On some occasions TRC staff may feel necessary and appropriate to contact the Police.

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## 17. SUSTAINABLE DEVELOPMENT

### 17.1 Introduction:

TRC recognises the importance of sustainability which covers the following areas:

- Social (which includes Human Rights, Employment Rights and Governance).
- Environmental.

TRC acknowledges the impact of its own activities on the natural and local environment in which it operates.

TRC is committed to an on-going programme of management and improvement so that its adverse impacts are limited and more positive impacts are developed.

### 17.2 Human Rights:

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

TRC 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. **TBC**

### 17.3 Employment Rights:

TRC will comply with all aspects of current legislation.

TRC has a performance reporting framework which requires that all staff receive a performance-based appraisal once a year, an interim appraisal and individual one to one discussion as and when necessary. **TBC**

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

### 17.4 Governance:

Under direction of the Board of Trustees, TRC operates a Governance Committee which consists of a minimum of x4 Trustees and a Chair.

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.

### 17.5 Environment:

Please refer to TRC's Environmental Policy which can be found within Normal Operating Procedures.

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## 18. THIRD PARTIES

**18.1 Introduction:** This policy is intended to ensure that third party users agree to a safe method of working when operating under/affiliated to or associated with TRC, 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 TRC is not compromised or failed.

Example of third parties are but not limited to:

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

### **18.2 The following conditions must be met before third parties are allowed to operate at TRC:**

#### 1. Insurance

- a. Evidence of public liability Insurance cover must be provided.
- b. This must be equal to TRC's level of cover.
- c. This must be in date and valid.
- d. A copy must be stored in the Third-Party users file in SharePoint.

#### 2. Risk Assessments and evidence of Normal Operating Procedures.

- a. Evidence of a safe working practice must be produced and checked.
- b. The CM or in their absence the DCM must check this to ensure there are no contradictions with the current TRC policies and procedures. Where contradictions arise, TRC policies and procedure take precedence unless otherwise negotiated between both parties. Updates relating to this will be kept on file with reference to both documents and policy contradictions and solutions.
- c. Must be valid and in date.
- d. The quality must be assessed by the CM or in their absence the DCM.
- e. Copies must be placed in the Third-Party Service Provider file in TRC SharePoint.

#### 3. Safeguarding.

- a. When working with TRC service users, clients/visitors and volunteers a DBS check must be carried out in accordance with current UK, national, safeguarding procedures.
- b. TRC will request to seek evidence that this process has taken place prior to involvement.

#### 4. Schemes of work and activity plans.

- a. Where appropriate, these should be checked.
- b. Copies must be placed in the Third-Party Service Provider file.

#### 5. Qualifications and membership.

- a. Qualifications that are relevant should be checked and filed as above.

- b. Where relevant, memberships should be checked and evidenced.
- c. Copies must be saved and filed in the Third-Party Service Provider file.

**6. Service Level Agreement (SLA).**

- a. Agreement to operate to TRC policies (NOP and policy folder), an agreement statement is set into the SLA.
- b. Copies must be placed in the Third-Party Service Provider file.
- c. Conflict of interest must be declared.
- d. Intellectual copyright declared.
- e. Confidentiality maintained – all details kept securely in the Third-Party Service Provider file.

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## 19. SERVICE LEVEL AGREEMENT FOR THIRD PARTY USERS & PROVIDERS

Please refer to the current TRC Service Level Agreement v1.

## 20. LICENSEE SERVICE AGREEMENT FOR THIRD PARTY USERS & PROVIDERS

Please refer to the current TRC Licensee Service Agreement v1.

## 21. WEAPONS

To state TRC 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.

### 21.1 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 TRC 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) TRC 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) TRC 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.

### 21.2 Policy:

TRC will not tolerate possession of any weapon or item used as a weapon. Any TRC 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 TRC 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 is available to handover the item to a staff member for secure storage within TRC.
- If this is 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 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).
- It is at the discretion of TRC management whether a customer who does not comply with the policy is able to return to TRC for further events.
- On some occasions TRC staff may feel it necessary and appropriate to contact the police.

Any young person/service/accredited programme 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 TRC 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.
- TRC staff to deliver Information, Advice and Guidance including signposting opportunities.
- TRC 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 TRC provision.
- On some occasions TRC staff may feel necessary and appropriate to contact the police.
- In all circumstances a safeguarding or incident report form will be completed by the appropriate member of staff and shared with appropriate agencies.

**21.3 Confiscated items:**

If a 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 CM/DCM for secure storage. The service user should be informed, at the staff member's discretion that this item will not be returned to them by us.

The CM/DCM, based on knowledge of individual circumstance of 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.

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## 22. WHISTLE BLOWING

### 22.1 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 within the company/organisation.

### 22.2 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 TRC, other members of staff, visitors or any other organisation or persons connected with TRC.

### 22.3 Policy:

TRC 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 charitable activities and working practice.

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.
- 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.

### 22.4 Communications and Openness:

All staff and TRC people have a considerable contribution to make in the development of TRC.

Their contribution can be ensured by good communications throughout the organisation, enabling them to raise good ideas and concerns without fear or favour.

### 22.5 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 CM/DCM or Chair Trustee.

TRC management and Trustee Board 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.

**22.6 Malicious Allegations:**

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

**22.7 Conclusion:**

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

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

- Respect confidentiality.
- Investigate thoroughly and in a nonbiased approach.
- Provide support, and protection, if necessary.
- Report back on the outcome of investigations and, if appropriate, on any resultant action that is proposed.

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## 23. WORK EXPERIENCE

Please refer to TRC NOP 5.19 Work Experience.

## 24. BEHAVIOUR MANAGEMENT

This policy outlines what is best practice when dealing with incidents relating to challenging behaviour that may be expressed by children, young people and adults when in the care of TRC. This is inclusive of times when sessions are being delivered on or off-site and when TRC 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 TRC's services/young person-centred programmes and training in mind it provides guidance and direction for dealing with instances of challenging behaviour regardless of service or age.

### 24.1 Aims:

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).

