



# Policy Handbook

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## Change Record

<b>Document</b>	<b>Last signed off by the trustees.</b>
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Snow Closure Policy .....	Jul 2019
Social Media Policy .....	Jul 2019
Violence at Work Policy .....	Jul 2019

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# Policy Introduction

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This document sets out the company's approach to the wellbeing of the staff, students and volunteers, and the continued viability of the company.

Throughout this document, actions and responsibilities are referred to by position within the company. The following list provides the names of the current positions and names.

## Directory of Named Officers

Chief Executive	Viv Colvill
	Founder & Fundraiser
	Approved Cheque Signatory
Chair of Trustees	Pip Steers
General Manager	Katie Gentry
	Approved Cheque Signatory
Administrator (Finance)	Karen Nicholas
	Approved Cheque Signatory
Marketing Manager	Position vacant
Data Manager	Brett Hargraves
Health and Safety Co-ordinator	Pete Higson
Assistant H&S Co-ordinator	Brett Hargraves
Designated Safeguarding Officer	Katie Gentry
	(T) 07599 077 044
	(e) <a href="mailto:katie@freewheelerstheatre.co.uk">katie@freewheelerstheatre.co.uk</a>
Deputy DSO	Viv Colvill
	(T) 07790 348 410
	(e) <a href="mailto:viv@freewheelerstheatre.co.uk">viv@freewheelerstheatre.co.uk</a>
Safeguarding Committee	Karl Newman (Trustee) Lead
	(T) 01483 519 279
	(e) <a href="mailto:karl.newman@surreycc.gov.uk">karl.newman@surreycc.gov.uk</a>
	Pip Steers (Trustee)
	Viv Colvill (Trustee)
Fire Wardens	Peter Higson
	Jacqui Everington

Assistant Fire Wardens	Jay Bristow Brandon McGuire Chris Haydon Caroline Waters
First Aiders	Peter Higson Ashley Mills Jay Bristow
Authorised to Conduct Inductions	Katie Gentry Jacqui Everington Peter Higson Julie Shettle
Treasurer	Bob Colvill Approved Cheque Signatory
Bridge Centre Manager	Tracy Bruton SCC
Workshop delivery	Brandon McGuire Andrea Atkinson Chris Haydon Jacqui Everington Jay Bristow Pete Higson Matt Seaby Tom Gray
Performance Co-ordinator	Pete Higson
Marketing Manager	Position vacant
Keyholders	Chris Haydon Brandon McGuire Jacqui Everington Viv Colvill

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Last updated Jul 2019

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# Associate/Volunteer Selection Policy

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Formal selection process for paid staff, will be carried out in accordance with our Equality and Diversity Policy.

Volunteers will be given an informal interview and offered a Workshop Taster Session prior to acceptance.

Two references will be sought, and the individual will only be allowed to commence regular work or volunteering when these have been returned. In the case of new volunteers, workshop leaders shall be consulted following the Taster Session / initial interview, about the needs of the group and the individual's suitability to fulfil this role.

The following paperwork will be forwarded to the individual by e-mail and/or as a hard copy before they commence regular work or volunteering:

Registration form, Freewheelers Induction Handbook.

If required, an appointment will be made for the individual to undergo a DBS check, and they will be informed of duties that should not be carried out prior to providing a satisfactory DBS certificate.

A full face-to-face induction will be scheduled to take place as soon as possible and within one month.

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END OF POLICY

Next review Jul 2020

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# Business Continuity Plan

## Introduction

This plan provides a framework to follow if the company is faced with an unexpected disruption, to help ensure continuity of services to customers and the protection of our brand and reputation. It provides a basis for planning to ensure our long-term ability to continue trading following a disruptive event.

## Objectives

To ensure that disruptions to our services are kept to a minimum, and that loss of income is avoided whenever possible.

Ensure that we recover from interruptions as quickly as possible.

Minimise the likelihood and impact of interruptions.

## Contacts and Communications.

A regularly updated database of contact information for all staff, volunteers and members of the Company is kept remotely and can be accessed by key staff members from their personal computers. A pyramid system for contacting everyone quickly is maintained.

In the event of a disruption, staff, volunteers and members who need to be contacted urgently will be contacted on their mobile or home phones. In the case of a member who is not able to use or does not have a mobile phone, then their nominated emergency contact will be called (this may be carer or parent).

If contact is less urgent, then email may be used where available and where appropriate. Information that is useful to have in the public domain may be posted on our Facebook page or Twitter feed, or if necessary, we will issue a press release.

## Risks Identified and Assessed

### Temporary loss of access to workshop venue

Probability	Low
Impact	High
Timescale:	Short term
Likely Scenario	Inclement weather conditions, making access dangerous . Damage to access roads/route or to users' travel routes.
Functions Affected	Delivery of workshops and rehearsals, access to equipment.
Action	Contact all staff, volunteers and students to advise of cancellation of workshops. Make provisional plan as to when service will be resumed, and inform all of intentions. When possible, post information on website and via

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	social media. Contact staff, volunteers and students by telephone.
Responsibilities	General Manager or Workshop Leaders if delegated.
Mitigation	Salt kept at the Bridge Centre for gritting car park on icy days to ensure immediate access to building will not be compromised.
Constraints	Ensure that safety of any present staff, volunteers or students is not compromised on site (e.g. if conditions cold, icy etc).
Resources	Staff, database/contact lists, mobile phones, laptops/tablets and/or smartphones with internet access if possible.

<b>Loss of workshop venue</b>
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Probability	Low
Impact	High
Timescale	Medium/long term
Likely Scenario	Flood, fire
Functions Affected	Delivery of workshops.
Action	Workshop Delivery: Contact all staff, volunteers and students to advise of immediate temporary cancellation of workshops. Secure alternative temporary venue(s) as soon as possible. Seek alternative temporary venue(s) for medium/long term as necessary. Update all staff, volunteers and students accordingly. When possible, post information on website and via social media, and issue press release if necessary.
Responsibilities	Contacting staff, volunteers and students by telephone, text or social media. Seeking other venue(s): other admin staff and/or volunteers as available. Updating staff, volunteers and members: admin/marketing staff.
Mitigation	Keep list of potential local alternative venues suitable for short/medium term use, to use as a starting point if needed.
Constraints	Ensure that safety of any present staff, volunteers or students is not compromised on site (e.g. if conditions cold, icy etc).

Resources                      Staff, database/contact lists, mobile phones, laptops/tablets and/or smartphones with internet access if possible.

**Damage/loss of equipment at workshop venue**

Probability	Low
Impact	High
Timescale	Short/medium term
Likely Scenario	Flood, fire, theft.
Functions Affected	Access to equipment (impacts workshop delivery).
Action	Determine exactly what equipment has been lost using the Freewheelers Equipment List (kept at remote location) Identify how this will affect planned work in the short/medium term. Use suppliers/collaborators etc contacts to secure short term loan of equipment . Contact insurance companies accordingly.
Responsibilities	General Manager, Administrator (Financial).
Mitigation	Keep up-to-date inventory of equipment so that we know exactly what equipment has been affected. Ensure equipment is kept in locked cupboards.
Constraints	Ensure that safety of staff/volunteers is not compromised.
Resources	Staff, database/contact lists, mobile phones, laptops/tablets and/or smartphones with internet access if possible.

**Damage/loss of equipment kept off-site**

Probability	Low
Impact	High
Timescale	Short/medium term
Likely Scenario	Flood, fire, theft, accidental damage.
Functions Affected	Access to equipment (impacts workshop delivery, filming, post-production etc).
Action	Determine exactly what equipment has been lost Identify how this will affect planned work in the short/medium term Use suppliers/collaborators etc contacts to secure short term loan of equipment Contact insurance companies accordingly.

Responsibilities	Staff member with whom equipment was being stored
Mitigation	Keep up-to-date inventory of equipment so that we know exactly what equipment has been affected. Equipment taken offsite to be listed in Equipment list along with Serial number.
Constraints	Ensure that safety of staff/volunteers is not compromised.
Resources	Staff, database/contact lists. Equipment list.

**Loss of services at Company registered office or General Manager's office**

Probability	Low
Impact	Low/medium
Timescale	Short term
Likely Scenario	Power cut, flood, fire, damage to phone lines.
Functions Affected	Administration, access to information, telephone line.
Action	Contact staff/volunteers as necessary to help out with any short-term admin tasks as necessary. Divert phone numbers if necessary.
Responsibilities	General Manager, with assistance from other admin staff/volunteers as appropriate. Marketing Manager – full access to database.
Mitigation	Ensure that emails and digitally stored information can be stored securely online so that it can be accessed remotely when necessary.
Constraints	Ensure that safety of staff/volunteers is not compromised.
Resources	Staff, mobile phone.

**Loss of company registered office or general manager's office**

Probability	Low
Impact	High
Timescale	Short/long term
Likely Scenario	Fire, flood
Functions Affected	All administration, access to information, telephone line.

Action	Contact staff/volunteers as necessarily to help out with any short/medium-term admin tasks as necessary . Divert phone number to mobile if possible . Arrange for general enquires to be handled appropriately . Determine what information has been damaged/lost, and locate back-ups of information Determine exactly what equipment has been damaged/lost Identify how this will affect administrative work in the short/medium term contact insurance companies accordingly . Longer term – seek suitable alternative office facility
Responsibilities	General Manager with assistance from other admin staff/volunteers as appropriate . Marketing Manager – full access to database.
Mitigation	Ensure that emails and digitally stored information can be stored securely online so that it is backed-up and can be accessed remotely when necessary.
Constraints	Ensure that safety of staff/volunteers is not compromised.
Resources	Staff, mobile phone, office equipment, internet access.

