



**Life to the Full**  
Handbook 2018



## CONTENTS

1. Code of conduct for volunteers	pg. 2
2. Policy statement for safeguarding	pg. 3
3. Guidelines and procedures for safeguarding	pg. 4
4. Flowchart for procedure when concerns are raised about a child/person's safety or welfare or they disclose abuse	pg. 9
5. Policy, guidelines and procedures for anti-bullying and harassment strategy	pg. 10
6. Policy, guidelines and procedures for appointments	pg. 12
7. Policy and guidelines for safe practice in GBM activities	pg. 14
8. Policy, guidelines and procedures for safe practice	pg. 19
9. Policy and guidelines for equal opportunities	pg. 21
10. Guidelines and procedures for dealing with complaints	pg. 23
11. Flowchart for responding to complaints	pg. 24
12. Policy and guidelines for use of information technology and social media	pg. 26
13. Data protection policy	pg. 29

### Appendix

14. Forms and procedures to support safe practice	pg. 36
---	--------

## CODE OF CONDUCT FOR VOLUNTEERS

**'I have come that they may have life, and have it to the full!'**

*(John Ch.10:10. NIV)*

### Context

GB Ministries (GBM) has a duty of care to its members. It gives particular attention to their social, emotional, physical and spiritual development. The purpose of this code is to set out a list of statements, which describe the standards of conduct expected of all volunteers within the mission movement, and to build on already established good practice.

GBM volunteers should:

- Always seek to demonstrate and promote the Christian faith through their roles
- Aim to emulate Jesus' example by being relational, relevant and responsive to needs through their words and actions
- Pray for, and also with, the children, young people and adults – as appropriate
- Treat all members as individuals
- Treat all members with dignity and respect by engaging with one another in ways that welcome and accept, without judgment
- Respect diversity and promote equal opportunities
- Encourage and equip each person to explore, identify and utilise their God-given gifts regardless of human condition, age, gender or circumstance
- Be aware that bullying in any form is not acceptable
- Deal with conflict in a calm and understanding manner and never act in anger
- Adhere to the relevant church and/or GBM safeguarding procedures and guidelines
- Be aware of health and safety issues and record risk assessments for all GBM activities
- Work openly and co-operatively with other church and GBM volunteers
- Be honest, trustworthy, reliable and dependable
- Be accountable for their own behaviour, so that nothing should call into question their suitability to provide leadership within GBM
- Present a positive role model and set a good example both inside and outside GBM
- Regularly undertake relevant equipping to maintain and develop knowledge, skills and understanding.

It's the responsibility of all GB volunteers to ensure that their conduct does not fall below the standards set out in this code.



## POLICY STATEMENT FOR SAFEGUARDING

### Aim

GBM is committed to the Christian nurture of children, young people and adults within a safe, secure, caring and empowering environment.

### Objectives

In order to achieve this aim, GBM will undertake to:

- Work in partnership with local churches in the appointment of appropriate people to roles
- Adhere to recruitment policies for paid staff appointments
- Provide relevant information and equipping for all registered volunteers and paid staff
- Maintain administrative processes and safe recruitment process for the registration of volunteers and a database of volunteer leadership profiles – see the data protection policy section on Page 29
- Handle all personal information in a caring and sensitive manner and with appropriate confidentiality
- Operate within clearly defined safeguarding procedures for volunteers and paid staff
- Ensure all paid staff and volunteers receive relevant support and supervision
- Designate specified personnel from the GB England & Wales' Network Executive and the GBM Trustee Board to advise on safeguarding issues
- Provide clearly defined procedures with regard to health and safety and risk assessment
- Provide up-to-date information on relevant legislation affecting GBM activities.

### Methods

In order to assist volunteers as they seek to nurture the children, young people and adults in their care, GBM is committed to:

- Providing guidelines on specific areas of concern
- Providing initial and ongoing equipping in all areas but especially in issues relating to the volunteers' 'duty of care'
- Updating volunteers on related issues through, for example, its websites and social media.

### Review

The Trustee Board of GBM will, through its inclusion on their risk register, ensure that this policy is reviewed and updated regularly.



## **GUIDELINES AND PROCEDURES FOR SAFEGUARDING**

### **Contextual statement**

The following child protection procedures are underpinned by numerous pieces of legislation including Working Together to Safeguard Children 2015.

The UN Convention on the Rights of the Child states that every child has the right to protection from neglect and from physical, emotional and sexual abuse.

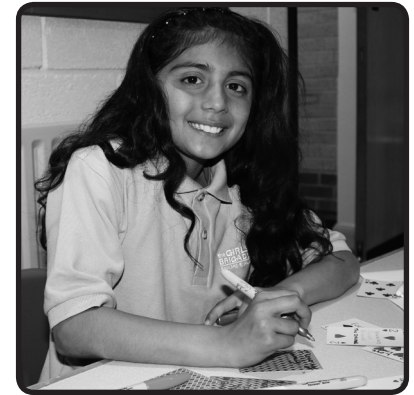
GBM acknowledges the duty of care to its members and is supportive of its volunteers in safeguarding the welfare of the children, young people and adults with whom they work. These guidelines and issues refer not just to children, but to young people and vulnerable adults too. If you have an event where vulnerable adults are present then ensure due care is taken in line with statutory regulations.

These procedures provide a framework to help enable GBM volunteers to respond appropriately to safeguarding issues and give information and guidance with regard to:

- Safeguarding processes
- Understanding what constitutes abuse
- Awareness of signs which could be indicative of abuse
- Dealing with disclosure
- Reporting concerns and/or allegations
- Good practice guidelines.

### **Safeguarding processes**

- All GBM volunteers, including emerging leaders aged 16 plus, who are working with children, young people or vulnerable adults must have a current enhanced DBS check renewed in line with GBM's appointment policy for volunteers.
- All contact with children and young people should be supervised until the required DBS clearance has been obtained.
- GBM teams and the church should ensure that all GBM volunteers have access to a designated independent person with whom they can discuss concerns and from whom they can seek advice.
- Regular GBM team meetings should be held, which will provide opportunities, not only for planning, but also for discussing any areas of concern.
- Remember GBM groups legally belong to the church to whom they are attached and so should follow their church's safeguarding procedures accordingly.



- GBM volunteers will undertake safeguarding training as part of their appointment process and should refresh this training at least every five years with safeguarding refresher training provided by the church, GBM or a relevant professional body. This will be monitored by the GBM Support Team.
- All sleepovers should adhere to GBM's sleepover guidelines, as detailed on the *Sleepover Registration Form*.
- All residential events must meet the requirements listed in the publication *Residential Events Toolkit*, regarding qualification, registration, supervision and risk assessment.

### Understanding what constitutes abuse

A person may abuse or neglect someone by inflicting harm or by failing to act to prevent harm. Children, young people and adults may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger.

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to someone, including fabricating the symptoms of, or deliberately causing, ill health to someone.
- **Emotional abuse** is the persistent emotional ill treatment of someone such as to cause adverse effects on their emotional development. It may involve conveying to them that they're worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children or causing children frequently to feel frightened are also included in this concept.
- **Sexual abuse** involves forcing or enticing someone to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact or they may include being looked at or being involved in the production of pornographic material.
- **Neglect** is the persistent failure to meet someone's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development, such as failing to provide adequate food, shelter and clothing or neglect of, or unresponsiveness to, their basic emotional needs.
- **Spiritual abuse** is the term used when harm is caused by the inappropriate use of religious belief or practice. This can include the misuse of the authority of leadership or penitential discipline, oppressive teaching, or intrusive healing and deliverance ministries. Any of these could result in people experiencing physical, emotional or sexual harm. Other forms of spiritual harm include the denial to people of the right to faith or the opportunity to grow in the knowledge and love of God. Other forms of spiritual abuse are detailed in the government's *Prevent Strategy*.
- **Other areas of abuse** include domestic abuse, female genital mutilation, online abuse, child trafficking, deliberate self-harming, sexual exploitation, financial abuse and forced marriage.