- To support a strategy for managing children, young people and adults with challenging behaviour which is consistent with the requirement of the law and the expectations of our staff team and stakeholders.
- To promote positive behaviour in children, young people and adults to enable them to benefit from and enjoy their experience of being at TRC.
- To ensure that consequences are used appropriately and as part of a sound management strategy.
- To ensure that the consequences and behaviour management systems utilised take into account the views, wishes and feelings of the children, young people who are subject to them.

### 24.2 Objectives:

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

### 24.3 Relationship Management:

TRC staff have a responsibility to keep children, young people and adult's safe, so that they neither cause harm to others nor 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 TRC 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.

### 24.4 Behaviour Management:

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 TRC we can create a Relationship Management Plan or Safety 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.

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 can intervene appropriately in response to signs of mounting anxiety and agitation in children, young people and adults.

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.

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 - 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).

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.

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 and/or support of physical interventions.

It is important in the face of mounting anger and aggression to consult official training in de-escalation and RPI or to look towards the support in this from group leaders, teachers and/other staff.

### **The use of Consequences:**

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.

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:**

At TRC 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. When working with groups we complete a Group Agreement which helps to set boundaries and consequences:

- Group Agreement should be completed as close to the start of a programme as possible.
- Group Agreement should be pitched at the individual's level of understanding and communication aids should be used where needed.
- Group Agreement should be clear in consequences and each individual or group must sign to state their understanding of them.

We discuss less formally the consequences with young people that are on 1:1 provision as the impact of behaviour on other people's education is greatly reduced.

TRC 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:

- Cessation of activity – If the safety of the activity is compromised due to behaviour, attitude or group dynamics.
- 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.
- Time in 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.
- Cost Benefit Analysis.
- Life Space Interviewing.
- 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.
- 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 TRC 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.

- Missing a session – Where we have had repetitive difficulties, and we have exhausted our options of managing the situation we may need time to review provision and put additional measures in place to ensure that we are meeting that persons needs and can be confident in our ability to keep them safe. Sometimes, following a review of provision we may need to change a person’s day or pause provision.
- Pausing provision - Sometimes, following a review of provision we may need to pause provision until the situation changes and it is safe for them to return. This may be due to the dynamics on the day they attend or the person exhibiting a particular behaviour that we feel we are unable to manage safely at the present time.
- Police involvement – Whilst every effort is made to de-criminalise young people at TRC 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.

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Paul Lakeman	06/11/25	-	06/11/26

## 25. RESTRICTIVE PHYSICAL INTERVENTION

Currently the correct training is required to support or take control of any escalation in behaviour management where RPI is required at any level. Training to be provided if necessary for the future – TBC.

## 26. TRC ID BADGES

### 26.7 Why:

There are several reasons why TRC should model itself on schools and colleges and implement a policy requiring all TRC staff/people to wear ID badges at all times, whilst on site/promoting TRC, etc.

#### 1. Enhanced security:

- Identification of authorized personnel: ID badges clearly identify who belongs within the Charity/Centre. This helps deter unauthorized individuals from entering and reduces the risk of potential security breaches.
- Quick identification in emergencies: In case of an emergency (fire, lockdown, etc.), ID badges facilitate quick identification of staff members/TRC people, making it easier to account for everyone and ensure their safety.

#### 2. Improved safety for groups/clients:

- Child protection: In child-focused environments, ID badges help ensure that only authorized personnel are interacting with children. This provides an extra layer of protection against potential abuse or neglect.
- Visitor management: ID badges make it easier to distinguish between staff and visitors. This allows for better control over who is on the premises and helps prevent unauthorized individuals from interacting with groups or clients.

#### 3. Increased accountability:

- Monitoring attendance: ID badges can be used to track staff attendance and ensure that everyone is present and accounted for during their shifts.
- Responsibility for actions: Wearing an ID badge promotes a sense of accountability and professionalism among staff members.

#### 4. Improved communication and collaboration:

- Easy identification: ID badges make it easier for new staff members to identify and interact with each other, fostering a more collaborative and cohesive work environment.
- Building trust: Visible identification can help build trust between staff and groups/clients, as it clearly demonstrates who is authorised to be in the facility.

#### 5. Professionalism and branding:

- Professional image: Wearing ID badges enhances the professional image of the organisation and demonstrates a commitment to safety and security.
- Branding: ID badges can incorporate the organization's logo and branding, promoting the organization's identity and values.

## 27. NEIGHBOURHOOD RELATIONS

### 27.1 Community Engagement & Communication:

Our ongoing relationship with our immediate neighbourhood and the direct, local impact from various Charity/Centre movements, is very important to all TRC people and continues to be a developing and changeable policy. The following detail stands as a platform to develop this dynamic understanding and in turn could influence or alter certain operations and future initiatives if required.

TRC will endeavour to:

#### Open Communication Channels:

- Establish a dedicated point of contact for community concerns (e.g., a community liaison officer or email address).
- Regularly distribute newsletters or pin updates on the TRC Community Noticeboard providing neighbours with forecasted information about Centre activities and Community initiatives.
- Hold periodic, (6 month/12 month), community meetings or open house events to foster dialogue and address concerns.

### 27.2 Noise Mitigation Policies:

#### Quiet Hours:

- Implement and enforce quiet hours, (e.g., 10:00 PM to 7:00 AM), for all residential areas and outdoor activities.
- Clearly post quiet hour signage throughout the Centre.

#### Noise Control Measures:

- Utilize noise-reducing materials and landscaping in outdoor areas.
- Implement soundproofing measures in indoor activity spaces.
- Limit the use of amplified sound systems and set clear volume limits.
- Control any outdoor events that are planned, making sure they have a noise level assessment conducted, and a plan of noise mitigation put in place.

#### Residential Customer Guidelines:

- Provide residential customers with clear guidelines on noise expectations and responsibilities.
- Address noise complaints promptly and effectively.
- Have a clear process for warnings, and evictions if necessary for people that consistently break the noise policies.

### 27.3 Lighting and Energy Conservation:

#### Exterior Lighting Policy:

- Install motion-sensor or timer-controlled exterior lighting to minimize unnecessary illumination.
- Use downward-directed lighting to reduce light pollution.