<b>Loss of information kept at workshop venue</b>
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Probability	Low/medium
Impact	Medium
Timescale	Medium/long term
Likely Scenario	Fire, flood, theft
Functions Affected	Administration/Marketing (archive, display and publicity material).
Action	Identify what material has been lost, and prioritise recovery/replacement as appropriate . Order reprints of photos and/or publicity materials if needed in the short term . Contact insurance companies as appropriate.
Responsibilities	General Manager / Marketing Manager.
Mitigation	Keep digital copies of archived material when possible . Do not purchase and store large quantities of publicity material.
Resources	Staff, equipment to scan and store information, internet access.

**Loss of information kept by freelance staff**

Probability	Low
Impact	Low/medium
Timescale	Medium/long term
Likely Scenario	Fire, flood, theft, accidental damage, burglary.
Functions Affected	Administration/Marketing (database, archive) . Workshop delivery – film footage etc.
Action	Identify what material has been lost, and prioritise recovery/replacement as appropriate. If database has been lost contact developer immediately to disable access to information.
Responsibilities	General Manager / Marketing Manager.
Mitigation	Careful storage and organisation by freelance staff . Film footage to be carefully and safely stored, backed up, archived and catalogued.
Resources	Staff, equipment to scan and store information, internet access, storage (for digital footage etc.)

**Loss of information kept by offsite by electronic means**

Probability	Low
Impact	Medium
Timescale:	Short/medium term
Likely Scenario	Denial of service by storage supplier.
Functions Affected	Company e-mail and information database.
Action	Identify new supplier as soon as possible.
Responsibilities	Data manager.
Mitigation	Alternative secure and confidential backup systems operated.

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## Staff illness

Probability	Low
Impact	Low/medium
Timescale	Short term
Likely Scenario	Illness
Functions Affected	Workshop delivery , administrative functions.
Action	In the case of workshop delivery, most workshops are run by two staff members, and volunteers are present, so can be run if one members of staff is unwell, minimising disruption. This applies to full company workshops, dance workshops, Media Workshops, music workshops and the Youth Theatre.
Responsibilities	General Manager / workshop delivery staff.
Resources	Staff / volunteers

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END OF POLICY

Next review Jul 2020

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# Code of Conduct

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The Company expects all associates and volunteers to:

Treat all Freewheelers members, associates and volunteers with respect, courtesy and consideration of individual needs.

Be aware of our Protection of Vulnerable Adults and Child Protection Policies at all times. Know that associates, volunteers, parents, carers, visitors and audiences may be vulnerable as well as Freewheelers members.

Be aware of all other Policies and take notice of updates which will be circulated by e-mail.

Act and speak in a way that is appropriate for representing the company publicly at all times when working for or talking about Freewheelers. This includes any discussions taking place in publicly viewable forums on the internet.

Take responsibility for one's own words and actions, and for the way in which one reacts to others' words and actions.

Be open and approachable, especially to newcomers.

Dress in a way that is suitable for the activities to be carried out and appropriate for interacting with a wide range of people.

**The Company will not tolerate behaviour such as:**

Making threats

Physical violence

Shouting at others

Swearing at others

Persistent rudeness

Isolating, ignoring or refusing to work with certain people

Telling offensive jokes or name calling

Racist, sexist, homophobic or otherwise discriminatory language

Displaying offensive material such as pornography or sexist / racist cartoons, or the distribution of such material via email / text message or any other format.

Talking about others in a derogatory way, whether or not they are present

Any other forms of harassment or victimisation.

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# Child Safeguarding Policy

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## Statement of Policy

This policy applies to all staff, including the General Manager and Board of Trustees, paid staff, volunteers and sessional workers, members and anyone working on behalf of the Company.

The company maintains a Safeguarding Committee to oversee any issues raised. Because it is impractical to ensure that a committee member is present at all times, all staff members are trained to handle the initial issue, informing the committee as soon as possible. The staff will be reminded of this at the start of each term and further training given if necessary.

## The purpose of this policy:

To protect children and young people who attend and take part in the activities/workshops of the Company.

To provide staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection the Company believes that a child or young person should never experience abuse of any kind.

We have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to practice in a way that protects them. The company recognises its duty of care on the basis of law and guidance that seeks to protect children, namely:

Children Act 1989

United Convention of the Rights of the Child 1991

Data Protection Act 1998

Human Rights Act 1998

Sexual Offences Act 2003

Children Act 2004

Safeguarding Vulnerable Groups Act 2006

Protection of Freedom Acts 2012

Children and Families Act 2014

Special Education Needs and Disability (SEND) Code of Practice 0-25 years

Statutory guidance for organisations which work with and support children and young people who have special educational needs and/or disabilities; HM Government 2014

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015

Working Together to Safeguard Children; HM Government 2015

The Company recognises that abuse can take many forms, whether it be physical abuse, emotional abuse, sexual abuse or neglect; we also recognise that some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependence, communication needs or other issues. The Company is committed to practice that protects children from harm. All members of the Company accept and recognise their responsibilities to develop awareness of the issues which cause children harm.

**The Company believes that:**

The welfare of the child is paramount;

All children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual orientation have a right to equal protection from harm or abuse;

All suspicions and allegations of abuse should be taken seriously and responded to swiftly and appropriately;

All members and employees of the company should be clear on how to respond appropriately;

Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

The Company will seek to keep children and young people safe by:

Ensuring that all children are valued, listened to and treated equally, and with respect and dignity.

Appointing a Designated Safeguarding Officer (DSO) for children and young people, a deputy and a lead board member for safeguarding.

Adopting child protection and safeguarding practices through procedures and a code of conduct for staff and volunteers.

Recruiting staff and volunteers safely, ensuring all necessary checks are made.

Providing effective management for staff and volunteers through supervision, support and training.

Recording and storing information professionally and securely, and sharing information about safeguarding with children, their families, staff and volunteers.

Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately.

Creating and maintaining an anti-bullying environment; ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.

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.

Keeping informed on changes in legislation and policies/best practice for the protection of children. This Policy will be monitored and subject to regular review by the Trustees of the Company.

## **Child Protection Procedures**

### **Disclosure and Barring Service checks**

Enhanced DBS (Disclosure and Barring Service) checks are required for all adults working with or for our Company who carry out regulated activity.

In the case of a blemished record being disclosed among our members a stringent risk assessment must be made of the fitness of that person to continue to work with us, and all actions to mitigate risk must be taken.

### **Responsibilities of the Company**

At the outset of any production/workshop involving children the Company will:

Undertake a risk assessment and monitor risk throughout the production/workshop process.

Identify to parents and staff at the outset the person with responsibility for child protection.

Speak to the children in an age-appropriate way about keeping safe and reporting any worries or concerns.

When working with a school, communicate with the appropriate staff member of a collaborating school to ascertain whether a staff member can be present at all rehearsals/performances, etc., and, if not, confirm that the school accepts the protection provided by the Company's policy.

Ensure the provision of any necessary additional supervision of the children by suitably vetted individuals.

Communicate with the appropriate staff member of a collaborating school to ascertain whether it is the school's or parents' responsibility to collect (or arrange collection of) children after rehearsals or performances.

Know how to get in touch with the Multi Agency Safeguarding Hub in case it needs to report a concern and do this within 24 hours of the concern being raised.

### **Managing sensitive information**

The Company will seek permission from schools or the parents of individuals for use of photographic material featuring children for promotional or other purposes.

The Company's web-based materials and activities will be carefully monitored for inappropriate use.

The Company will ensure confidentiality in order to protect the rights of its members, including the safe handling, storage and disposal of any sensitive information such as criminal record disclosures.

### **Responsibilities of the Individual**

#### **Suspicion of abuse**

If you see or suspect abuse of a child while in the care of the Company, please make this known to the person with responsibility for child protection.

Please make a note for your own records of what you witnessed as well as your response, in case there is follow-up in which you are involved.

## **Disclosure of abuse**

If a child confides in you that abuse has taken place:

Remain calm but do not delay taking action.

Listen carefully to what has been said. Allow the child to tell you at their own pace and ask questions only for clarification.

Don't ask questions that suggest a particular answer.

Don't promise to keep it a secret. Use the first opportunity you have to share the information with the person with responsibility for child protection. Make it clear to the child that you will need to share this information with others. Make it clear that you will only tell the people who need to know and who should be able to help.

Reassure the child that "they did the right thing" in telling someone.

Tell the child what you are going to do next.

Speak immediately to the person with responsibility for child protection. (General Manager) It is that person's responsibility to liaise with the relevant authorities, usually social services or the police. In the event of an allegation being made against that person, speak to the Trustee with responsibility for Child Protection.

As soon as possible after the disclosing conversation, make a note of that was said, using the child's own words. Note the date, time, any names that were involved or mentioned, and who you gave the information to. Make sure you sign and date your record.

Responsibilities of the Designated Safeguarding Officer when suspected abuse is reported:

Listen carefully to what has been said. Allow them to tell you at their own pace and ask questions only for clarification. Don't ask questions that suggest a particular answer. Don't pass judgement.

Make a detailed note of what has been reported.

If there is an immediate concern for a child's safety, dial 999.