## Awareness of signs which could be indicative of abuse

The sustained abuse or neglect of children, young people and adults, physically, emotionally or sexually can have long-term effects on all aspects of their health, development and wellbeing. The abuse is also likely to have a significant impact on their self-image and self-esteem.

Signs of abuse could include:

- Changes in behaviour
- Displaying many behavioural difficulties
- Unexplained mood swings
- Withdrawn, aggressive, bizarre or strange/harmfully addictive behaviours
- Attention-seeking behaviour
- Guarded and secretive behaviour
- Difficulty in forming relationships
- Repetitive injuries of a minor nature
- Injuries which are not able to be explained
- Inappropriate seeking of affection
- Sexualised behaviour
- Listless and unresponsive behaviour
- Seriously or frequently dirty, unkempt appearance.

On their own, these signs may not constitute safeguarding issues however they could be indicative of abuse and **should not be ignored.**

## Dealing with disclosures or allegations

Responding to the person...

### Do:

- Listen carefully: a person who alleges that abuse has taken place must be listened to
- Respect their point of view
- Reassure them that they've done the right thing in telling you/someone
- Allow them to tell the story without prompting
- Be honest about your responsibility and explain what actions you must take
- Use language appropriate to the age and understanding of the person
- Be aware of the effect of your own attitudes and values
- Make a written record of events, conversations and observations
- Write what they have shared using their own words





- Make a written record of all action taken
- Follow your church and/or GBM procedure for reporting abuse
- Seek advice from designated/appropriate people.

**Don't:**

- Promise confidentiality or to keep secrets
- Over question them, but try to clarify information
- Ask leading questions, which direct them to certain answers
- Make assumptions or jump to conclusions
- Offer personal opinions or dismiss the claims of the child/person
- Attempt to deal with the problem alone
- Delay in following procedures or in taking action to protect them
- Panic – remain calm.

**Reporting concerns and/or allegations**

All volunteers have a role in the prevention of abuse and a duty to report any suspicion, concern or allegation of abuse. All incidents of suspected or alleged abuse should be acted upon immediately, following the safeguarding procedures of the local church, if established, or by following the procedures of GBM below. See also the *Flowchart for procedure when concerns are raised about a child/person's safety or welfare or if they disclose abuse* (Page 9) which shows what action should be taken.

**In brief:**

- Inform the team leader/GBM leader in charge
- Consult with the church and/or GBM safeguarding designated person and agree a course of action
- If advised by church/GBM safeguarding designated person, inform parents/carers of the concerns
- GBM's Support Centre should be told about the concern for its records and to offer support
- If agreed, in consultation with the designated person, Children's Services (Social Services) or police departments should be informed and their advice followed
- Make a written record of the events, conversations and observations, which should be signed and dated. You can use the *Reporting concerns about a child/person's safety/welfare or they disclose abuse template* available to download for free from the GB leaders' online resource base.
- Support should be offered to the GBM volunteer making the report
- If the allegation of abuse is against a GBM volunteer, follow these guidelines in conjunction with the *Guidelines and procedures for dealing with complaints* (Page 23) specifically noting that there should be no contact between the volunteer and the child/person who may have been abused, until enquiries are completed and an outcome agreed.



## Good practice guidelines

### Volunteers should **always**:

- Seek to promote the Christian faith through their role in GBM in a safe, caring and empowering manner
- Ensure that there's a minimum of two adults aged 18 plus, working with any group of children and young people, one of whom must have completed GBM's equipping training
- Respect the privacy of children and young people in changing rooms
- Ensure that a GBM leader is always present when children and young people are working with external visitors
- Ensure that children are collected by an adult known to the volunteers or by someone authorised by the carer/parent
- Ensure that young people have permission from parents/carers to go to/leave GBM activities on their own, if appropriate.
- Ensure that any joint activities have both male and female supervision
- Promote anti-discriminatory practice in GBM
- Ensure that parental/carer's consent is obtained for transport and activities off-site
- Allow children, young people or adults to discuss a problem with the person with whom they feel most comfortable
- Be consistent and work together as a GBM team.

### Volunteers should **never**:

- Make themselves vulnerable by working alone with a single child or young person
- Invite children, young people or vulnerable adults to their home alone
- Do things of a personal nature for children or vulnerable adults, which they are able to do for themselves
- Have unnecessary physical contact with children, young people and vulnerable adults
- Allow children or young people to use inappropriate language unchallenged
- Tolerate prejudice, discrimination or bullying.

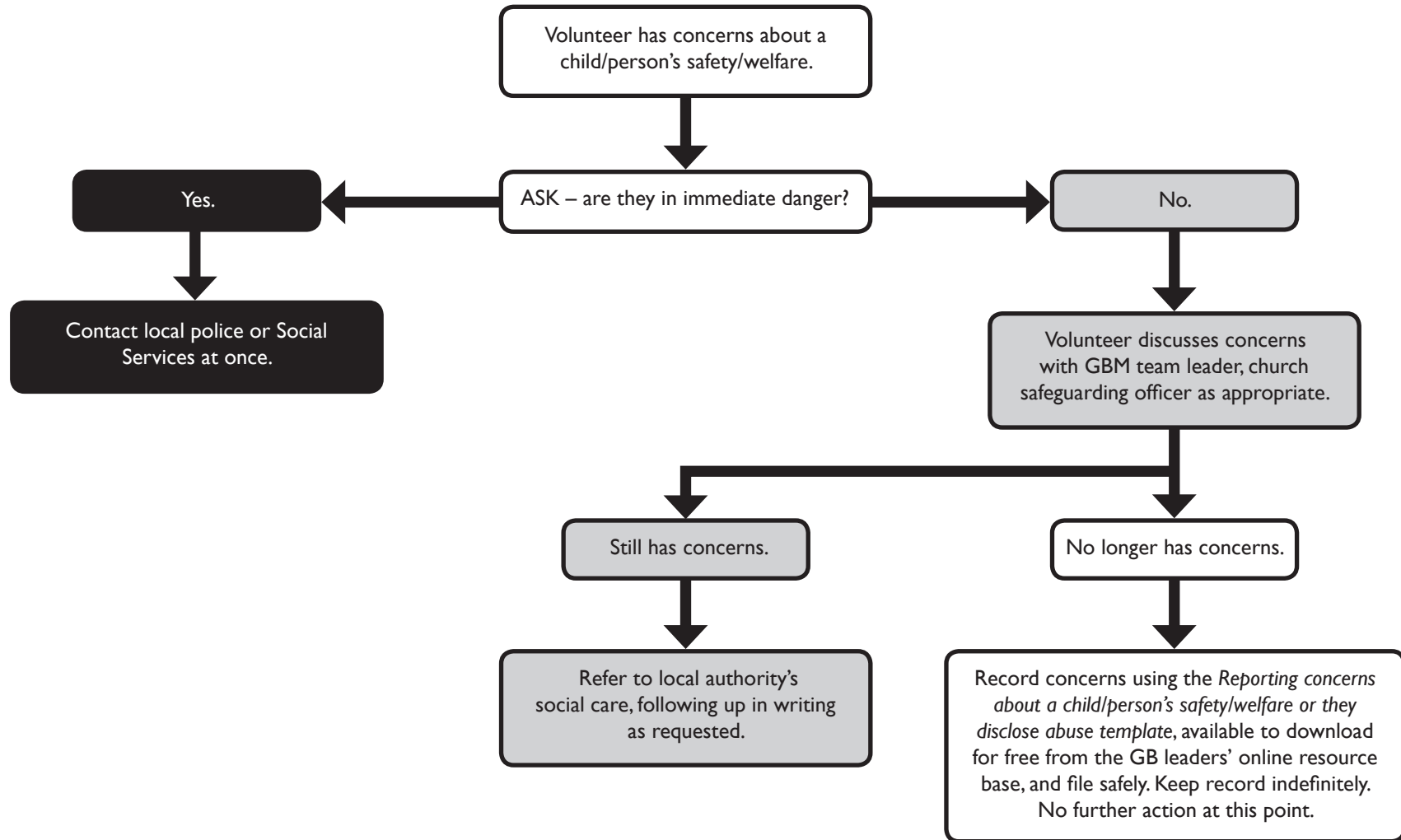
### GB Ministries expects all volunteers to carry out their role:

- In harmony with the guidelines established by the denomination of the churches with whom they are partnering in mission
- In accordance with the guidelines established by GBM
- In an understanding manner and working in partnership with parents/carers
- In co-operation with the professional agencies responsible for the implementation of statutory safeguarding procedures.