- Conduct regular audits of exterior lighting to ensure efficiency and effectiveness.

#### Lights Out Policy:

- Implement a "lights out" policy for all non-essential interior and exterior lighting during specified hours.
- Encourage residents and staff to turn off lights when leaving rooms.

#### Energy Efficiency Initiatives:

- Promote energy conservation practices throughout the Centre.
- Utilize energy-efficient appliances and lighting fixtures.

### **27.4 Curfew and Movement Management:**

#### Curfew Policy:

- Establish and advise a clear curfew for residential customers and participants in outdoor activities.
- Communicate curfew times clearly and consistently.

#### Movement Management:

- Designate specific pathways and entrances for pedestrian and vehicular traffic.
- Implement signage to direct traffic flow and minimize congestion.
- Implement a system of signing in and out for all residents, and visitors.

#### Security Patrols:

- Conduct a security patrol during opening hours to monitor activity and address potential issues.
- Make sure that security patrols should also monitor the immediate streets around the property.

### **27.5 Parking and Traffic Management:**

#### Designated Parking Areas:

- Provide designated parking areas onsite for residents, staff, and visitors.
- Advise that if the Centre parking is full or unavailable, direct all TRC related vehicles to free parking designated by the A3078, (opposite the T-junction joining the B3829).
- Advise no parking on the pavement which is parallel to the Centre's west wall.
- Ensure that no-one is to park directly across the TRC entrance/exit gate unless agreed with TRC Operations Management.

#### Commercial Operations:

- Ensure that commercial operations such as deliveries must be conducted during reasonable hours.
- Make sure delivery vehicles do not obstruct local roadways.

- Make sure clear signage must be in place, for commercial vehicle access.
- Advise that all minibuses and coaches dropping off/picking up groups, are parked in a respectful way, allowing other traffic to pass safely and with ease.
- Ensure that any TRC activity structure/s, third party activity structure/s or the dressing/development/management of any green area is respectful and considerate to the immediate neighbourhood.
- Promote clear communication of any development of TRC activity structure, third party activity structure or green area as soon as possible/required.
- Alter or modify any of the above if it is identified, communicated and agreed that respectfully the movements/activity/development of TRC is directly impacting and/or upsetting our immediate neighbourhood.

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## 28. ABOUT THE ROSELAND CENTRE

### 28.1 TRC:

We are a charity based, community-led, residential centre enabling a range of outdoor educational and cultural experiences for young people, while promoting health, well-being and sustainability for all.

In the summer of 2022, The Roseland Centre charity successfully raised funds to buy the former Cornwall Council outdoor activity and education centre in the village of St. Just-in-Roseland.

Located on the scenic Roseland Peninsula, this former Methodist school was for many years successfully run by Cornwall Outdoors and was used by organisations including The Royal Yachting Association. It is well known as the place where primary school children from around Cornwall and the wider UK came to have safe, enjoyable fun whilst learning to kayak, canoe, climb and sail.

We want to continue in this tradition offering children and adults residential accommodation with access to classes, wellbeing sessions, mentoring and outdoor training with a particular emphasis on water-based activities with local activity providers. The creek in St. Just-in-Roseland is ideally suited to sailing and canoeing sessions, whilst nearby, Summers beach, in St. Mawes, is one of the best and most accommodating places in the UK to learn paddle sports. There are also opportunities for land-based activities including hiking, orienteering and team problem solving.

The Roseland Centre is the perfect place to host a residential course for young people. With a current capacity for thirty children and four teachers staying on site, a fully equipped kitchen, accessible facilities and communal rooms. We aim to be open from Sept 2023 to local schools as well as schools from around Cornwall and beyond.

We're redefining what a community Hub is in Cornwall. We're putting sustainability, environment and community at the heart of everything we do. The Roseland Centre has a long-term goal to inspire expression through and to nature, offering a true sense of place. As a community-inspired charity it is

very important that the local residents do not miss out on opportunities and activities. To this end, the project will ensure that there is direct involvement and impact in promoting well-being through improved access to a range of activities and facilities. This will extend out to bursary funds and local opportunities being made available.

### **28.2 General Site:**

TRC aspire to keep the site as natural as possible to allow the same sense of adventure and connection to nature to continue onsite/after daytime activities/for the benefit of in-house, onsite learning/activities. There is a developing Community Garden which is supported currently by volunteers and TRC people, a Nature Pond which again is currently developing and on the south side of the site is an Outdoor Learning Classroom which has been designed and built by TRC staff providing a multitude of in-house, onsite “softer” activities and outdoor education to take place.

### **28.3 Facilities:**

Apart from the various rooms, kitchen, training room and accommodation blocks, TRC has a range of facilities aimed at making experiences easier to manage which includes access around the site solutions, toilet and shower facilities, accommodation facilities for x34, adaptive equipment for activity and equipment/strategies for moving and transferring people. TRC also has close links to other third-party organisations who can provide specialist equipment to further improve our provision. There are plans to shape a green space area on the north side of the site to accommodate camping options for up to x10. There is a permanent fire-square, (fire-pit), for use by clients, volunteers, (following fire-craft risk assessment/policy).

### **28.4 Weather:**

TRC operates in all weathers where safe to do so and we hope that all users are supported to immerse themselves in experiences as much as possible. We have locations, shelters and can provide basic equipment to make this experience more comfortable. Inside the Centre is a drying room which is used to dry all clothing/cloth-based kit at any time.

### **28.5 Activities**

Currently we are providing all TRC outdoor learning/craft experiences, (soft activities), either onsite or off, within the scope of staff qualifications and Centre NOP's. We direct all paddle sport and archery enquiries, (hard activities), externally to reputable providers locally. With this our goal is to provide a greater sense of adventure, community interest and outdoor learning experience that is built around the needs of the users. Inherently, the risks associated can be vastly different from user to user so activities may need to be adapted, and some may not be suitable simply based around the user's physical and emotional needs but aside to this we aim to be as inclusive and differentiated where possible. TRC may ask for a more detailed medical form to be completed pre-visit so suitable advice and care plans can be set in place if this is required for individual/group participants.