Whether or not the concern is judged to be serious, inform the Senior lead for Safeguarding what you are doing about it.

If the suspected victim and/or abuser has a primary carer or social worker that is known to Freewheelers, contact them to discuss your concerns.

If the primary carer / social worker is not known to Freewheelers, or is implicated in the accusations, contact the Single Point of Access (SPA).

Additional responsibilities of the Designated Safeguarding Officer in the case of allegations against Company Members:

If a serious allegation is made against any member of the Company, assisting volunteer, etc., that individual will be suspended immediately until the investigation is concluded. This decision should be made in conjunction with a Trustee.

In all cases, listen carefully to what has been said, and make a detailed note of any conversation.

Whether or not the concern is judged to be serious, inform the Senior lead for Safeguarding what you are doing about it.

If necessary, put temporary measures in place, with reference to the Company Violence at Work Policy, to prevent any further instances occurring.

Seek advice from the Local Area Designated Officer (LADO), which has responsibility for managing allegations against individuals who work with children in Surrey. They must be contacted whenever an allegation of harm to a child is made, regardless of whether a complaint has been lodged. The LADO must be contacted within 24 hours of the concern being raised.

Follow the advice of the LADO, who will advise about all aspects of following up this allegation, including referrals to social care and/or police, managing conversations with company members and families, and what is expected of the organisation.

The above actions will be carried out by the Deputy DSO and Senior lead for Safeguarding in the case of an allegation being made against the DSO.

## **Recording**

In all situations, including those in which the cause of concern arises from a disclosure made in confidence, the details of an allegation or reported incident will be recorded, regardless of whether or not the concerns have been shared with a statutory child protection agency.

An accurate note shall be made of the date and time of the incident or disclosure, the parties involved, what was said or done and by whom, any action taken to investigate the matter, any further action taken, e.g. suspension of an individual, where relevant the reasons why the matter was not referred to a statutory agency, and the name of the persons reporting and to whom it was reported.

The record will be stored securely and shared only with those who need to know about the incident or allegation.

## **Rights and Confidentiality**

If a complaint is made against a member of the Company he or she will be made aware of his rights under the Company's disciplinary procedures.

No matter how you may feel about the accusation, both the alleged abuser and the child who is thought to have been abused have the right to confidentiality under the Data Protection Act 1998. Remember also that any possible criminal investigation could be compromised through inappropriate information being released.

In criminal law the Crown or other prosecuting authority has to prove guilt and the defendant is presumed innocent until proven guilty.

## **Accidents**

To avoid accidents, children and those accompanying them will be advised of 'house rules' regarding health and safety and will be notified of areas that are out of bounds. Children will be advised of the clothing and footwear appropriate to the work that will be undertaken.

If a child is injured while in the care of the Company, first aid will be administered and the injury recorded. This record will be counter-signed by the person with responsibility for child protection.

If a child joins a production with an obvious physical injury a record of this will be made. This record will be counter-signed by the person with responsibility for child protection. This record can be useful if a formal allegation is made later, and will also be a record that the child did not sustain the injury while participating in the production.

## Contact Numbers

LADO Tel: 03002 001 006 - Select opt 4 Safeguarding Children Unit, Select opt 3  
SPA Tel: 03004 709 100 - 9am to 5pm Monday to Friday.  
Tel: 01483 577 898 - Out of hours.

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END OF POLICY

Next review Feb 2020

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# Complaints Procedure

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The Company believes that complaints are best resolved internally

The directors commit to handling any complaints quickly, seriously and confidentially. Complaints about safety or other practical issues can usually be resolved rapidly by talking to a tutor or director. This policy concentrates on complaints against individuals.

## **Confidentiality**

Information about a complaint will only be given to people directly involved.

Everyone will be advised of the need for confidentiality.

Information will be kept securely.

## **Fairness and Impartiality**

Any person complained about has the right to know the details of any complaint against them.

Complaints must be substantiated before any remedial action is taken.

Nobody will be victimised for complaining.

## **What To Do**

### **Option 1 – Self-help**

Try to resolve the problem yourself by talking to the person or people involved. You may find that their actions were unintentional and will stop if you ask.

### **Option 2 – Seeking Help within Freewheelers**

Talk to a tutor or director if you:

Want to discuss your options

Want them to talk confidentially to the person you are complaining about

Want them to bring you together with the other party to conciliate

Need to protect others in the workplace

### **Option 3 – Seeking outside help**

If your complaint cannot be resolved within the Company, you might consult:

Care Managers

The Citizens Advice Bureau

## **How complaints are resolved**

### **By Agreement**

Complaints can be settled by agreement between the people involved.

### **By investigation**

Evidence may be gathered about the complaint.

### **By remedial action**

This may include making an apology, or perhaps by counselling, education or training.

Following this, the situation may be monitored.

In general we regard formal disciplinary procedures as inappropriate to the size and the ethos of our company, and these will only be used in very unusual circumstances.

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END OF PROCEDURE

Next review Jul 2020

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# Data Protection Policy - GDPR

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## Introduction

The Company aims to promote high standards to protect individuals' rights to privacy. This encompasses the handling and processing of personal information, audio or video recordings and still photographs made in the course of workshops and shows. It applies to all forms of data, be they electronic, paper or digital media, and includes students, employees, volunteers, suppliers and members of the public.

Failure to comply with this policy may result in (internal) disciplinary proceedings.

## Responsibilities

It is every staff members' responsibility to ensure that:

All personal data is kept securely in the course of their work to ensure confidentiality is maintained. Personal information must not be disclosed in writing, orally or accidentally to any unauthorised persons.

Information provided to the Company is current and accurate.

The Company is informed of any changes to personal information held in the record(s).

The Company is informed of any errors or changes in staff information.

## Data Access and Usage

Staff should exercise reasonable care to safeguard all documentary or other materials containing confidential information. Intellectual property under copyright law: Access to Films, videos, and activity photographs held by the Company shall only be allowed where prior permission has been granted by the individual concerned.

Access to all other data shall be limited to persons that have been expressly permitted to view/use the data by the Freewheelers Data Controller.

## Subject's Rights to Access Information

Any individual shall have the right to access any personal data kept about them on electronic or paper files. Any person wishing to receive notification of the information being held must do so in writing.

## Designated Data Controller

The Operations Manager shall be the designated data controller on a day-to-day basis for the Company as an organisation.

## Data Collected

The Company will hold personal records that cover:

Employment: Recruitment and selection process. Employment/contract records. Monitoring and evaluation at work. Workers' rights.

Details, including health information and third party contacts for the students, staff and volunteers. This must be relevant to the individual's safety whilst engaged with the Company.

DBS checks and other referrals.

Supplier details: business address and location, contracts...

Funders and donor contacts.

Details of contacts who have expressed an interest in the activities of the Company.

All Company soft and hard copy correspondence.

## **Data Retention**

All data shall be:

Kept within the UK, and be confidential and secure at all times (before, during and after engagement with the Company).

Retained fairly and lawfully, within the guidelines of The Data Protection Act 1998, and, from May 2018, The EU General Data Protection Regulation (GDPR).

Adequate, relevant and not excessive.

Accurate, and updated as necessary.

Processed with regard to the rights of the individual.

All data held in an electronic form (database) shall be stored on UK based, encrypted servers, access to which shall be strictly controlled by user name and password. The logon shall also dictate the level of data accessible to that individual.

All electronic data shall be securely backed up.

Kept as long as necessary, or as specific statutes stipulate.

Any personal information held on the company's mailing database will be removed at the request (in writing) of the individual.

Where transfer outside the UK is deemed necessary this shall only be permitted where the receiving country has sufficient data protection law. It shall be adequately protected in transit.

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END OF POLICY

Next review Jul 2020

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# Data Protection Policy - DBS

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This policy concerns the storage, access, handling, usage, retention and disposal of Disclosure And Barring Service (DBS) Certificates and certificate information (Formerly CRB Checks).

## General Principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, the Company complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

## Storage And Access

Disclosure information is kept in the 'confidential' section of the the Company database, and access is limited to those who are entitled to see it as part of their duties. Only staff and volunteers authorised by the General Manager have access to this section of the database.

## Handling

In accordance with Section 124 of the Police Act 2002, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

## Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

## Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail

## **Disposal**

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately suitably destroyed by secure means, i.e. by being permanently deleted from the database. We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of the certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of the recruitment decision taken.

## **Cases Where The Certificate Prevents The Applicant Having Unsupervised Contact With Children Or Vulnerable Adults**

For the purposes of this policy, the Disclosure Officer is Julie Shettle, and the Lead Officers are Katie Gentry and Viv Colvill.

If a certificate is received back from the DBS which shows a previous conviction or comment the Disclosure Officer shall contact the Lead Officer informing them of the details. The Disclosure Officer shall assist the Lead Officer in making the appropriate decision regarding this applicant.

The Lead Officer may request that the applicant attends a meeting to discuss the items shown on the DBS certificate, in order to assist them in making a fair and reasonable decision.

The Lead Officer shall, if it is decided to exclude the applicant, then inform the applicant of their immediate exclusion and retain the disclosure under conditions as outlined.

The Lead Officer shall not divulge the details of the applicant of the certificate to any other person.

The decision to recommend exclusion will not be taken lightly and any dispute between the Disclosure Officer and the Lead Officer will be referred to the DBS.

The applicant shall be excluded whilst the dispute process is undertaken.