Safeguarding procedures in isolation can't protect the welfare of children, young people and vulnerable adults. It's those who access the procedures through the course of their involvement who will collectively contribute to the protection of children, young people and vulnerable adults.



**FLOWCHART FOR PROCEDURE WHEN CONCERNS ARE RAISED ABOUT A CHILD/PERSON'S SAFETY OR WELFARE OR THEY DISCLOSE ABUSE**



**N.B.** Support should be offered to the GBM volunteer making the report.

If the allegation of abuse is against a GBM volunteer, follow these guidelines in conjunction with the *Guidelines and procedures for dealing with complaints* specifically noting that there should be no contact between the volunteer and the child, young person or adult who may have been abused, until enquiries are completed and an outcome agreed.

## **POLICY, GUIDELINES AND PROCEDURES FOR ANTI-BULLYING AND HARASSMENT STRATEGY**

### **Policy statement**

GBM has a duty of care to all its members. Children, young people, volunteers and employed staff have the right to expect that they will not be bullied or harassed. Bullying is a term which arouses many emotions, in particular anger and resentment. It's a behaviour, which occurs in different forms, but is never acceptable. A bully is a person who hurts, persecutes or intimidates another person, either emotionally and/or physically. Harassment and bullying on issues such as sex, race, age, disability, religion, sexual orientation, gender, nationality, or even personal characteristics can affect health, confidence, and morale. GBM believes that bullying is never acceptable.

In order to promote an anti-bullying strategy within GBM:

- Bullying or harassment within GBM will not be tolerated
- It will be the responsibility of everyone to attempt to both prevent and eradicate any bullying or harassment that may occur
- All GBM staff and volunteers will actively model non-bullying behaviour
- Any reported incidents of bullying or harassment will be taken seriously and dealt with promptly, in accordance with GBM guidelines.

### **Guidelines for all volunteers**

In order to demonstrate our responsibility in this respect volunteers should:

- Ensure that other volunteers, children, young people, parents and carers are aware that bullying or harassment will not be tolerated within GBM
- Cultivate a supportive and anti-bullying environment
- Ensure young people and volunteers are encouraged to take responsibility for creating an anti-bullying environment, including outside of GBM activities and on social media
- Minimise bullying and inappropriate comments through adherence to the social media policy
- Ensure that all members are treated with dignity and respect regardless of human condition, age, gender or circumstance
- Encourage the view that reporting incidents of bullying is taking responsible action, rather than 'tale-telling'
- Ensure that reported incidents are dealt with quickly and efficiently
- Establish a system which enables everyone to be able to share information if they suspect that bullying or harassment is taking place
- Include a procedure of written information for those who find it difficult to discuss issues
- Ensure that everyone has the opportunity to speak to someone, to have his/her story heard, realising that the bullied person and the bully are both in need of help
- Decide on the best action to take, for example:



- o Consideration might be given to using the five W questions as a basis for establishing the circumstances of the incident – What? Who? When? Where? Why?
- o Direct the disapproval at the behaviour not at the child/young person/leader
- o Attempt to redirect the exercise of power over others by encouraging the bully to take on a caring or nurturing role
- o Explain that the bullying must stop
- o Bring the bullied person and the bully together, if it's thought that this could contribute to resolving the problem.
- Talk to the whole group about bullying and the importance of GBM being a safe and supportive place for everyone to be
- Encourage the children, young people and adults in their care for one another.

### Procedures

If any case of bullying is reported:

- Make a written report of the incident including perceptions of witnesses, as well as the views of the bully and the bullied
- Note and record the actions taken when bullying is alleged or suspected, such as calling GBM's Support Centre or the police.
- Inform parents/carers of the incident and how it was dealt with
- Take steps to establish a period of monitoring to ensure that the bullying isn't repeated.

### Guidelines for GBM employees

Harassment and bullying on issues such as sex, race, age, disability, religion, sexual orientation, gender, nationality or even personal characteristics, can interfere with an individual's work performance and create a hostile work environment. Harassment and bullying may also occur between employees outside working hours, for example at work related social functions. GBM recognises the problems that harassment and bullying can have upon health, confidence and morale. All employees of the charity therefore, have a responsibility to understand and comply with the policy statement recorded above at all times. It's also the responsibility of all employees to report any harassment or bullying that they're aware of within the work place to the Director or to the Chair of the GBM Trustee Board.

For staff employed by GBM, clear protocol for how to deal with cases of alleged harassment or bullying in the work place is outlined in the *Staff Handbook*. This includes:

- The definition and identification of workplace harassment and bullying
- The responsibilities of managers and supervisors when aware of harassment/bullying
- The process to follow if staff feel they're subject to harassment – this includes the reporting process and details of both informal and formal complaints and disciplinary processes available
- The legal and contractual implications involved in any cases of harassment and bullying.



## POLICY, GUIDELINES AND PROCEDURES FOR APPOINTMENTS

### Policy statement

Within GBM there is a large number of ‘workers’ – some are staff employed by the charity, but most are volunteers working within local settings. In all cases GBM will endeavour to safeguard the children and young people with whom it works by following carefully laid down procedures for their appointment. Once appointed, both employees and volunteers will be given appropriate initial and ongoing training, relevant support and the necessary supervision to equip them for their task.

### Procedure for the appointment of volunteers

In GBM, adult volunteers are defined as anyone who is 18 years of age or older. All adult (18+) volunteers desiring to work, on a regular basis, as part of a GBM team should:

- Agree their involvement in GBM with the church of which the GBM team is a part, as the church needs to approve the appointment and ensure relevant references are secured if appropriate (use the *Character reference request template* available to download for free from the GB leaders’ online resource base)
- Be equipped for their role using the **n:fluence 18+** equipping material. This training will need to be arranged and delivered by the appropriate people e.g. the district team leader and/or designated trainer(s)
- Apply for, and obtain, an enhanced DBS check through the church or GBM
- If possible, work in the local group under the supervision of registered and trained GBM volunteers while completing the relevant modules from **n:fluence 18+**
- Visit, observe and learn from children’s/youth work in another context e.g. a different GBM group or an alternative youth/children’s work within a church setting
- Identify, with the help of other GBM team members, a local leader who will support and informally mentor them as they settle and grow in their new role
- Complete the *Volunteer Registration Form* and return it to GBM’s Support Centre, confirming the receipt of a satisfactory enhanced DBS disclosure, the completion of the relevant modules from **n:fluence 18+** and the church’s confirmation of the appointment
- Receive confirmation, from the GBM’s Support Centre, that they’re registered as leaders. This may be celebrated with a special church service or presentation evening
- Emerging leaders aged 16 plus, actively working with children, also need to obtain an enhanced DBS disclosure.