### **28.6 Acceptance of risk statement:**

TRC contracts/hosts and operates activities that involve an element of risk. It is our inherent belief that exposure to risk in a managed and controlled environment educates, develops and provides opportunity for learning, enjoyment and growth and as such hold tremendous value to all participants. TRC has developed a Normal Operating Procedure to mitigate and manage those risks as much as practicable and the current version can be made available upon request.

**28.7 TRC Commitment:**

We aim to manage the risk to an acceptable level through planning, training and monitoring. We will seek and listen to feedback from our users and external professionals. We reserve the right to alter plans and bookings should external factors such as the weather change the level of risk. TRC will listen to the concerns of participants and will only encourage people to participant as far as they feel comfortable.

For people with disabilities, these risks are inherently greater, and we will insist that more detailed risk assessment takes place before users are engaged in activities. Where practical and where identified within the planning stage, TRC will fully support and facilitate a free of charge site visit to look at the venue, programme and activities with the user and family/care professionals to agree a safe plan based around the best needs of the users.

**28.8 Parent/Guardian/Group Leader Commitment:**

All participants that use TRC do so knowing that they enter a risk managed environment or have permission from someone who has parental responsibility to enter this environment and understand that taking part in activities may result in injuries. Participants agree to wilfully disclose information that may increase the risk level of the activity or would lead to a negative experience. Participants also agree to abide to instructions, safety notices and only access parts of the site they have been given express permission to do so. Failure to abide by these may result in major injury and or death.

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## Part 3) Safeguarding

### Contents of this Policy Handbook

To ensure accessibility of all key policies relating to Safeguarding Children, Young People and Vulnerable Adults at Risk TRC has issued this handbook. This document contains:

- Key purpose and overview.
- Confidentiality Policy.
- Dealing with a Disclosure Policy and Procedures.
- Allegations or Suspicions regarding a member of staff, volunteer or other professional.
- 1:1 Work with Service Users Policy.
- Online Safety and Mobile Phone Use Policy.
- Use of Multi-Media Policy.
- British Values and Prevent Policy.
- Safer Recruitment Policy.
- Use of Taxis and Volunteer Drivers Policy.

### Safeguarding Children, Young People and Adults at Risk Key Purpose and Overview

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/contracted by TRC.

#### **1. THE PURPOSE OF THIS POLICY**

- To protect children and young people and adults who receive services from TRC.
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection.
- TRC believes that a child, young person or adult should never experience abuse of any kind.
- TRC has a responsibility to promote the welfare of all children, young people and vulnerable adults and to keep them safe.
- YTC is committed to practice in a way that keeps them safe.

#### **1.1 Legal Framework:**

This policy acknowledges TRC's duty of care to safeguard and promote the welfare of children, young people and adults at risk 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.
- Public Interest Disclosure Act 1998.
- Sexual Offence Act 2003.
- Children Act 2004.
- Safeguarding Vulnerable Groups Act 2006.
- Protection of Freedoms Act 2012.
- "Safe Network Standards"; Safe Network 2013 (endorsed by the CloS LSCB in January 2012).

- Female Genital Mutilation Act 2013.
- Children and Families Act 2014.
- The Care Act 2014.
- SEND code of practice: 0-25 years HM Government 2014.
- “Are They Safe”; Safe Network 2014.
- Information sharing: HM Government 2015.
- “Inspecting Safeguarding in early years, education and skills settings”; Ofsted, August 2015.
- “The Prevent Duty Guidance for England and Wales”; HM Government 2015.
- Modern Slavery Act 2015.
- What to do if you’re worried a child is being abused: Advice for Practitioners 2015.
- The Children and Social Work Act 2017.
- “Working Together to Safeguard Children”; HM Government 2018.
- “Keeping Children Safe in Education”; HM Government 2020;2021.

## 1.2 Definition of Terms:

### Definition of child

The policy and procedures apply to all children and young people up to the age of 18 years, including unborn babies, who access our services. Within the document the terms “children” or “child” refer to all children and young people up to the age of 18 years. The fact that a child has become sixteen years of age, is living independently or is in further education, is in the armed forces, in hospital, or in prison or a young offender’s institution, does not change their status or their entitlement to services or their protection under the Children Act 1989. When a young person reaches the age of 18 the responsibility for their well-being may transfer to adult service providers. Although they cease to be subject of the Safeguarding Children Procedures, some adults may continue to be vulnerable.

### Definition of adult at risk

An adult at risk is defined as any person aged 18 years and over who is, or may be, in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is, or may be, unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

Since the publication of ADSS Best Practice Document: ‘Safeguarding Adults’ (2005), the range of people considered to be vulnerable has been widened to include, people encountering domestic violence, substance misusers and asylum seekers.

## 1.3 Equality Statement:

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

TRC 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.

## 1.4 Commitment to Service Users:

TRC will keep children, young people and adults at risk 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, (TBC).
- Implementing an effective safety policy and related procedures, (this document).
- 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 TRC, in a safe and user centered environment.
- Be confident speaking 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 TRC code of behaviour, the 'TRC Program Agreement' which recognizes the mission and value base of the organization.
- Understand that TRC is committed to working in partnership with children, young people, their parents, carers and other agencies to promote their welfare.

### **1.5 Role of the Designated Safeguarding Officer:**

The core responsibilities of this role include:

- Oversight and management of the TRC Safeguarding Policy and Procedures including ensuring compliance against new legislation, best practice guidance, risk assessment of current policy in light of incidents. (TBC when TRC opens early 2024).
- Undertaking yearly Level 3 Safeguarding training.
- Organising and monitoring the training of the whole team to a level of safeguarding knowledge appropriate to their job role.
- Acting as a first point of contact for any report or suspicion of abuse within the organisation, including where there may be concerns about another professional.
- Providing advice to members of the team who have concerns over the safety of a child or adult at risk.
- Managing reporting, referrals and sharing of information with other agencies, including MARU and the LADO.
- Reporting to the Disclosure and Barring Service if a member of staff has been sacked because they harmed someone, might have harmed someone, or were planning to sack them for either of these reasons but they resigned first.
- Supervision and support to the Deputy Safeguarding Officers.