Appeal by the applicant regarding the exclusion must be directed to the DBS or to Surrey Community Action who will refer it to the DBS.

Subject to all appeal processes, the Disclosure held by the Lead Officer of the group or by Surrey CA shall be destroyed as outlined.

The Lead Officer is permitted to inform the applicant that the decision to exclude has been taken after recommendation by the Umbrella Body (Surrey CA) as a result of details provided by the DBS.

## **Current Certificate**

For the purposes of the group a 'Current Certificate' shall be one which is less than three years old.

Certificates obtained previously by volunteers shall be acceptable provided that:

They have been issued within the last three months.

They are 'Enhanced' level checks.

Applicants will be encouraged to sign up for the DBS Online service, which allows an up-to-date certificate to be viewed online at any time.

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END OF POLICY

Next review Jul 2020

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# Equality and Diversity Policy

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## Introduction

The Company is committed to eliminating discrimination and encouraging diversity. The Company will choose members, voluntary helpers, or people who are paid to work with us, without discriminating on the grounds of gender, race, colour, nationality, ethnic origin, religious or philosophical beliefs, health status, HIV status, age, marital status, parental status, sexual orientation, political beliefs or trade union membership, class, responsibility for dependents, physical attributes, ex-offender status as defined by the Rehabilitation of Offenders Act 1974, lack of formal qualifications where such qualifications are not formally required, or any other grounds which cannot be shown to be justifiable within the context of this policy.

The Company will abide by the Equality ACT 2010 to promote fairness and eliminate all forms of unlawful or unfair discrimination throughout our activities. We aim to make each person who works for us, and with us, to feel respected and able to give his or her best.

This Policy has been compiled with advice from Surrey Community Action, and with reference to ACAS guidelines.

## Legal Obligations

Equal Opportunities and Discrimination (Equality Act 2010).

The new Equality Act came into force in October 2010 and replaces all previous equality legislation in England, Scotland and Wales – namely the Race Relations Act 1976, the Disability Discrimination Act 1995, the Sex Discrimination Act, the Equal Pay Act, the Employment Equality (Age) Regulations 2006, The Civil Partnership Act 2004, the Employment Equality Regulations 2003 (religions and belief and sexual orientation).

The protected characteristics are:

Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief sex and sexual orientation.

In valuing diversity the Company is committed to going beyond the legal minimum regarding equality.

The Equality Act 2010 harmonises, strengthens and replaces most previous equality legislation. The following legislation is still relevant:

The Human Rights Act 1998.

The Work and Families Act 2006.

Employment Equal Treatment Framework Directive 2000 (as amended).

Selection for any type of position, and any benefit connected with it, will be on the basis of aptitude and ability. Everyone will also be encouraged to develop his or her full potential.

## **Recruitment and Selection**

The recruitment and selection process is crucially important to any equal opportunities policy. We will endeavour through appropriate training to ensure that individuals making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.

Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.

Job descriptions, where used, will be revised to ensure that they are in line with our equal opportunities policy. Job requirements will be reflected accurately in any personnel specifications.

We will adopt a consistent, non-discriminatory approach to the advertising of vacancies.

All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do their job.

Short-listing and interviewing will be carried out by more than one person where possible.

Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.

Selection decisions will not be influenced by any perceived prejudices of other staff.

## **Monitoring**

The Company will assess the mix of members and staff annually to ensure that there is no bias which suggests unfair discrimination. The discrimination criteria listed above will be used where we know these facts, but we will not ask anyone to divulge personal information.

The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and staff.

## **Our commitment:**

To create an environment in which individual differences, and the contributions of all our members and all our staff, are recognised and valued.

To ensure that everyone who works with us, and for us, enjoys a working environment that promotes dignity and respect for all.

No form of intimidation, bullying or harassment will be tolerated.

We will constantly review all our employment practices and procedures to ensure fairness.

Our policy on Equality is fully supported by senior management and has been agreed with company members.

The Equality policy will be monitored and reviewed every two years, or as soon as necessary.

## **How the policy will be implemented and who is responsible?**

The Operations Manager has specific responsibility for the effective implementation of this policy. Each person involved in recruitment also has responsibilities and we

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expect all our associates and volunteers to abide by the policy and help create the equality environment which is its objective.

In order to implement this policy we shall:

Communicate the policy to associates, job applicants, volunteers and relevant others. Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff.

Ensure that those who are involved in assessing candidates for recruitment or promotion will be aware of non-discriminatory selection techniques.

Incorporate equal opportunity notices into general communications practices.

Ensure that adequate resources are made available to fulfil the objectives of the policy.

## **Conduct and general standards of behaviour**

All staff and volunteers are expected to conduct themselves in a professional and considerate manner at all times, and in accordance with our Code of Conduct which can be found in our Induction Policy.

The Company will not tolerate behaviour such as:

Making threats.

Physical violence.

Shouting.

Swearing at others.

Persistent rudeness.

Isolating, ignoring or refusing to work with certain people.

Telling offensive jokes or name calling.

Displaying offensive material such as pornography or sexist / racist cartoons, or the distribution of such material via email / text message or any other format.

Any other forms of harassment or victimisation.

The items on the above list of unacceptable behaviours are considered to be disciplinary offences within the Company and can lead to disciplinary action being taken. The Company does, however, encourage staff and volunteers to resolve misunderstandings and problems informally wherever possible, depending on the circumstances. However, whether dealt with informally or formally, it is important for staff who may have caused offence to understand that it is no defence to say that they did not intend to do so, or to blame individuals for being over sensitive. It is the impact of the behaviour, rather than the intent, that counts, and that should shape the solution found both to the immediate problem and to preventing further similar problems in the future.

## **Complaints of discrimination**

The Company will treat seriously all complaints of unlawful discrimination on any forbidden grounds made by employees, trustees, clients or other third parties and will take action where appropriate.

All complaints will be investigated in accordance with the Company's complaints procedure as appropriate, and the complainant will be informed of the outcome in line with these procedures.

We will also monitor the number and outcomes of complaints of discrimination made by staff, volunteers, clients and other third parties.

## **Types of Discrimination**

### **Direct discrimination**

The Company will not treat any of its members, staff and helpers less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic (see below).

### **Associative discrimination**

Freewheelers will not condone discrimination against someone because they associate with a person who possesses protected characteristics.

### **Perceptive discrimination**

Freewheelers opposes this form of direct discrimination against individual company members, voluntary helpers, or people who are paid to work with us, because others think they possess a particular protected characteristic.

### **Indirect discrimination**

Freewheelers co-opts all forms of protected characteristics under Equality Act 2010 in its policies and procedures, and proportionately treats individual company members, voluntary helpers, and paid workers with respect, dignity and fairness regardless of their particular disadvantage(s).

### **Harassment**

Freewheelers protects individual company members, voluntary helpers, and paid workers against unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating individuals' dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Employees can complain of direct or indirect offensive behaviour through the Freewheelers Complaints Procedure.

### **Victimisation**

The Company protects individual volunteers, workers and members against any form(s) of discrimination as stipulated in the Equality Act. Any breaches will be treated individually under the internal procedures of the Company.

## **Protected Characteristics: Definitions of key points**

Age:	Reference to a person of a particular age or age group (range of ages).
Any form of Disability:	A person has a disability if: They have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.
Ethnic Origin (Race):	Race includes colour, nationality, ethnic or national origins. Thus a reference to a person who has a particular protected characteristic is a reference to a person of a particular racial group.
Gender:	A reference to (a) a man or woman, (b) persons of the same gender.
Gender Reassignment:	if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's gender by changing physiological or other attributes of gender, or trans-sexuality.
Marriage or Civil Partnership:	A person has the protected characteristic of marriage and civil partnership if the person is married or is a civil partner.
Religion or Belief:	Religion means any religion and reference to religion includes a reference to lack of religion. Belief means any religious or philosophical belief and reference to belief includes lack of belief.
Sexual Orientation:	This means a person's sexual orientation towards; Persons of the same sex Persons of the opposite sex, or Persons of either sex

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END OF POLICY

Next review Jul 2020

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# Financial Management Policy

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This document sets out the procedures for the day-to-day management of the Company's finances. The policy ensures that:

There are consistent and transparent procedures in place to ensure that assets are safeguarded and to prevent misappropriation and misallocation of monies.

The Company's assets are used to the best advantage, e.g. keeping money where it will make the maximum interest.

The controls are appropriate for the level and type of activity, to ensure efficient and professional management.

## **Bank Accounts**

Bank accounts in the name of the Company are opened or closed only with the full approval of the Board of Trustees.

There shall always be appropriate approval for movements between, and payments from, bank accounts.

Two authorised signatories, who shall be unrelated to one another, are required to approve any direct debit or standing order.

All documentation relating to direct debits and standing orders shall be retained and payments shall be monitored to ensure that the arrangement is cancelled when the Company stops using the goods or services being supplied.

## **Cheques**

The authorised cheque signatories are listed at the end of this document. Each signatory has the responsibility to make certain that cheques are made out to the correct payee and for the correct amount.

Two signatures are required on all cheques.

No signatory may sign a cheque payable to themselves or to a spouse/partner or relative.

Where two signatories are authorising a payment, those individuals shall not be related to one another.

No blank cheques may be signed.

All cheques are hand written and as far as practicable, drawn up by a person other than a signatory.

## **Debit Cards**

The Company has three debit cards. These are used by the General Manager, Treasurer and CEO.

The cards may only be used by the individual to whom the card has been issued.