### Guidelines

For clarity and explanation the following should be noted:

- All volunteers will need to undertake the safeguarding modules from **n:fluence 18+** or from their local church, if they’re volunteering in GBM after their 18<sup>th</sup> birthday
- All new volunteers are required to undertake the relevant parts of the **n:fluence 18+** equipping materials
- The **n:fluence 18+** resource provides the following modules of training:
  - o Mission
  - o Children/young people
  - o Pastoral care



- o Relationships
- o Programme
- o Leadership (for team leaders).
- Some modules/units are compulsory, others may be chosen according to the role which the volunteer will undertake (or the skill that they already have). Please refer to the **n:fluence 18+** equipping guide for more information
- Those with previous experience/training/professional qualifications may be exempted from certain modules. All exemptions should be noted and the reason for the exemption recorded
- Volunteers are expected to participate in ongoing development and equipping opportunities, to help ensure that activities are relevant and that good practice is developed in their work among children and young people i.e. volunteers should engage with the **Gather, Grow and Go** process – as detailed on our website
- Specialised equipping is available for areas such as Residential Events
- Ongoing support, training and nurture is provided for all leaders in local, regional and national spheres and, where appropriate, is advertised on GBM's websites and social media
- Those elected to serve on the GBM Trustee Board and GBEW Network Executive receive induction training.



### Procedure for the appointment of staff

- When a staff vacancy arises, job descriptions will be drawn up.
- The post will be advertised via the GBM websites and relevant local and Christian press with a closing date of not less than 15 days from the placing of the advert.
- All applicants will be required to complete an application form.
- Once the closing date is passed, a short-listing process will take place.
- Throughout the appointment process, GBM will adhere to its equal opportunities policy.
- At interview all applicants will be asked a set of questions and will undertake a task as appropriate to the role.
- Interview panels will include senior staff as relevant to the role.
- Reasons for non-selection of candidates will be clearly identified and might include:
  - o Poorly completed application form/withdrawn application
  - o Lack of relevant experience/qualifications
  - o Inability to demonstrate professional or technical ability
  - o Inappropriate attitude/demeanour
  - o Communication or language difficulties/medical grounds
  - o Poor interview performance/unsatisfactory references.
- Once a candidate is selected for appointment, references will be taken up.
- If satisfactory references are received, a conditional, formal offer letter will be given.
- At the same point the person will start an enhanced DBS check, which needs to show that the person is acceptable for the position.
- All employees will be given an induction plan which covers items such as health and safety, job specific elements and expectations and will be overseen by the line manager in consultation with the Director.
- Each employee is responsible to a line manager with whom update meetings are held to establish work patterns and monitor work load.
- An ongoing appraisal programme is used to provide support, monitor performance, assess training needs and measure competency.



## GUIDELINES AND PROCEDURES FOR SAFE PRACTICE IN GBM ACTIVITIES

### Contextual statement

GBM's activities are many and varied, taking place in a range of contexts. Such activities may be categorised under the following three headings:

- **On-site programmes**
- **Off-site day activities**
- **Residential Events.**

When planning activities in the local, district, regional or national spheres in any of these contexts, safe practice must be ensured by giving due note to each of the following four areas:

- **Supervision levels**
- **Roles and responsibilities**
- **Health and safety concerns**
- **Administrative procedures.**

The following guidelines are designed to help with this.

### Supervision levels

#### Guidelines for **on-site activities**:

- It's never possible to give a global ratio for supervision as supervision levels should be determined in relation to the number, age, circumstances and status of members present
- Consideration should also be given to the layout of the building and nature of activity being undertaken
- Note should be taken of the guidance given by the church where the group meets regarding recommended minimum adult to child ratios
- Ensure that a single adult is never left working with a lone child and that whenever possible there is more than one leader with a group
- Never leave children or young people unattended
- There should be a minimum of two trained volunteers on site at all times and whenever possible at least three over 18s should be present
- Where there are girls or young women in a group at least one female volunteer should be present; male leaders should not be left alone with a group of girls
- Where there are mixed gender groups, both male and female leaders should be present.

#### Guidelines for **off-site activities**:

- Increase the numbers of volunteers for all off-site activities
- Assign groups of children and young people to specific leaders for the duration of the visit/event
- Systems should be established for regular head counts throughout the day
- When travelling in a minibus, the driver should be accompanied by an additional adult for supervision but please note this should not be two family members or a husband/wife. If your church requires stricter protocol than this then you should follow their guidance





- When travelling in cars, whilst acting in your capacity as a GB leader, there should always be two adults present but please note this should not be two family members or a husband/wife. If your church requires stricter protocol than this then you should follow their guidance.
- Ensure you're up-to-date with the latest seatbelt and child car seat regulations.

#### Guidelines for **Residential Events**:

- Observe the minimum supervision levels for Residential Events detailed in the *Residential Events Toolkit* i.e. a minimum of three leaders (two of whom should be female) are required for any Residential Event.

### Roles and responsibilities

#### Guidelines for **on-site activities**:

- The person in charge should be clearly defined and known to all
- All volunteers should have a clear understanding of their roles and responsibilities
- Leaders should be responsible for planning, facilitating and delivering an age appropriate programme to their group
- A named first aider should be identified, if possible with a first aid or similar qualification
- Volunteers should understand the GB process for referral if a concern or allegation is raised (see *Flowchart for procedure when concerns are raised about a child/person's safety or welfare or if they disclose abuse – Page 9*)
- Volunteers should all have undertaken training relevant to their role and should be encouraged to undertake ongoing general training to enable them to develop and remain relevant and up-to-date in their approach
- Where specialised expertise is required volunteers must hold the appropriate qualification or experience (e.g. trampolining, first aid, expedition work).

#### Guidelines for **off-site activities**:

- Clear criteria must be prepared to ensure people know who is taking responsibility for the children and young people at which points of time
- Lists of volunteers with their defined responsibilities should be prepared/agreed by the event organiser and distributed to all relevant personnel prior to the event.

#### Guidelines for **Residential Events**:

- Those wishing to take children or young people on Residential Events must undertake Residential Event training for indoor or outdoor events, as appropriate, and refresh this training every five years
- Those responsible for catering must hold a relevant food hygiene qualification.

### Health and safety concerns

#### Guidelines for **on-site activities**:

- The owners of the building in which you meet have a 'duty of care' to ensure the premises are safe for use
- The team leader has a responsibility to make regular risk assessments of the premises in relation to the activities that will be undertaken and record these using templates available in the *Delivering an Evening's Programme Toolkit*



- The position of all fire extinguishers, fire blankets and fire exits should be checked and all participants informed about fire drill arrangements
- Make sure all exits are unlocked and that none are blocked
- Where electrical equipment is used ensure the necessary safety checks have been undertaken and that cables are not trailed around the room
- Ensure any area where building/structural work is being undertaken is screened off for safety
- Ensure the safe use of dangerous implements e.g. scissors, knives, needles, cookers
- Where physical activities are undertaken ensure furniture is safely arranged, windows are protected and appropriate footwear/clothing is worn
- Maintain effective discipline to ensure physical and emotional safety as detailed in the *Delivering an Evening's Programme Toolkit*
- Establish a system for registration and monitor the dropping off and collection of children/young people at the beginning and end of the programme
- Ensure all volunteers are aware of any potential health problems/food allergies relating to members
- If any member may need emergency treatment ensure all relevant personnel are suitably trained to administer this
- A *Hazardous Activity Form* should be completed if necessary.

#### Guidelines for **off-site activities:**

- The team leader has a responsibility to make regular risk assessments of the activities that will be undertaken and record these using the templates available in the *Delivering an Evening's Programme Toolkit* and *Residential Events Toolkit* – both available to download for free from the GB leaders' online resource base
- Details of fire drill and evacuation procedures should be made clear to all at the beginning of the event
- Any specialised equipment must be checked for safety e.g. trampolines
- Where roads are to be crossed, cross as a group and observe the Green Cross Code and Highway Code as they relate to pedestrians
- Reflective jackets are useful if travelling at night
- Minibus drivers should check the road worthiness of the bus, complete any relevant minibus training, and ensure they have a minibus permit issued by GB showing you have insurance covering the people on the bus
- Current regulations regarding the use of seat belts, booster cushions and other safety restraints should be adhered to
- On coaches, all passengers must have a seat with a seat belt, where possible front seats, the rear middle seat and seats next to emergency exits should not be occupied by children or young people
- Volunteers should sit next to exits on trains, buses etc.
- Give due care to boarding and dismounting vehicles
- A *Hazardous Activity Form* should be completed if necessary.