**1.6 Contact Details:**

Designated Safeguarding Officer / Single Point of Contact:

Name: Mandy Hiscock

Tel: 07940098860

Email: [mandy.hiscock@theroselandcentre.org](mailto:mandy.hiscock@theroselandcentre.org)

Deputy Safeguarding Officers

Name: Paul Lakeman

Email: [cente.manager@theroselandcentre.org](mailto:cente.manager@theroselandcentre.org)

Trustee with Responsibility for Safeguarding

Name: Sarah MacQueen

Email: [skimmacqueen@gmail.com](mailto:skimmacqueen@gmail.com)

**1.7 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 an assessment of risk, determining action, associated with any other significant change or event.

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## 2. CONFIDENTIALITY POLICY

### 2.1 Policy aim:

This policy applies to all staff members, trustees and volunteers at TRC. It outlines TRC'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. TRC 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.

### 2.2 Confidentiality statement:

Personal information shared by young people with their Instructor, Coordinator 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 seeking the consent of the child, young person or parent, unless that the information suggests that a child or vulnerable adult is at risk of serious and/or immediate harm. TRC is committed to safeguarding children, young people and adults and information will be shared in line with the legal guidelines below.

### 2.3 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.

### 2.4 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 TRC 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.

**2.5 Procedures:**

- Service users will be informed at the earliest opportunity and always at the outset of a meeting, interview or IAG session that TRC 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 TRC Safeguarding and Child Protection Procedures will be followed.
- TRC 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 TRC is to be released to any external person or organisation.

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### 3. DEALING WITH DISCLOSURE OR SUSPECTED ABUSE

#### 3.1 Policy overview:

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

TRC 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 who have trained and gain a qualification or certificated assessment in Safeguarding presents the official certificate and allows it to be copied/scanned and kept within staff/volunteer files in relevant TRC SharePoint destination.
- 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/Deputy Safeguarding Officer, (TBC), and how to contact them when necessary.
- Ensure all information, decisions and actions are recorded on SharePoint and stored securely.

#### 3.2 The procedure:

##### Listen, Reflect

Ensure that the child or vulnerable adult is aware of our Confidentiality Policy and Information Sharing Policy.

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 not, why not?
- What would be the possible impact on the child?
- Your manager should question you about the reasons for your concerns.

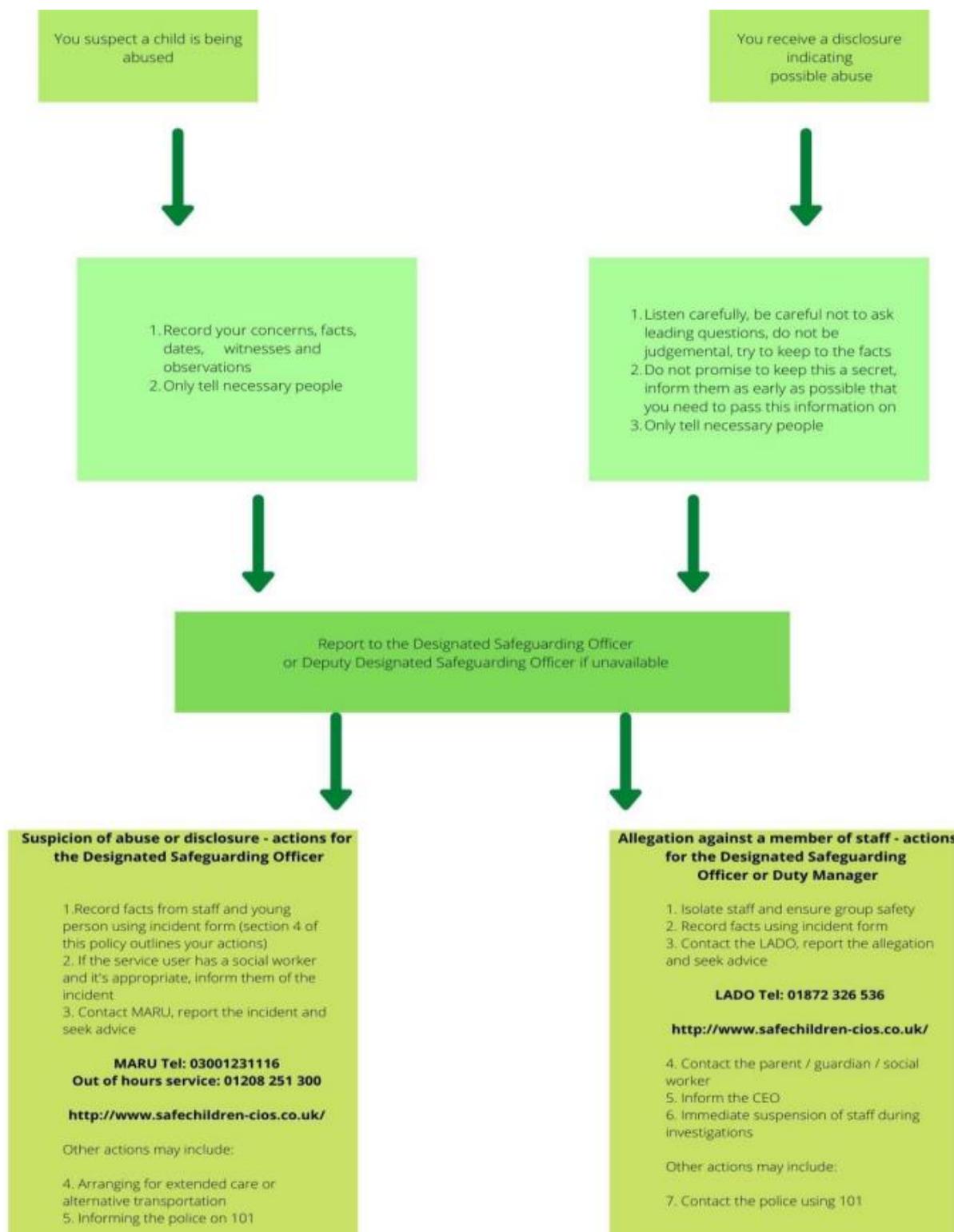
### Action

The Designated Safeguarding Officer will follow up any concerns using the Our Safeguarding Children's Partnership 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 SharePoint using the TRC Accident/Incident 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.