All expenses must be supported by a valid invoice or receipt and with an explanation of purpose. These must be immediately forwarded, together with any relevant authorisation, to the General Manager for account allocation. The General Manager will then forward the details to the Treasurer or Administrator, who will reconcile the debit card purchases with the bank account no less than twice a week.

Any expense over £1,000 must be pre authorised by a Trustee.

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Copies of all statements shall be sent directly to the Treasurer or Administrator and not to the individual card holder. The statements shall be used to analyse transactions, matching these with supporting receipts and invoices.

Card use will be reviewed periodically to ensure consistency of use within set policies.

Payment cards shall be cancelled and destroyed if the individual card holder ceases to be involved in the Company or if the authorisation of the card's use is withdrawn.

### **Electronic (Internet) Banking**

As with all other types of transaction, there should be a clear separation of duties, to prevent any single person being able to control resources.

All electronic payments must be authorised by the General Manager or Treasurer, and processed by the Administrator.

Authorised individuals shall keep all passwords and PINs secret and never share their security details with one another.

After each transaction, a print-out shall be produced & stored by the Administrator as a record.

### **Payment of Expenses**

The Company pay expenses for travel and other out of pocket expenses on production of receipts or other evidence of expenditure.

Any mileage rate paid will not be above HMRC rates (thus not resulting in a tax or National Insurance liability for the organisation or the claimant).

There shall be a clear requirement to complete expenses claims and to provide receipts promptly.

Expense claims shall contain a self-declaration that the claim is accurate and incurred in connection with the business of the organisation.

Expense claims shall be authorised by the General Manager or a Trustee.

Reimbursement should be made by cheque or bank transfer as far as possible, to minimise cash payments.

### **Cash**

Payments in cash should be kept to a minimum due to the greater risk that handling cash presents and difficulties that can arise in establishing accuracy & control over cash transactions.

Where payments are made in cash, the following procedures will be followed:

Cash payments shall be for small amounts only (Max £100).

Cash shall be paid from a petty cash float specifically kept for such payments.

Supporting documentation for the cash payment must be provided and should be authorised by General Manager, Fundraiser, Treasurer or Chair of Trustees, and not the person who maintains the petty cash or the person making the payment.

### **Checks on Expenditure**

All expenditure of the organisation's funds must be properly accounted for and in accordance with the objectives of the organisation.



All payments should be promptly recorded, including details of the nature of the payment, supported by relevant receipts or invoices.

Regular quarterly checks must be made by the Treasurer or a Trustee to ensure records are being accurately maintained and that there are no discrepancies.

### **General Manager's Authority to Approve Payments**

The General Manager is authorised to make or approve payments only when the following conditions are met:

#### **Grant budgets**

Where the spending is for a project paid for by a grant, the grant budget will specify how much can be spent under each category, and the General Manager has automatic approval to spend those amounts plus 20%. Any greater increases in spending should be approved by the Fundraiser or a Trustee. If the project, and therefore the budget, is changed during the period of the grant with the agreement of the funders, the General Manager will have a new budget with new spending approvals.

#### **Termly cash flow**

Where the spending is not paid for by a grant, the General Manager will rely on the termly cash flow forecast which will be updated at least three times per year. The General Manager should not spend more than £1,000 in excess of amounts shown on the cash flow forecast without consulting the Treasurer or a Trustee.

Within these guidelines, the General Manager can make payments on the company debit card (subject to the restrictions laid out previously in this policy), or by instructing the Administrator to make payment of invoices.

### **List of Approved Cheque Signatories**

See introduction

Two signatures are required on cheques, one of which must be the Administrator.

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END OF POLICY

Next review Jul 2020

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# Fire Policy

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The Company aims to protect ALL persons including staff, members, volunteers, visitors, contractors and the public from potential injury and damage to their health that might arise from an outbreak of fire.

The Company will provide and maintain safe and healthy working conditions, equipment and systems of work for all members and volunteers, and to provide such information, training and supervision as they need for this purpose.

The Company maintains a high level of commitment to health and safety and will comply with all statutory requirements thus:

Emphasise the need for preventing fires and reducing risk.

Take responsibility for ensuring the safety of everyone who uses our premises and in the immediate vicinity.

The company will ensure that:

All fire exits and associated paths are kept clear and unobstructed.

Public notices are in place and that suitable fire fighting equipment is available and unobstructed.

A published fire drill is maintained and tested at least once a term for each Monday, Tuesday and Friday group. This must be referred to as an **EMERGENCY EVACUATION DRILL**. Fire alarms must **NOT** be sounded.

Fire wardens and assistant wardens are briefed regularly to ensure they are current on procedures.

## Specific Evacuation Problems

The company has staff and students with varying disabilities that could cause problems during evacuation:

Sudden and/or loud noise can cause unpredictable actions.

Wheelchairs can cause major bottlenecks, especially in a panic situation.

Mobility difficulties may make evacuation difficult.

Assistance dogs and their leads are a trip hazard and the dogs may react in an unexpected manner.

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END OF POLICY

Next review Jul 2020

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# Health and Safety Policy

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This is the statement of general policy and arrangements for:

## **FREEWHEELERS THEATRE AND MEDIA LTD**

The General Manager has overall and final responsibility for Health and Safety.

The Health and Safety Co-ordinator has the day-to-day responsibility of ensuring this policy is put into practice:

Governing regulations: Health and Safety at Work regulations 1999 and updates as they are published.

### **STATEMENT OF GENERAL POLICY**

To prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace.

**Responsibility:** **General Manager**

#### **Action/Arrangements:**

Relevant risk assessments will be carried out and actions arising out of those assessments implemented. (Risk assessments will be reviewed whenever working habits or conditions change.)

Clear instructions and information, and adequate training, to ensure employees are competent to do their work.

**Responsibility:** **Health and Safety Coordinator**

#### **Action/Arrangements:**

Staff, volunteers and subcontractors will be given health and safety induction and provided with appropriate training (including working at height, asbestos awareness and electrical safety) and personal protective equipment.

The Company will ensure that suitable arrangements are in place to cover employees engaged in work remote from the main company site.

The Company will engage and consult with employees and volunteers on day-to-day health and safety conditions.

Health and Safety publicity materials will be prominently displayed.

**Responsibility:** **General Manager**  
**Health and Safety Coordinator**  
**All staff**  
**Bridge Centre Manager**

#### **Action/Arrangements:**

Staff routinely consulted on health and safety matters as they arise but also formally consulted at regular health and safety performance review meetings or sooner if required.

Maintain signage, ensuring that the following are prominently visible:

HSE A3 Health and Safety poster.\*

Action to be taken in case of fire.\*

Details of the Freewheelers first aiders.

Details of the Freewheelers fire wardens.

Freewheelers statement of health and safety.

*\*This may be already in place by the building's management*

Publish emergency procedures – evacuation in case of fire or other significant incident.

**Responsibility**

**General Manager**

**Action/Arrangements:**

Escape routes will be well signed and kept clear at all times.

Evacuation plans will be tested from time to time (at least once a term) and updated as necessary.

The Company will ensure that fire risk assessments are up to date.

The Company will maintain safe and healthy working conditions.

The Company will provide and maintain plant, equipment and machinery, and ensure safe storage/use of hazardous substances.

**Responsibility**

**Health and Safety Coordinator**

**Action/Arrangements:**

Toilets, washing facilities and drinking water will be provided.

A system will be in place for routine inspections and testing of equipment and machinery, and for ensuring that action is promptly taken to address any defects.

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END OF POLICY

Next review Jul 2020

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# Health and Safety Risk Assessment

## Introduction

This Risk Assessment should be used in conjunction with the Company’s Health and Safety Policy.

## Objectives

To ensure that possible health and safety issues are identified and appropriate action is taken to deal with them in a timely manner.

## Risk Review Schedule

This assessment shall be reviewed every six months or sooner if new risks become known.

## Risks Identified and Assessed

### Electrical

Probability	Low
Likely Scenario	Injury or death caused by electric shock.
Mitigation	Regular PAT testing of all high (mains) voltage equipment, repairing if possible. Otherwise destroying failed items. No high voltage equipment to be used without the appropriate, in-date, test label attached. Regular monitoring of all equipment in use, including personal equipment.
Responsibilities	Assistant Health and Safety Co-ordinator.

### Falling objects

Probability	Medium
Likely Scenario	High mounted fixtures become detached. Objects in storage cupboards fall from shelves.
Mitigation	Periodic checks of fixtures. Avoid heavy objects being stored on high shelves.
Responsibilities	Health and Safety Co-ordinator.

### Fire

See separate policy.

## Fittings and Fixtures

Probability	Low
Likely Scenario	Injury caused by collision with fixed objects.
Mitigation	Ensure that potential hazard are clearly marked with safety tape. Remove obstacles if possible.
Responsibilities	Health and Safety Co-ordinator.

## Hazardous substances

Probability	Medium
Likely Scenario	Injury caused by contact with cleaning agents etc.
Mitigation	Cleaning materials to be kept in a secure cupboard. (No member of the Company handles these).
Responsibilities	Health and Safety Co-ordinator

## Manual handling

Probability	Medium
Likely Scenario	Injury or strain to the lower back caused by incorrect handling of heavy objects.
Mitigation	Conduct informal training in manual handling. Display posters on storage cupboard doors.
Responsibilities	Health and Safety Co-ordinator

## Mobility aids

Probability	Low
Likely Scenario	Injury caused by tripping over mobility aids, Assistance dog leads, feet run over by wheelchairs or trapped within the wheel spokes.
Mitigation	Briefing of visitors on interaction with mobility aids. Specific briefing during inductions.
Responsibilities	Health and Safety Co-ordinator.