#### Guidelines for **Residential Events:**

- Appropriate risk assessments should be completed using the *Residential Events Toolkit* and the event should be registered with GBM's Support Centre using the *Residential Events Registration Form*
- A Residential Event meeting with parents/carers must be held to inform them of arrangements



- Male and female sleeping, washing and toilet facilities should be separate
- If you have over 18s or under 18s who are transgender then they should use the sleeping, washing and toilet facilities for the gender that they are legally biologically. However, to be sensitive, if an accessible toilet is available they could use this. Please call the GBM Support Centre for advice if needed on this issue.
- A smoke alarm should be positioned in the kitchen area
- Do not overcrowd rooms - ensure exits and passageways are kept clear
- Parents/guardians should be informed of any patent medicines that may be used
- All medication should be locked away
- Any medication given or first aid administered should be recorded in the medical book
- Ensure stairs and passageways are lit at night
- Lock the building at night and ensure the key is in an accessible place known to all volunteers
- Inform police and fire brigade of the dates you're inhabiting a building
- Observe all food hygiene regulations
- Relevant fire precautions, fire buckets etc. must be in place on an outdoor camp site
- A *Hazardous Activity Form* should be completed if necessary.

### Administrative procedures

#### Guidelines for on-site activities:

- All volunteers should have completed the relevant registration process with GBM's Support Centre including the required DBS clearance
- A signed *Residential Events Health/Consent Form* detailing emergency contact details, health and allergy concerns, should be obtained for each child or young person and updated annually. These forms should be kept indefinitely – see the data protection policy section on Page 29
- An accurate register of attendance should be kept to ensure numbers present are recorded
- Remember you need to keep accounts and anything which includes a financial transaction for seven years. Registers must be kept forever. Insurance claims may be made up to the age of a child being 18 and it may be necessary to prove who was at your group on any given day
- Any incidents, accidents, complaints or grievances should be recorded, dated and reported to the team leader or other appropriate person
- If consent forms are lost we could be sued for a breach of data protection so ensure they are kept somewhere secure – see the data protection policy section on Page 29
- If a high risk activity is being undertaken the relevant *Hazardous Activity Form* should be completed and returned to GBM's Support Centre prior to the event to ensure the required insurance cover is in place
- Any monies collected should be counted, recorded and receipted as appropriate and the money kept securely
- The relevant risk assessment using the *Delivering an Evening's Programme Toolkit*, should be recorded, actioned and filed.



**Guidelines for off-site activities:**

- If using a minibus, a minibus permit should be displayed in the vehicle. A minibus permit issued by GBM shows you have insurance covering the people on the bus
- If private cars are used ensure drivers have an up-to-date licence, MOT and fully comprehensive insurance. Advise parents or volunteers to check with their own insurance company that there are no restrictions on using their cars for this purpose. When travelling in cars, whilst acting in your capacity as a GB leader, there should always be two adults present but please note this should not be two family members or a husband/wife. If your church requires stricter protocol than this then you should follow their guidance
- Parents/carers should sign a consent form affirming that their child may attend the off-site event
- Ensure that emergency contact information such as the *Annual Consent Form* for each member of the group, including a parent/carer contact number for the day, are carried to the event and on any day trips
- Clear guidelines for behavioural expectations and rules of conduct for the event should be explained to all attending
- A designated first aider should be assigned for the event
- All participants should sign in/out to ensure a record of those on site is readily available
- No swimming should take place without a qualified life saver.

**Guidelines for Residential Events:**

- Leaders should register the event with GBM's Support Centre by completing and returning a *Residential Events Registration Form* at least six weeks prior to the event
- Registration forms received less than three weeks before the event may not be authorised as DBS checks take a minimum of three weeks
- Parents/carers should complete and return a *Residential Events Health/Consent Form* prior to their child attending a Residential Event and these forms should be kept indefinitely – see the data protection policy section on Page 29
- Local police and fire services should be advised if premises are used for Residential Events
- Contact should be made with the local doctors prior to the event in case their services are needed
- One night sleepovers on own premises require registration and guidelines for sleepovers are available to help ensure safe practice – these are detailed on the *Sleepover Registration Form*. A risk assessment must be completed
- GBM insurance covers people not property and only while you're on a Residential Event. Additional insurance is required to cover people in the run-up to an event or for specific equipment.



## POLICY, GUIDELINES AND PROCEDURES FOR SAFE PRACTICE

### Policy statement

GBM is committed to ensuring that all activities offered to children or young people are provided within safe, secure and empowering environments. It realises the importance of maintaining safe practice in all it does and therefore believes that volunteers should take precautions to minimise or prevent harm.

Realising that risk assessment is a careful examination of what could cause harm to members, volunteers or others. GBM believes that:

- Each GBM team should conduct and record a risk assessment of activities in the premises used
- Additional risk assessments should be conducted when a new activity starts e.g. a new programme module, an end of term party or a fundraising event
- Additional risk assessments should be conducted when any off-site activity or hazardous activity is undertaken and a *Hazardous Activity Form* completed if necessary.

### Contextual statement

The Management of Health and Safety at Work Regulations 1999 requires that a formal 'Risk Assessment' should be carried out. The risk assessment should be a suitable and significant assessment of the risks to the health and safety of all persons involved directly in any activity.

### Guidelines

- It's a requirement to keep a brief, simple record of all risk assessments and GBM provides further guidance in the publications *Residential Events Toolkit* and *Delivering an Evening's Programme Toolkit* which provide some generic risk assessments and templates to complete and both are available to download for free from the GB leaders' online resource base.
- A 'hazard' is anything which would cause harm e.g. a departure/assembly point on a busy road, an overcrowded church hall or a slippery slope.
- A 'risk' is the chance, however small, that someone may be harmed by the hazard e.g. a child stepping from behind a vehicle into a busy road.
- The team leader's role (and other volunteers) is to decide whether a hazard is significant and whether it's covered by appropriate precautions in order to eliminate or minimise the risk.
- All volunteers should be involved in the assessment as it helps to raise awareness and ensures that everyone understands why things are being done a certain way.
- Keep the risk assessment simple and use common sense in thinking through the event/activity in a logical sequence to establish what each phase of the visit, journey or activity involves.
- Identify what might go wrong and who may be harmed or affected by the risk. Then think about what precautions should be taken.



- Keep the record indefinitely for future reference and to save time and effort if an activity is repeated, although risks will still need to be re-assessed – see the data protection policy section on Page 29.
- For each activity give consideration to supervision levels, roles and responsibilities (including training requirements, pastoral care, spiritual development, health and safety concerns, security, health and hygiene and travel safety).
- Complete any administrative procedures designed to safeguard your practice as detailed in the guidelines that follow.
- Risk assessments should be dated and kept as historical documents indefinitely as they are evidence that due care has been taken in running any activity
- Activities deemed hazardous need additional insurance and so a *Hazardous Activity Form* should be completed. This is free to download from the GB leaders' online resource base.



## POLICY AND GUIDELINES FOR EQUAL OPPORTUNITIES

### Policy statement

GBM is a mission movement which partners with Christian churches to undertake children's and youth work. Its leaders are women and men who are either members or adherents of the church, or supporters of the ethos and aims of GBM. In keeping with its charitable objects the work of GBM is focussed primarily towards girls and young women.

GBM is committed to the fair treatment of its members, both actual and potential, and aims to promote policy and practice that does not discriminate but empowers members to be part of God's restoration in the world.