### 3.3 Flow chart for managing suspected abuse or allegations:



### 3.4 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:

1. Avoiding professional disputes that put children at risk or obscure the focus on the child.
2. Resolving the difficulties within and between agencies quickly and openly.
3. 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.

Resolutions 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 Resolving Professional Differences Policy can be found at:

<https://ciossafeguarding.org.uk/scp/p/our-policies-and-procedures/policy>

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Paul Lakeman	10/10/24	-	10/10/25
Paul Lakeman	06/11/25	-	06/11/26

## 4. ALLEGATIONS STAFF/VOLUNTEER/WORK EXPERIENCE

### 4.1 Policy overview:

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

### 4.2 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, child and vulnerable adult protection investigation may well influence the disciplinary investigation, but not necessarily.

### 4.3 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.
- 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 CM/DCM or Trustees' who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

### 4.4 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)
- <https://ciossafeguarding.org.uk/scp/p/professionals/what-you-need-to-know-if-you-have-a-concern-about-a-person-who-works-with-child>
- 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 CM/DCM and the Trustees.

### 4.5 Confidentiality and information sharing – suspected abuse exploitation by professionals:

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 Care/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 Social Care or Police Inquiries, TRC 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, TRC 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.

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## 5. 1:1 WORK

### 5.1 Overview:

This policy applies to all staff, volunteers, placement students and trustees that are affiliated to TRC. 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.

### 5.2 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.

Regarding the provision of personal care to a service user, TRC 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.

TRC Staff 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, 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 situations 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 CM/DCM 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.

### 5.3 Provision:

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 MAPA 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.

### 5.4 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.

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## 6. ONLINE SAFETY/MOBILE PHONE USE

### 6.1 Overview:

This policy applies to all TRC 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 TRC are kept safe from the risk of abuse and should be read in conjunction with the Safeguarding Policy.

### 6.2 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 with children and young people 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 clients to join TRC official site where content is monitored and screened by a nominated member of staff.

Due to the potential for the abuse of power and the development of inappropriate relationships, where an ex-client becomes a volunteer or member of staff a discussion will be held between their previous key support worker/s and the Designated Safeguarding Lead to determine the suitability of sharing personal contact and on-line profiles.

### 6.3 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. TRC 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 TRC and also to seek opportunities to positively impact on their online activity in their home settings.

TRC will:

- Maintain appropriate filters through internet access on TRC enabled WiFi and ensure any filter anomalies are reported to the CM/DCM.
- If filter anomalies are reported TRC will prevent young people from directly accessing IT provision through TRC devices until such time as the filters are deemed safe.
- 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 TRC and maintain appropriate supervision of devices during breaks or downtime/evenings.
- 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.
- Ensure all young people who are accessing support through an online meeting portal (eg, Zoom, Teams, Google Meet), have parental consent in place to include agreement of adherence.

**6.4 Where misuse is discovered or reported:**

Staff members who discover 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 the referring agency and MARU if appropriate.

An education package may be instigated to support a change in behaviour of the young person and additional support provided.

Where the victim of online misuse is known to TRC staff, appropriate support packages and referrals will be put in place. This may include referral to CEOP, the police or to MARU.

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## 7. USE OF MULTI-MEDIA

### 7.1 Overview:

TRC recognises that the use of photographs and film is a positive medium to celebrate the success of clients, to promote TRC, to record achievement and provide evidence for accreditation purposes. This policy applies to all staff, volunteers, placement students and trustees that are affiliated to TRC. 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.

### 7.2 The risks:

The inappropriate capture/use of photographic and filmed images can place children, young people and adults in vulnerable situations, particularly when posted online 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.

### 7.3 Procedures:

TRC, 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. This consent is usually sought at the point of referral through the TRC Participant Guest Form.
- 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 TRC to capture images. All images must be transferred to the central TRC 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/CM/DCM/Designated Safeguarding Office.
- Failure of TRC employees and volunteers to comply with the guidelines within this policy may lead to disciplinary procedures.

- All visitors are required to read and comply with the visitors’ code of conduct on site; this includes not taking images of any service users.

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## 8. BRITISH VALUES & PREVENT AGENDA

### 8.1 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 Counterterrorism 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 TRC will adhere to this duty. This policy should be read in conjunction with the Safeguarding Policy.

### 8.2 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 include 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 Counterterrorism and Security Act 2015 [www.legislation.gov.uk](http://www.legislation.gov.uk) TRC 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 program 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 TRC’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.
- 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 CM/DCM 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.
- Ensure all concerns are discussed with the CM/DCM and/or DSO and a referral made to the Channel Program if deemed appropriate, ([Making a referral to Prevent - GOV.UK \(www.gov.uk\)](http://www.gov.uk)).

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## 9. SAFER RECRUITMENT

### 9.1 Policy aim:

TRC recognises that anyone may have the potential to abuse children and vulnerable adults in some way. TRC 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.

TRC 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 TRC's Equal Opportunities Policy.

### 9.2 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 organization.
- 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 2020.
- Keeping Children Safe in Education 2021.

### 9.3 Pre-interview:

- All roles require a well-defined job description and person specification using a standardized template that identifies key responsibilities, tasks and expected behaviors. 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 ‘TRC 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 TRC application form. The application form will elicit information about an applicant's past and self-disclosure about any criminal record.
- TRC will not accept a CV without an application form.
- The shortlisting process will involve 3 people, 1 of whom will be trained to Level 3 Safeguarding and have attended Safer Recruitment training. 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.

#### 9.4 Interview:

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

- A TRC Designated Safeguarding Officer should be present in the interview process either at the shortlisting or interview stage.
- A check will be made to ensure 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.
- managers will be present at the formal interview.

Each interviewer should have prepared for them a candidate pack for each candidate containing the following:

- Job description.
- 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.