## Noise

Probability	High
Likely Scenario	Unpredictable reactions to sudden loud noises.
Mitigation	Studio doors to be kept closed to minimise noise in the foyer area. Staff and volunteers to be made aware of the likely impact on various individuals and how to handle the situation.
Responsibilities	Health and Safety Co-ordinator

## Pests

Probability	Low
Likely Scenario	Illness caused by contact with rodents, cockroaches, bugs, etc.
Mitigation	Professional company called to deal with the problem.
Responsibilities	Bridge Centre Manager.

## Scalds and burns

Probability	Medium
Likely Scenario	Injury from hot surfaces (i.e. Cooker) or hot water (kettle, water boiler, etc.)
Mitigation	Staff to monitor kitchen at busy times and ask people to leave if it is over crowded. Switch cooker, hob and any water boiling equipment off at the wall isolator when not in use.
Responsibilities	Health and Safety Co-ordinator.

## Snow and Icing Conditions

See separate policy.

## Spillages or Water Leaks

Probability	Medium
Likely Scenario	Injury caused by slipping on spilt liquids or leaks.
Mitigation	Ensure that spillages are cleaned up immediately. Leaks are identified and action taken to have the cause repaired as soon as is practical. Place 'Wet Floor' signs as appropriate.

Responsibilities                      All Staff

**Trips and Entanglement**

Probability                              Low

Likely Scenario                      Injury caused by tripping over temporary equipment, flooring, cables etc.

Mitigation                              Wherever possible, equipment such as tripods, speakers, etc should be placed outside the main movement areas. Floor mats should be held in place with tape. Cables to be routed around the outside of the room or taped to the floor where this is not possible. No cables are to be laid across entrance doors.

Responsibilities                      Health and Safety Co-ordinator.

**Vulnerable participants**

Probability                              Low

Likely Scenario                      Vulnerable persons may be at greater risk from a range of hazard issues.

Mitigation                              All staff & volunteers must be DBS checked. Vulnerable people should work in groups under supervision. Staff should be trained on management of Epilepsy episodes and mental health issues. See specialist policies on Vulnerable Adults and Child Protection.

Responsibilities                      All staff

**Vulnerable participants leaving the building**

Probability                              High

Likely Scenario                      Vulnerable persons leaving the building unsupervised may injure themselves or become disoriented.

Mitigation                              'STOP!' signs placed on entrances and exits at head height. At least one staff member, volunteer or parent present in each room a member is in at all times. Regular reminders to staff, volunteers and members.

Responsibilities                      All staff

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## Working alone

Probability	Medium
Likely Scenario	An accident occurs where the individual may not be able to summon assistance.
Mitigation	At least two people to be on site at all times.
Responsibilities	Health and Safety Co-ordinator.

## Working at height

Probability	Medium
Likely Scenario	Injury caused by falling from ladders etc.
Mitigation	Use of ladders discouraged in favour of step ladders. Use of chairs, tables etc to gain height discouraged. Where a ladder is essential, it must be manned at the foot. Professionals hired to work at height in theatres.
Responsibilities	Health and Safety Co-ordinator.

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END OF ASSESSMENT

Next review Jul 2020

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# Induction Policy

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This Policy is designed to ensure the effective integration of all Associates, Volunteers and Carers/PAs into the Company for the benefit of both parties.

The General Manager is responsible for the communication of this policy to relevant individuals who carry out the inductions. Specific elements of this process may be delegated to other people with appropriate knowledge / resources.

Full induction procedures are described in the Freewheelers Induction Handbook. A copy of the handbook will be given to all individuals who will be expected to sign and date that they have understood and agreed to the requirements.

The requirement for Carers/PAs is a basic introduction to the venue(s) that they will be attending and will focus on general orientation, fire drills, code of practice, limits of their involvement. This may also be used for persons seeking to join the Freewheelers as an associate or volunteer prior to their formal acceptance. It is the responsibility of each member/associate to inform our Workshop Coordinator that a new carer will be attending Freewheelers ahead of the first attendance. Communication should include the proposed first date of attendance, carer/PA's name and contact number if possible.

For staff/volunteers, once accepted, they will undergo a more in-depth introduction including checks on registration details, DBS checks, health and safety procedures and company overview including our mission statement and company values.

The induction will take place at the earliest opportunity, and before the individual is allowed to become fully involved with workshops/performances.

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END OF POLICY

Next review Jul 2020

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# Leave Policy

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## Staff and Associates

### Ordinary Leave

May be taken at any time giving as much notice as possible to both the General Manager and the Workshop Co-ordinator.

### Compassionate / Sick Leave

Regretfully compassionate pay cannot be given for absences for personal reasons as this directly counters self-employed status.

### Maternity Leave

Maternity leave is under review and should be completed by July 2019.

## Members

The members absence policy is described on the registration form.

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Next review Jul 2020

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# Merchandise and Ticket Policy

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## **Guidelines for discounted and/or complimentary merchandise**

If an associate or volunteer is required by the Company to wear Freewheelers branded clothing as 'Uniform' for an event, he or she will be able to borrow one from the company for this purpose. The company will keep a stock of clothing specifically for this purpose, which will be washed after the associate or volunteer has returned it, and kept for future use.

If an associate or volunteer wishes to purchase his/her own Freewheelers branded clothing, he or she will be entitled to purchase these items at cost price. This is the price paid by the Company to the supplier for the items.

## **Guidelines for discounted or complimentary tickets to Associates and Volunteers.**

Associates or volunteers who are working in artistic roles that require them to watch the performance (e.g. director) will be given reserved seats in the auditorium free of charge.

Associates or Volunteers who are working in front of house roles, or who are Trustees of the Company, shall be entitled to watch the performance free of charge provided that there are still tickets remaining after all paying members of the public have purchased their tickets and entered the auditorium.

Associates, volunteers and trustees should purchase tickets in advance in order to guarantee a ticket. They shall be entitled to concessionary ticket prices if requested. These should be arranged at least 48 hours in advance via the performance co-ordinator.

The Company works with over 50 volunteers and at some events such as the annual Showcase, a large chunk of our audience is made up of people who have helped us in some way throughout the year. We would struggle to cover costs if we gave everyone free tickets, so if you are happy to pay for a ticket as well as helping out, please do – and know that by doing so you are making your contribution stretch even further.

This is intended as a guideline only and exceptions may be made at the discretion of senior management.

## **Guidelines for discounted or complimentary tickets to others.**

This is wholly at the discretion of the General Manager, designated staff member or Trustee.

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END OF POLICY

Next review Jul 2020

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# Vulnerable Adults Safeguarding Policy

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The Company subscribes to the Surrey Safeguarding Adults Board e-newsletter and receives notification of any changes to the law or best practice which inform updates to this Policy.

## Statement of Policy

We wish to protect our vulnerable adult members both from any kind of abuse and from accidents wherever possible.

The Company recognises that 'abuse' – the violation of an individual's human and civil rights by another person or persons – can take many forms. It may be physical, verbal or psychological, it may be an act of neglect or a failure to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. It may consist of a single act or repeated acts. (See attached notes for further information on types of abuse, who may be the abusers, where it may take place, and recognising the signs and indicators of abuse).

The Company is committed to a code of practice that not only protects vulnerable adults from harm but also enables them to take as full a part as possible in the Company's decision-making processes. All members of the company, whether or not they are vulnerable adults themselves, accept and recognise their responsibilities to develop awareness of these issues.

The Company believes that:

The welfare of vulnerable adults is paramount.

Some risks must be taken if people are to live a full life.

All vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and sexual identity have the right to protection from abuse.

All suspicions and allegations of abuse should be taken seriously and responded to swiftly and appropriately.

### **Involvement of External Agencies:**

The Single Point of Access (SPA).0300 470 9100 (9-5 Monday to Friday) or 01483 517898 (out of hours).

The Police on 999.

The Company will ensure that:

All Company members will be treated equally and with respect and dignity.

A balanced relationship based on mutual trust will be built which empowers everyone to play a full part in the life of the Company.

Action will be taken to stop any inappropriate verbal or physical behaviour.

All members and employees of the Company are fully informed on how to respond appropriately in situations of alleged abuse or accident.

The Company keeps informed of changes in legislation and policy for the protection of vulnerable adults.

The Company will undertake relevant training.

The Company will maintain a register of all people working with the company and will retain a contact name and number close at hand in case of emergencies.

This Policy will be monitored and will be subject to regular review by the Trustees of the company.

The Board of Trustees will appoint a Safeguarding lead and sub-Committee of at least two members.

## **Procedures for the Protection of Vulnerable Adults**

This document defines the procedures to be followed both to mitigate risks and in case of abusive or accidental harm.

## **Disclosure and Barring Service checks**

Enhanced DBS (Disclosure and Barring Service) checks are required for all adults carrying out regulated activities during the course of their work for the Company.

## **Responsibilities of the Company**

Risk assessments will be made of any new venue used by the company.

Risk assessments will be made of each production as it evolves to ensure the safety of all concerned.

Unsupervised contact between visitors and our vulnerable adults will not be permitted unless they have DBS disclosure.