Through the equipping of volunteers, GBM seeks to ensure that those involved in work for and with children and young people promote positive attitudes toward all groups and individuals with whom they have contact. This commitment extends to all employed staff, volunteers, committee members and trustees regardless of colour, race, nation of origin, gender, religion, sexual orientation, responsibilities for dependants, marital status, age, disability, ability or background. GBM is committed to encouraging and equipping each member to explore, identify and utilise their God-given gifts and to providing opportunities for each person to fulfill their potential as the person that God created them to be.

### Guidelines

The policy above is a statement only and it's for the organisation, its trustees, staff, committees and individual groups and districts to demonstrate the implementation of this policy in the pursuance of all GBM activities, equipping and work.

In order to outwork this policy GBM:

- Is committed to the principle of equal opportunities in the recruitment and selection process of both employed staff and volunteers
- Acknowledges the crucial role of equipping and development for staff, volunteers and trustees in order to enhance personal growth and to help enable the mission and vision of GBM to be realised
- Will aim to ensure that all written or visual material produced by, or on behalf of GBM, uses non-discriminatory language
- Will aim to ensure that the principle of equal opportunity is evident in advertisements for staff posts, material sent to staff, volunteers and trustees and in all promotional materials
- Will aim to ensure that its activities, equipping, support and administrative services are accessible and relevant to the needs of all its members.



Employed staff, volunteers and trustees will be expected to:

- Be committed to GBM's equal opportunities policy
- Ensure that all possible arrangements are made to cater for any special or additional needs in order to allow members to fully participate in activities
- Display a non-judgemental attitude
- Respect diversity.

In local groups, volunteers will, in consultation with their church, be committed to:

- Ensuring that no member is discriminated against either directly or indirectly. This may be manifested in many ways, for example:
  - A child/young person/volunteer being rejected because of their colour
  - A child/young person being laughed at because they can't do something
  - A child/young person/volunteer being bullied
  - A non-athletic child/young person being left out when teams are chosen
  - A socially deprived child/young person being unable to afford a trip
  - A young person being excluded from receiving badges or opportunities such as training
  - An unmarried woman being excluded from wearing GB uniform because she's pregnant
  - A transgender young person being told they can't come to camp
  - A child/young person being bullied because they're gay.
- Challenging any discriminatory behaviour whether this be other volunteers, GB members or visitors
- Giving due consideration to the requirements of those who have special or additional needs. This may require:
  - Adapting language when talking to a child with communication difficulties
  - Moving an activity to a different room to facilitate a wheelchair user
  - Using a bean bag instead of a ball in games to assist a dyspraxic child
  - Using a loop system to facilitate the hard of hearing
  - Using **n:vestigite** signs, or providing a timeline of the programme and routine, for the meeting to aid a child with Asperger's Syndrome.





# GUIDELINES AND PROCEDURES FOR DEALING WITH COMPLAINTS

## Policy statement

All volunteers are trained to enable them to be effective and equipped to work with children and/or young people in their care. However, although GBM volunteers seek to do their best for the members of the group(s), occasionally members, parents/carers or church members may question the actions that they have taken. In such circumstances, any allegations or concerns should be raised with the team leader in charge of the event or group. Such concerns or allegations should be taken seriously, dealt with promptly and with fairness and equality. As volunteers are appointed by the local church, any resolution of a local incident remains the responsibility of the relevant church. GBM's Support Centre team, however, is always available to the church and GBM team for consultation, support and prayer.

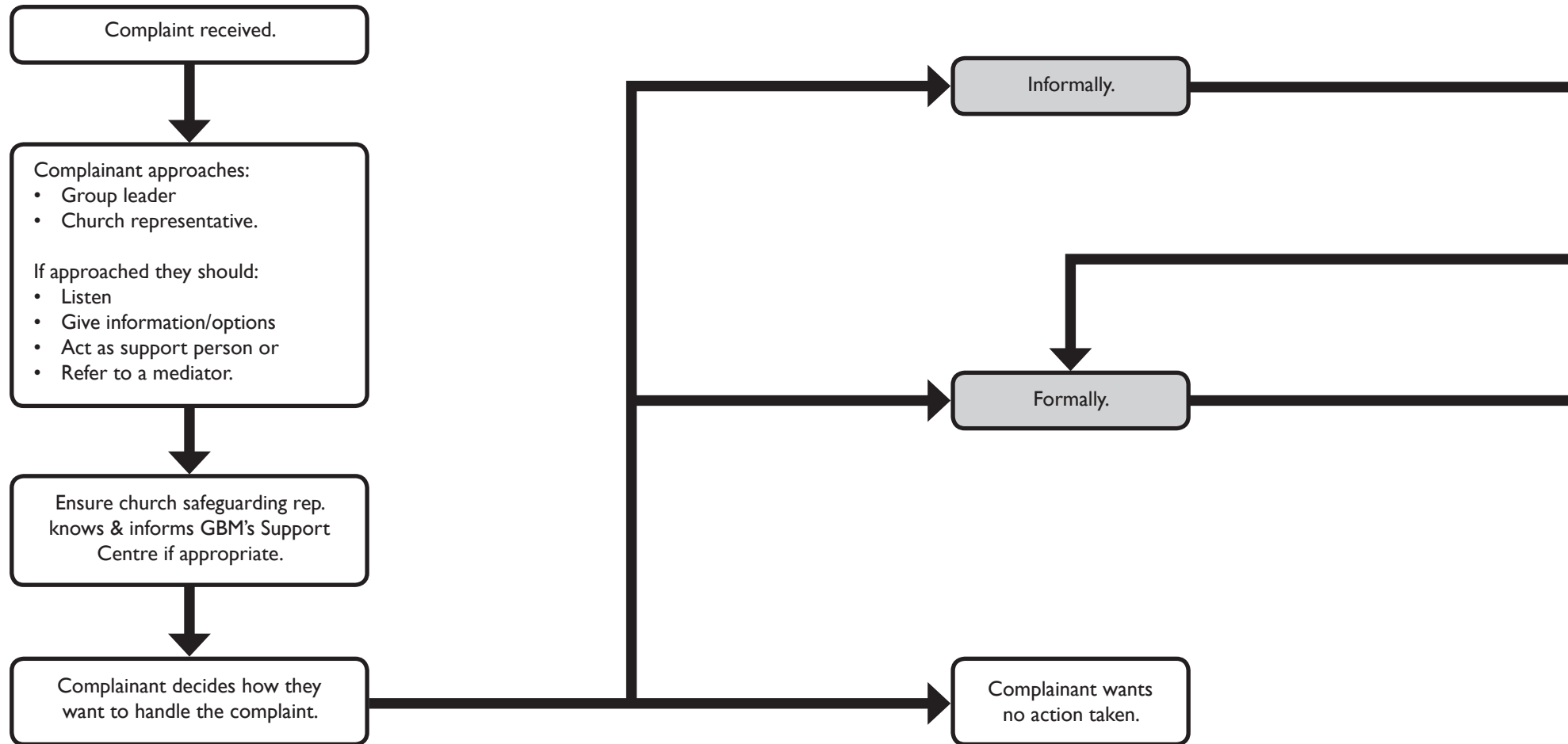
## Guidelines

- If a parent/member/child/young person or church member makes an allegation against a GBM volunteer or group, it's important to address this without delay.
- The allegation should initially be reported to the team leader in charge of the event/group.
- If the allegation is against the team leader then contact should be made with the leadership of the local church.
- If the allegation relates to a district, regional or national event then there will be a designated named person to whom the complaint should be made.
- There should be no contact between the volunteer and the child or person making the allegation until enquiries are completed and an outcome agreed.
- Appropriate support should be offered to the volunteer against whom an allegation has been made.
- Although each set of circumstances will be unique, the following is a guide to best practice:
  - Obtain a full written account of the alleged incident/concern from each person involved using the *Responding to complaints template* available to download for free from the GB leaders' online resource base
  - Where verbal accounts are given ensure these are duly recorded and signed (using the actual words spoken and not a translation of what was said)
  - Report the incident to the relevant church official, safeguarding representative or minister
  - Seek a meeting of those involved with the chaplain of the GBM team or an impartial chairperson, to openly discuss the issues and look for resolution
  - Attempt to resolve the problem by mutual agreement
  - Document the process/outcomes for future reference and look for lessons to be learned for the future
  - Plan a follow-up to review any changes made.
- Where this process is not successful, advice may be sought from the local district or regional church network.
- If the matter can't be resolved in this way, it may be referred to GBM's Support Centre in order that the formal complaints procedure can be instigated or advice given.
- Advise the person bringing the allegation of their right to make a complaint to police or Social Services.
- See also the accompanying *Flowchart for responding to complaints* (Pages 24-25).