### 9.5 Appointment process:

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 direct work with children and young people until all vetting processes are completed.
- All unsuccessful candidate's 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 TRC is prevented, for reasons outside of their control, from obtaining the necessary overseas checks then TRC 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'.
- All staff will be encouraged to sign up for the DBS Update Service.
- 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.

### 9.6 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 TRC 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.

### **9.7 Training (including existing staff):**

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. Where possible TRC 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.

### **9.8 DBS checks:**

An enhanced DBS will be undertaken for all newly employed staff, trustees and volunteers. All roles at TRC provide postholders with direct access to children, young people and vulnerable adults.

TRC employment or engagement of staff, Trustees and volunteers is 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 CM/DCM and a Trustee. This decision will be measured based on the type of notification contained on the DBS and the type of work expected.

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:

- Whether the conviction is relevant to the position.
- The seriousness of the offence.
- The length of time since the offence occurred.
- Whether the applicant has a pattern of offending behaviour.
- Whether the applicant’s circumstances have changed.
- The circumstances surrounding the offence and explanation offered by the applicant.

TRC does not discriminate against any subject of disclosure on the basis of any convictions or other information disclosed.

TRC reserves the right to terminate contracts or offers of placement if information is disclosed that poses a risk to services users, (see below).

If a prospective job holder fails to disclose an unspent conviction prior to a DBS application being undertaken, TRC reserves the right to withdraw a job offer.

TRC 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.

TRC will ensure that all disclosure information is securely stored under sole control and separated to individual staff files.

TRC 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 member of TRC staff.

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.

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

On receipt of the DBS report, the original will be inspected by the CM/DCM and the outcome reported to the Trustees.

All completed DBS disclosures, (clear/not clear), will be signed off as 'accepted' or 'not accepted' based on the content/risk. This will be recorded on SharePoint and will contain the following information:

- Candidate name.
- Disclosure reference number.
- Date the disclosure was received.
- Whether the staff member in question is or is not suitable to work at TRC.
- Action plan, if appropriate.

All clear checks will be signed by a CM/DCM and Trustee.

Any disclosures containing anomalies or entry content will be reviewed by a minimum of x1 manager and a trustee, an assessment undertaken using the considerations above.

Measures may also be put in place to manage and reduce risk in certain situations.

Any DBS disclosures that indicate that the applicant is barred from working with children and adults will automatically be discounted from working at TRC.

If a service of employment/volunteering/trustee is broken for a period of more than 3 months, then a fresh enhanced DBS check is to be undertaken.

DBS results will be stored centrally in the DBS folder and recorded on SharePoint.

DBS checks will be renewed every 3 years until the Independent Safeguarding Authority provides new procedures of Disclosure and Barring. This is an additional safeguarding process introduced by TRC although guidance from the Safeguarding Children Team at Cornwall Council, it is not necessary to undertake any subsequent DBS check.

### **9.8.2 Volunteers specifically:**

- Volunteers are referred to TRC from a number of sources.

- Volunteers who satisfy the requirements of TRC and following receipt of two “safer recruitment” references will be offered a taster day. Following this, a DBS enhanced check must be carried out.

**9.8.3 Policies remaining in force:**

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.

An organisation which knowingly employs someone who is barred from working with those groups will also be breaking the law.

In the event of TRC dismissing or investigating a member of staff or a volunteer because they have or are suspected of having harmed a child or vulnerable adult, or are suspected to pose a risk, TRC will report the information to the Local Authority Designated Officer and to the Disclosure and Barring Service.

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## 10. USE OF VOLUNTEER TRANSPORT/TAXI

To be created when required.

## 11. RECOGNISED TYPES OF ABUSE

### 11.1 Physical abuse:

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child and vulnerable adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child and vulnerable adult.

In an outdoor education situation, physical abuse might occur when the nature and intensity of activity disregard the capacity of the child's immature and growing body or a vulnerable adult's level of ability and support needs.

### 11.2 Sexual abuse:

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, including prostitution, whether or not the child or vulnerable adult is aware of it happening. The activities may involve physical contact, including penetrative, (e.g. rape, buggery or oral sex), or non-penetrative acts. They may include non-contact activities, such as involving child and vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging child and vulnerable adults to behave in sexually inappropriate ways.

### 11.3 Child sexual exploitation:

'Child sexual exploitation is a form of child abuse. It occurs where anyone under the age of 18 is persuaded, coerced or forced into sexual activity in exchange for, amongst other things, money, drugs/alcohol, gifts, affection or status. Consent is irrelevant, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and may occur online.' (proposed government definition Feb 2016).

The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options.

Grooming and sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour and/or development. However, parents, carers, schoolteachers and practitioners are advised to be alert to the following signs and symptoms:

- Inappropriate sexual or sexualised behaviour.
- Repeat sexually transmitted infections; in girls repeat pregnancy, abortions, miscarriage.
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs).
- Going to hotels or other unusual locations to meet friends.
- Getting in/out of different cars driven by unknown adults.
- Going missing from home or care.
- Having older boyfriends or girlfriends.
- Associating with other young people involved in sexual exploitation.
- Truancy, exclusion, disengagement with school, opting out of education altogether.

- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual).
- Drug or alcohol misuse.
- Getting involved in crime.
- Injuries from physical assault, physical restraint, sexual assault.

Staff and volunteers should be aware of the indicators of signs of online exploitation or online risk-taking behaviours, see section below, and liaise with the Designated Safeguarding Officer where there are concerns.

#### **11.4 Emotional abuse:**

Emotional abuse is the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and adverse effects on the child or vulnerable adult's emotional development. It may involve conveying to the child or vulnerable adults that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age-inappropriate expectations being imposed on child or vulnerable adults.

These may include interactions that are beyond the child or vulnerable adult's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child or vulnerable adult participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing child or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of child or vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, though it may occur alone.

#### **11.5 Neglect:**

Neglect is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child or vulnerable adult's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, and as they grow to adulthood, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child or vulnerable adult from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's or vulnerable adult's basic emotional needs.

Neglect in an outdoor education situation could include a teacher or coach not ensuring children or vulnerable adults were safe or exposing them to undue cold and unmanaged risk knowingly.