Every potential worker and volunteer must provide references, attend an interview and undergo a DBS check if their work brings them into contact with vulnerable members. All references must be taken up.

Ongoing training will be provided to all Company Members so that issues of harm and abuse are clearly understood and everyone is confident that concerns will be addressed.

The whereabouts of all Company Associates and Volunteers must be known while they are at work.

Two Company Associates or Volunteers shall be present at all times.

Up to date contact details for all Company Members will be kept to hand in case of emergency.

Up to date medical information for all Company Members will be kept to hand and communicated to the relevant Associates and Volunteers to enable them to act in a way that protects individuals from harm. Information will be shared only as necessary, and with reference to our Data Protection Policies.

Relevant staff will know how to get in touch with the Multi Agency Safeguarding Hub in case it needs to report a concern about abuse.

The Company will seek permission from individuals and/or their carers to use photographic material for promotional or other purposes.

The Company's web-based materials and activities will be carefully monitored for inappropriate use.

The Company will ensure confidentiality in order to protect the rights of its members, including the safe handling, storage and disposal of any sensitive information such as DBS disclosures.

Respect for others will be encouraged by the staff at all times, in accordance with the Code of Conduct

## **Individual responsibilities -**

### **Accidents**

If anyone is injured while in the care of the Company.

First aid will be administered.

If necessary the emergency services will be called.

Telephone contact will then be made with the contact nominated by the injured person.

The workshop tutor should be informed if not present at the time of the accident; the Safeguarding Lead or deputy. If a workshop tutor receives a verbal report they will make a note of the details and pass this to the safeguarding lead or deputy as soon as possible.

Details of the injury will then be recorded in full, along with date, time and place of accident. This record should be signed by the person attending.

### **Abuse**

#### **Suspicion of Abuse**

If you see or suspect abuse of any kind:

If there is an immediate danger, phone 999.

Make your suspicions known to a member of staff or the Safeguarding Lead immediately. If a member of staff receives a verbal report they will make a note of the details and pass this to the Safeguarding Lead as soon as possible. In the case of an allegation being made against the Safeguarding lead or anyone else named above, this should be reported directly to a member of the Safeguarding sub-Committee.

Please make a note for your own records of what you witnessed and your response, in case there is follow-up in which you are involved.

#### **Disclosure of Abuse**

If someone confides in you that abuse has taken place:

Listen carefully to what has been said. Allow them to tell you at their own pace and ask questions only for clarification. Don't ask questions that suggest a particular answer. Don't pass judgement.

Tell them that you must pass the information on, to whom and why.

#### **Safeguard the person**

Speak immediately to a member of staff or the Safeguarding Lead

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Record the words of the person in writing as soon as is practical (see 'Recording' below).

**Do Not:**

- Confront the alleged abuser.
- Begin an investigation on your own.
- Damage or destroy possible evidence.

***In cases of suspected or reported abuse you must speak to a member of staff or the Safeguarding Lead who will ensure that the Multi Agency Safeguarding Hub is contacted if necessary. In an emergency, phone 999.***

**Responsibilities of the Safeguarding Lead when suspected abuse is reported:**

Listen carefully to what has been said. Allow them to tell you at their own pace and ask questions only for clarification. Don't ask questions that suggest a particular answer. Don't pass judgement.

Make a detailed note of what has been reported.

If there is an immediate concern for a person's safety, dial 999 and ask for the Police. Whether or not the concern is judged to be serious, inform the Safeguarding sub-Committee what you are doing about it.

If the suspected victim and/or abuser has a primary carer or social worker who is known to Freewheelers, contact them to discuss your concerns.

If the primary carer / social worker is not known to Freewheelers, the Safeguarding Lead will contact MASH within 24 hours of the concern being raised.

**Additional responsibilities of the Safeguarding Lead in the case of allegations against Company Members:**

If a serious allegation is made against any member of the Company, assisting volunteer, etc., that individual will be suspended immediately until the investigation is concluded. This decision should be made in conjunction with a Trustee.

In all cases, listen carefully to what has been said, and make a detailed note of any conversation.

Whether or not the concern is judged to be serious, inform a Trustee or another member of Senior Management what you are doing about it.

If necessary, put temporary measures in place, with reference to the Company Violence at Work Policy, to prevent any further instances occurring.

Follow the Company Complaints Procedure and resolve disputes internally where possible.

If you suspect that a crime has taken place, dial 999 and ask for the Police.

If you have concerns for the ongoing welfare of a Vulnerable Adult, follow the steps listed above (Responsibilities of the Safeguarding Lead when suspected abuse is reported)

The above actions will be carried out by the Safeguarding sub-Committee in the case of an allegation being made against the Safeguarding Lead.

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## **Recording**

In all situations, including those in which the cause of concern arises from a disclosure made in confidence, the details of an allegation or reported incident must be recorded, regardless of whether or not the concerns have been shared with a statutory protection agency.

An accurate note shall be made of the date and time of the incident or disclosure; the parties involved; what was said or done and by whom; any action taken to investigate the matter; any further action taken, e.g. suspension of an individual; where relevant the reasons why the matter was not referred to a statutory agency; and the name of the persons reporting and to whom it was reported.

The record will be stored securely and shared only with those who need to know about the incident or allegation.

## **Rights and Confidentiality**

If a complaint is made against a member of the Company he or she will be made aware of their rights under the Company's disciplinary procedures.

Both the alleged abuser and the person who may have been abused have the right to confidentiality under the Data Protection Act 2018. Remember also that any possible criminal investigation could be compromised through inappropriate information being released.

In criminal law the Crown or other prosecuting authority has to prove guilt and the defendant is presumed innocent until proven guilty.

## **Additional Guidance Notes for the Vulnerable Adult Protection Policy**

(From the Surrey Multi-Agency Procedures for Protecting Vulnerable Adults)

### **What is abuse?**

Abuse is defined as: a violation of an individual's human and civil rights by any other person or persons.

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent.

Abuse can be broadly defined under the following categories:

### **Physical abuse**

Physical abuse is the non-accidental infliction of physical force that results (or could result) in bodily injury, pain or impairment. Signs might include burns, bruising, scratches or accidents that cannot be explained, misuses of medication or forcing someone, for example, to stay in a care home.

## **Neglect**

Neglect is when a vulnerable adult does not have their basic needs met, such as adequate food or warmth or help with personal hygiene. Signs might include deteriorating health, appearance or mood.

## **Financial abuse**

Financial abuse is when a vulnerable adult is exploited for financial gain, e.g. by a relative or door-to-door salesman. Often valuables will go missing in the home or there may be a change in financial circumstances that cannot be explained.

## **Sexual abuse**

Sexual abuse is direct or indirect involvement in sexual activity that the vulnerable adult has not or could not consent to or was pressurised or manipulated into. Signs can include changes in physical behaviour or physical discomfort.

## **Psychological abuse**

Psychological abuse is that which impinges on the emotional health and development of individuals. It might be emotional abuse such as threats of harm or abandonment, enforced isolation blaming or controlling behaviour, or verbal and racial insults. Signs may be fear, confusion or disturbed sleep.

## **Discriminatory abuse**

Discriminatory abuse consists of abusive or derisive attitudes or behaviour based on a person's sex, sexuality, ethnic origin, race, age or disability.

## **Professional abuse**

This is the misuse of a therapeutic power and abuse of trust by professionals and the failure to act on suspected abuse/crimes.

Abuse may consist of a single act or repeated acts.

## **Who may be abusers?**

People who abuse:

Are often well known to their victims but can be strangers.

Might be a relative, partner, son or daughter, friend or neighbour, a paid or voluntary worker, or a health or social care worker.

Could be another vulnerable adult, service user or group member.

May not realise they are abusing and can sometimes act out of character and abuse because of the stress of caring.

## **Where does abuse take place?**

Abuse can take place in a wide range of settings such as:

The vulnerable adult's home

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Transportation including a carer's vehicle  
A carer's home  
A day centre  
A community centre  
A care home  
A hospital  
The workplace  
Educational institutions  
Company venues  
Theatres and other places visited by the Company

### **Recognising the signs and indicators of abuse**

Where abuse has occurred one or more of the following signs or indicators may have been present. None of these definitively suggest abuse, however, suspicions should be heightened if one or a combination of these indicators exists.

Changes in a person's behaviour  
Unexplained changes in a person's circumstances  
Physical signs of abuse  
Withdrawal of verbal communication  
A person appearing withdrawn  
Unexplained reactions towards particular individuals or settings  
Dislike of being touched and flinching on being touched  
Disturbed sleep patterns  
Frequent or regular visits to the General Practitioner or the accident and emergency department or hospital admissions  
Panic attacks  
Absconding/wandering  
Obsessive or challenging behaviour  
Self harm  
History of domestic violence.

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END OF POLICY

Next review Feb 2020

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# Snow Closure Policy

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If sessions are cancelled due to snow, Associates who would normally be running workshops will be entitled to 30 per cent of their normal fees for that day, but no travel costs. These Associates may be asked to spend some time helping with the task of informing students and volunteers about the cancellation.

Tutors will be entitled to these payments as a matter of Company policy. It will not matter if individual members of staff phone in to say that they couldn't come anyway. They may still claim the same percentage as everyone else.

If alternative teaching work for any teaching member of staff is available on a different day, and provided this is agreed by the General Manager, they can be given this work at full pay, instead of, but not in addition to the 'closed day pay' of 30%.