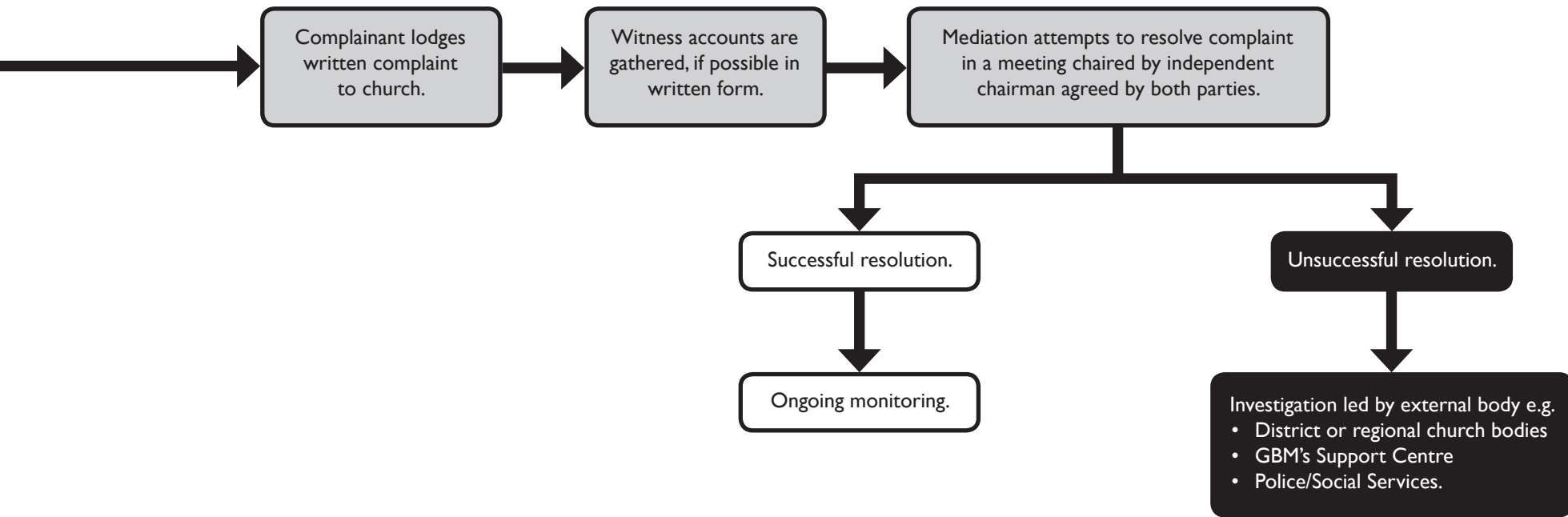
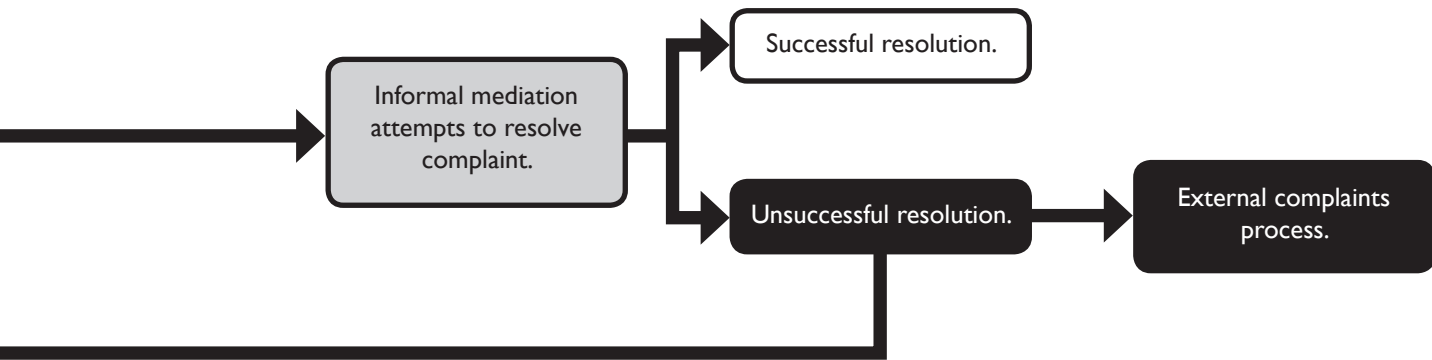
## FLOWCHART FOR RESPONDING TO COMPLAINTS

If a complaint is made against a GBM volunteer or group the following flowchart may be used to ensure correct procedures are followed.



Please note:

- Full written records should be kept indefinitely of all processes followed. You may wish to use the *Responding to complaints template* available to download for free from the GB leaders' online resource base.
- There should be no contact between the volunteer and the child or person making the allegation until enquiries are completed and an outcome agreed.



## POLICY AND GUIDELINES FOR USE OF INFORMATION TECHNOLOGY AND SOCIAL MEDIA

### Policy statement

Information technology and social media have an increasingly significant part to play in GBM life. In order to ensure the safety of members and the integrity of GBM, GBM is committed to ensuring that all volunteers are advised in the safe use of IT and social media. GBM acknowledges the popularity, opportunities and hazards of the internet and social networking sites as a common form of communication and information gathering today. Inevitably, information technology and social media have an increasingly significant part to play in GBM life. GBM volunteers are in a position of trust among children and young people and the relational approach to our work means that we have contact with young people on a GBM evening and, at times, beyond. GBM is committed to modelling and practicing positive relationships and communications that value, nurture and protect children and young people through open, accountable and safe practices and in a way that reflects our Christian ethos.

### Guidelines

The following guidelines are provided to assist leaders in the responsible use of IT and social media.

#### Use of pictures and videos:

- Pictures of GBM members under 18 years of age may only be taken for personal or publicity purposes if parental consent has been received. This may be sought using the *Annual Consent Form*, which should be kept indefinitely – see the data protection policy section on Page 29
- Pictures of young people should only be taken if a second adult is present
- The content of pictures should be considered for good taste e.g. all children and young people featured in photos or recordings must be appropriately dressed and, where possible, group photos are preferable to individual shots
- Care should be taken when identifying children and young people (under 18 years) by name in publications. It's good practice to avoid using surnames but if the full name is to be printed then parental consent will need to be obtained
- No personal details such as email or postal addresses, telephone or mobile numbers should be revealed. Addresses should never be given out and care should be taken to avoid pictures clearly showing where the young people come from (e.g. easily read group names)
- Parents of children may use cameras to take photos of their own children at GBM events but should be advised that these are for personal use and that if other children appear in the pictures they shouldn't be displayed in any publicly accessible space, including the internet or any web-based site
- Some churches require their groups to follow conventions such as only taking photos on a specified camera and keeping any images in a locked, secure place. Local groups should ensure that they comply with their local church policies. If the local church doesn't have a policy then they should ensure that they comply with the GBM policy.