#### **11.6 Financial abuse (taken from Social Care Institute for Excellence 2013):**

- Possible indicators of financial or material abuse include:
- Unexplained lack of money or inability to maintain lifestyle.
- Missing personal possessions.
- Unexplained withdrawal of funds from accounts, by any party.
- Power of attorney or lasting power of attorney (LPA) being obtained after the adult at risk has ceased to have mental capacity.
- Failure to register an LPA after the adult at risk has ceased to have mental capacity so that it appears that the adult at risk is continuing to manage their financial affairs.
- The person managing the financial affairs of the adult at risk being evasive or uncooperative.

- The family or others showing unusual interest in the assets of the adult at risk.
- Signs of financial hardship in cases where the adult at risk's financial affairs are being managed by a court appointed deputy, attorney or LPA.
- Money being withheld.
- Recent changes in deeds or title to property.
- Rent arrears and eviction notices.
- A lack of clear financial accounts held by a care home or service.
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the adult at risk.
- Disparity between the adult at risk's living conditions and their financial resources.

### **11.7 Institutional abuse (taken from Social Care Institute for Excellence 2013):**

Institutional abuse is the mistreatment, abuse or neglect of an adult at risk by a regime or individuals. It can take place within settings and services that adults at risk live in or use, and it violates the person's dignity, resulting in a lack of respect for their human rights. Institutional abuse occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice. It can take the form of an organisation failing to respond to or address examples of poor practice brought to their attention. It can take place in day care, care homes, hostels, supported housing, hospitals and sheltered and supported housing. It can be difficult to identify the difference between a poor service and institutional abuse.

Possible Indicators include:

- Lack of flexibility and choice for adults using the service.
- Inadequate staffing levels.
- People being hungry or dehydrated.
- Pervasive inappropriate care and poor standards of care.
- Residents sexually or racially harassing staff or other residents.
- Lack of personal clothing and possessions, including the use of communal toiletries.
- Lack of adequate procedures for the management of finances.
- Lack of adequate procedures for the management of medication.
- Failure to ensure privacy and personal dignity.
- Lack of respect shown to adults using the service (e.g. use of derogatory language and remarks).
- Poor record-keeping and missing documents.
- An ongoing absence of visitors.
- Few social, recreational and educational activities.
- Public discussion of personal matters.
- Absence of individual care plans.

### **11.8 Domestic abuse:**

Domestic abuse is an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. Both men and women can be either perpetrators or victims. In the vast majority of cases, it is experienced by women and is perpetrated by men. Domestic abuse can occur within relationships between younger people.

Domestic abuse can include, but is not limited to, the following:

- Coercive Control, (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence).
- Psychological and/or emotional abuse.
- Physical or sexual abuse.
- Financial or economic abuse.
- Harassment and stalking.
- Online or digital abuse.

Although every situation is unique, there are common factors that link the experience of an abusive relationship. Acknowledging these factors is an important step in preventing and stopping the abuse. This list can help recognise if you, or someone you know, are in an abusive relationship.

They include:

- Destructive criticism and verbal abuse: shouting; mocking; accusing; name calling; verbally threatening.
- Pressure tactics: sulking; threatening to withhold money, disconnecting the phone and internet, taking away or destroying a person's mobile, tablet or laptop, taking the car away, taking the children away; threatening to report to the police, social services or the mental health team unless comply with demands; threatening or attempting self-harm and suicide; withholding or pressuring to use drugs or other substances; lying to friends and family; telling the person that they have no choice in any decisions.
- Disrespect: persistently putting down in front of other people; not listening or responding when talking; interrupting telephone calls; taking money from purse without asking; refusing to help with childcare or housework.
- Breaking trust: lying; withholding information; being jealous; having other relationships; breaking promises and shared agreement.
- Isolation: monitoring or blocking phone calls, e-mails and social media accounts, telling the person where they can and cannot go; preventing from seeing friends and relatives; shutting you in the house.
- Harassment: following; checking up; not allowing any privacy (for example, opening mail, going through laptop, tablet or mobile), repeatedly checking to see who has phoned; embarrassing the person in public; accompanying them everywhere they go.
- Threats: making angry gestures; using physical size to intimidate; shouting down; destroying possessions; breaking things; punching walls; wielding a knife or a gun; threatening to kill or harm the person and the children; threatening to kill or harm family pets; threats of suicide.
- Sexual violence: using force, threats or intimidation to make the person perform sexual acts; having sex with the person when they don't want it; forcing the person to look at pornographic material; constant pressure and harassment into having sex when they don't want to, forcing them to have sex with other people; any degrading treatment related to sexuality or to whether the person is lesbian, bisexual or heterosexual.
- Physical violence: punching; slapping; hitting; biting; pinching; kicking; pulling hair out; pushing; shoving; burning; strangling, pinning down, holding by the neck, restraining.
- Denial: saying the abuse doesn't happen; saying the person caused the abuse; saying they can't control their anger; being publicly gentle and patient; crying and begging for forgiveness; saying it will never happen again.

**11.9 Impact on children and young people:**

Living in a home where domestic abuse happens can have a serious impact on a child or young person’s mental and physical well-being. It can lead to them displaying a range of behaviours – perhaps challenging, violent behaviours, but equally the child could be withdrawn and quiet, develop eating disorders, misuse substances, display attachment seeking behaviours.

A child witnessing domestic abuse is child abuse. TRC staff are committed to listening to children and their unspoken behaviours and to work in partnership with the child and other services to help stop the abuse and to keep the child safe and secure.

If a child talks to us about domestic abuse TRC Staff will:

- Listen carefully to what they're saying.
- Let them know they've done the right thing by telling you.
- Tell them it's not their fault.
- Say you'll take them seriously.
- Don't confront the alleged abuser.
- Explain what you'll do next.
- Report what the child has told you in the relevant time frame to the relevant next process/services.

Signed	Date	Updates	Next Review Date
Paul Lakeman	13/10/23	-	13/10/24
Paul Lakeman	10/10/24	-	10/10/25
Paul Lakeman	06/11/25	-	06/11/26