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END OF POLICY

Next review Jul 2020

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# Social Media Policy

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## Introduction

This policy outlines the behaviour that is expected of all Company Associates, Members, Volunteers and individuals from other organisations who engage with our members through any online activities during the course of their Freewheelers work.

The Company uses the following forms of social networking media to engage with members, professional arts organisations and the general public: Facebook, Twitter, Vimeo, YouTube, Blogs.

## Purpose

This policy has been developed to provide advice and guidelines to help protect vulnerable adults and children, and to help identify practices which could be mistakenly interpreted and perhaps lead to allegations made against individuals appointed by the Company. The policy will also help to safeguard vulnerable people by reducing the possibility of anyone using their role within the organisation to gain access to vulnerable people in order to abuse them.

The policy is also designed to advise staff on what is, and what is not, acceptable when posting comments relating to professional matters and so will also protect the online reputation of the Company and its associates.

This policy is a guide to the acceptable use of social networking by Company associates. There will always be a risk when using social networking: however, this risk can be limited by abiding by the following 'Do & Don't' guidelines.

## DO:

DO post regularly on social media networks

DO re-tweet relevant Tweets by other organisations

DO thank people for positive comments and encourage people to attend Company activities and events

DO think about how your personal social media networking affects the reputation of the Company. Bringing the organisation into disrepute through the use of social media will result in disciplinary procedures being commenced.

DO be cautious about accepting requests to connect with adult colleagues and members on social media. Consider whether you know them well enough to invite them into your personal network and are willing to conduct yourself on social media with the same professionalism you would at a Company workshop.

DO review your privacy and security settings regularly to ensure that any posts relating to the Company or seen by Company contacts are appropriate.

DO seek advice from a member of staff if you receive or notice postings of a sensitive nature.

DO ensure that the Company have permission from people included in any photo or video before making this public. Permission should be sought before shooting, not retrospectively. The Company database holds records of photo and video consent and can currently be accessed by the Programme Co-ordinator, Founder/Fundraiser, Workshop Co-ordinator, Data Manager. Please ask one of them if you are unsure.

If authorised to post from the Freewheeler's account, DO engage with relevant topics around disability politics, in a way which opens discussion as opposed to subscribing to a single closed viewpoint. (e.g. sharing a comment article from a newspaper website, and asking our followers to share their thoughts about it).

## **DO NOT:**

DO NOT accept requests to connect from any students under 18 years of age.

DO NOT 'Tag' children and young people in photos on any website. All Facebook security settings should be set so that 'Tagging' is disabled. 'Tagging' of people under 18 can breach Safeguarding guidelines.

DO NOT 'Tag' people over 18 unless you have their permission to do so.

DO NOT encourage members to publish personal information on any online network.

DO NOT interact with members of the press on Twitter. If approached by members of the press please forward queries to the General Manager or appointed deputy.

DO NOT hold personal conversations on the Company's social networking forums.

DO NOT post negative comments about any artists, projects or performances.

DO NOT comment on legal cases at any time.

DO NOT post, or respond to, negative comments about the Company online. Forward these to the General Manager or appointed deputy who will advise on a course of action (with reference to Safeguarding policies where necessary).

DO NOT make negative comments about workshops or performances on either the Company's, or personal social network forums.

DO NOT use your own Social Media accounts to write derogatory or negative things about the Company.

DO NOT make posts which claim to give the Company's viewpoint on a political topic unless you are authorised to post from the Company's social media account.

DO NOT attack individual politicians, councillors or activists in the name of the Company.

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END OF POLICY

Next review Jul 2020

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# Violence at Work Policy

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This Policy sets out our procedures for preventing, managing and responding to work-related violence. Work-related violence, including verbal abuse of staff, should not be ignored or taken lightly. No member of staff should be blamed for an instance of work-related violence carried out towards them. All staff have the right to be treated with consideration, dignity and respect.

## Definition of work-related violence

Any incident in which a staff member, volunteer or student is abused, threatened or assaulted in circumstances arising out of the course of his/her time with the Company.

## Responsibilities of staff and managers

### Managers

All managers have a responsibility to implement this policy and to make sure their staff are aware of it and understand it. Managers should also:

Treat any reports of work-related violence, threats or abuse seriously and respond to them promptly.

Record details of the incident where appropriate, and give victims of violence full support during the whole process. They should also respond to, and consider seriously any suggestions made by staff about how to improve violence prevention and management, and give feedback to staff about their suggestions, including whether it will be taken forward, and if not, why not.

Set a positive example by reporting all incidents of violence and not tolerating abusive behaviour.

Respond to and where possible resolve incidents, ideally before they escalate.

Monitor incidents of violence and abuse and initiate appropriate action if more measures are needed. Review and amend this policy and the risk assessment as necessary.

Where possible, direct staff to appropriate support and advice after an incident has occurred. Encourage other staff members to support their colleagues, including those that might have witnessed the incident. If victims are particularly traumatised by the event, provide support where possible, such as time off work or changes to their tasks.

If an investigation is needed, work with the police and offer any assistance needed to help in their enquiries.

Any manager found to be encouraging or inciting violence or not resolving potentially violent or abusive situations may be subject to disciplinary action.

### Staff

All staff have personal responsibility for their own behaviour and for ensuring that they comply with this policy. There are a number of things that staff can do to help prevent work-related violence:

Be aware of the needs of the Company's students, especially those with learning disabilities who may need to be treated with patience or removed from a potentially dangerous situation.

Recognise the potential for work-related violence and take action to resolve it early on. For example, contacting a manager if they think a student or member of the public might cause problems.

Don't accept instances of work-related violence directed towards you or others. Staff should report any instances of violence, threats or abuse, including minor incidents. Be supportive of colleagues who are victims of, or have witnessed work-related violence.

Suggest additional measures to managers which might help to prevent and manage work-related violence.

Any staff member found to be encouraging or inciting violence may be subject to disciplinary action.

## **Risk assessments**

The Company assesses the risk of work-related violence by:

Ensuring all staff and volunteers are DBS checked, alerting us to any history of violence.

Asking all new students and/or their carers what they need in order to feel happy and safe at Freewheelers, thus helping us to reduce the risk of students becoming violent, and alerting us to any student who may pose a particular threat.

Risk-assessing all public events and being alert to anything which may increase the likelihood of violence occurring,

If staff believe a risk factor has not been covered by the assessment or have ideas on further prevention measures, they should discuss these with their manager. The contents of the above risk assessments will be communicated to all staff and appropriate training will be given.

## **Prevention and management measures**

There are a number of measures in place following the risk assessments that staff should be aware of.

**Work environment:** Our workshop spaces all have separate 'quiet' areas where staff can take a student who needs to be separated from the group in order to prevent violence from occurring.

**Working practices:** All workshops are attended by at least two members of staff, in line with The Working Alone section of the Health and Safety Risk Assessment. This allows for one staff member to supervise the group while another deals with any incident of violence or direct prevention of this.

Cash is kept in a locked cash box and removed from view whenever possible. It must be kept in the safe when not in use.

New students (or their carers), staff and volunteers are asked during their registration to tell us about any condition which may make it difficult for them to work in a busy, noisy or stressful environment.



Associates are informed of any information divulged during an individual's registration which may help them to treat the individual in a way that prevents them from becoming violent.

If a disciplinary situation arises, this will always be dealt with by TWO staff members, and never be carried out by a lone staff member, no matter how trivial it may appear to be.

Any argument or confrontation between members, associates and volunteers will be addressed face-to-face on the same day and not left to 'fester' overnight. Staff will facilitate this where possible, ensuring that sufficient supervision is available.

Any complaint against an individual that cannot be kept anonymous will be followed up with the complainant to ensure s/he knows what is being done about it, and a meeting will be set up with all parties present to acknowledge this, clear the air and prevent a build-up of tension between individuals which may lead to confrontation.

## **Training**

All staff and volunteers will be made aware of the Violence at Work Policy as part of their induction.

## **Actions following an incident**

If somebody is being abused, threatened or attacked, they should approach a manager or a member of staff for help. Managers should respond to the situation by talking to the perpetrator, explaining that their behaviour is not acceptable. They should try to resolve the problem and, if that is not possible, call the individual's parent/carer (if applicable), or, in extreme circumstances, the police (see below).

Medical assistance should be provided immediately when required.

The police should be informed (999) of a serious incident involving physical attack or serious cases of threatening or verbal abuse. Police should also be informed of persistent cases of violence, threats and abuse.

Records of incidents should be kept for future reference, and in case the police need them. The following details will be recorded for all violent incidents:

Who was involved,

Descriptions of the perpetrator and any relevant circumstances that may have contributed to the incident.

Any incidents resulting in serious injury to staff or that cause staff to be off work for three days or more must be reported under the RIDDOR Regulations 2013. Any incident which results in a member of the public being taken directly to hospital from the premises must also be reported. Managers should contact the HSE Incident Contact Centre on 0345 300 9923 to report the incident.

Less serious incidents should still be reported to managers whenever they occur and managers should make a note of these. If managers notice an increase in reports, several reports within a short period or reports about the same perpetrator, managers should record the details, ask staff for more information and take action. The action may include excluding individual(s) from workshops, contacting the police about a persistent offender, reviewing risk assessments and considering further prevention measures, or increased vigilance by managers or staff to prevent a more serious incident occurring.

## **Review dates**

This policy should be reviewed every three years, or if regular or serious incidents arise that suggest it needs to be revisited.

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END OF POLICY

Next review Jul 2020

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