### GBM websites and Facebook pages (for publicity purposes only):

- It's the policy of GBM to safeguard the welfare of all members by protecting them from physical, sexual and emotional harm. It's essential that anyone creating a website follows a few simple guidelines designed to ensure the personal safety of children and young people. GBM doesn't want any sites to be used as a method for people with wrong intentions to develop contacts with children
- All guidance relating to the use of pictures and videos also applies to images on a website
- Don't use copyrighted information or graphics from other websites instead use royalty free images or your own digital photographs
- Be aware that libel laws affect all forms of written media including information on websites and social media. Any statement may be libellous if it's defamatory of anyone i.e. if it tends to a) expose them to hatred, ridicule or contempt; b) cause them to be shunned or avoided; c) lower them in the estimation of right-thinking members of society generally; or d) disparage them in their business, trade, office or profession
- Always use the official registered GBM logo or GB crest and logo, unaltered e.g. no change of colours, font or wording. If re-sized, maintain the proportion of the logo so that it's not distorted in any way. The GB crest and logo can be downloaded from the GB leaders' online resource base
- Ensure all information is up-to-date and consider the tone of language and vocabulary being used. Ensure your content is:
  - o **Relational** – engaging with the audience in a warm and friendly manner
  - o **Relevant** – can be understood by those visiting the site
  - o **Responsive** – meeting the needs of/telling the audience what they need to know.

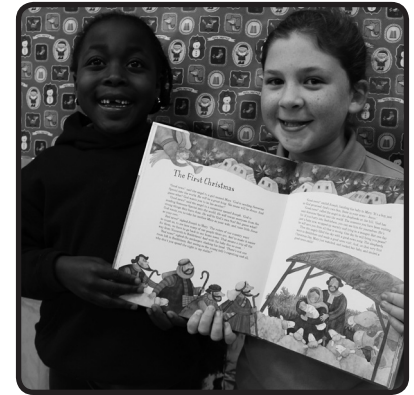
### Social media:

Although it's GBM's practice not to make one-on-one connections with young people through social media it's acknowledged that this is a useful communication tool. It's expected that each group will find its own way of using social media to communicate within the law and in a way that is a positive, safe experience for all members of the GBM group.

The following guidelines relate to the use of Facebook and are made, therefore, to ensure safe practice.

GBM expects that leaders and young people involved in GBM communicate on Facebook via a corporate account, not through personal, individual accounts. This can be achieved by applying the following principles:

- Set up a group/district group Facebook account to make connections with young people (under 18s) thus avoiding inappropriate one-to-one interactions through private social media/Facebook accounts
- Apply a 'closed' or 'secret' group setting when you set up and maintain your group. This will keep all content outside the public domain
- Ensure that one (or more) trained volunteers (18+) act/s as administrator/s for the GBM Facebook group taking responsibility for approving new members to the group
- Post all information – news, events, information and reminders on the wall, thus avoiding inappropriate one-to-one private/inbox messages
- Keep up-to-date with Facebook/social media policies e.g. age, privacy settings etc., noting that at present Facebook, Twitter, Instagram and Snapchat require all users to be over the age of 13 years



- The administrator should be responsible for the addition of photographs (following the above guidelines for good practice) and additionally ensuring that no picture is ‘tagged’ or used as a personal profile picture
- Be aware that even though volunteers’ private social media accounts are not used for one-to-one connection with GBM members, they may be open to public view. Ensure that what is seen or read reflects the values and ethos that volunteers in GBM profess
- To engage the group in good practice, involve the young people in creating a positive code of conduct relating to behaviour, purpose, management, setting, monitoring and use of the site.

**Mobile phones, texting and email communication:**

Mobile phones may make a positive contribution to the safety and welfare of young people and workers, particularly when an emergency occurs. However, there are clear good practice and child protection issues in relation to the appropriate use of mobile phones and other electronic forms of communication:

- Volunteers should only use a designated GBM phone to contact young people and should not give out their personal/private number(s) or email addresses
- Group texts or group emails may be used to communicate information about programmes or activities related to the group; always include another adult in the distribution list and ensure that you have specific consent to contact young people and people in this manner – see the data protection policy section on Page 29
- Ensure that the language used is clear and appropriate and cannot be misinterpreted e.g. never use terms such as ‘love’ or ‘xxx’ to end messages
- Be aware of the time when texts or messages are sent and avoid communicating early in the morning or late at night
- Generally avoid contacting individual young people by phone, text or email. If necessary this should only be undertaken with parental/guardian knowledge or consent
- Texts and email communications should be saved and not deleted
- Make sure images, if sent, are appropriate and that any hyperlinks do not lead to inappropriate content
- The use of mobile phones for photography and video should be subject to the guidelines on the use of photography and digital images. Parental consent is required to use mobile phones for these purposes and for any subsequent reproduction of recorded digital images
- Making/taking phone calls or sending and receiving text during a session is discouraged as it compromises the volunteers’ ability to supervise effectively.

**Internet use:**

- The internet may be used with members to support group activities
- Volunteers should be familiar with both the opportunities and the dangers of the web
- Ensure the computer is loaded with up-to-date internet security that includes anti-virus and anti-spam software
- Members accessing the internet during GBM activities should be supervised so that volunteers have sight of the screen at all times
- When using a website as part of the group’s activities check before hand to ensure that the material being accessed is appropriate for the age group taking part
- If children and young people are given access to undertake their own searches on the internet use search engines which have been recommended by the DfE.



# DATA PROTECTION POLICY

## Introduction and purpose

GBM needs to gather information about individuals in order to fulfil our aims and objectives. This policy describes how the data should be stored, handled and collected to meet the organisation's data protection standards and comply with data protection legislation.

## Purpose

The purpose of this policy is to ensure that:

- GBM can comply with data protection legislation, including the Data Protection Act 1988 and the EU General Data Protection Regulations that come into force in May 2018, and good practice
- It respects the rights of individuals including staff, volunteers and members
- GBM is open about the information it holds, and how it stores and processes individuals' data
- GBM's staff and volunteers are trained and supported
- GBM is committed to notifying the Information Commissioner in the event of a data breach.

## Data Controller

The Data Controller is The Girls' Brigade England & Wales, Cliff College, Calver, Hope Valley, Derbyshire, S32 3XG.

## Data Protection Officer

The Data Protection Officer is GBM's Finance & Governance Co-ordinator who can be contacted at the address above.

## Data Protection Principles

The Data Protection Act 1988 and the EU General Data Protection Regulations 2018 (GDPR) describe how an organisation should collect, process and store personal information. This applies to both electronic and paper-based data.

The Data Protection Act is underpinned by eight principles, these are that data:

- Must be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Processed in accordance with the rights of data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.



The GDPR are underpinned by seven principles, these are:

Lawfulness, fairness and transparency	Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject
Purpose limitation	Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
Data minimisation	Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
Accuracy	Personal data shall be accurate and, where necessary, kept up to date
Storage limitation	Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
Integrity and confidentiality	Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
Accountability	The controller shall be responsible for, and be able to demonstrate, compliance with the GDPR

### Scope

This policy applies to:

- The GBM Support Centre
- All regions and districts of the GB England & Wales Network
- All staff and volunteers
- All contractors and suppliers.

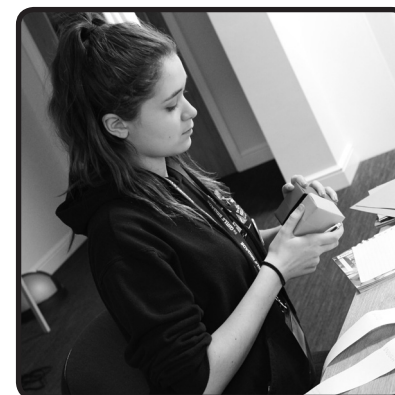
Local groups should ensure that they comply with their local church policies. If the local church doesn't have a policy then they should ensure that they comply with the GBM policy.

### Key risks

GBM has identified the following potential key risks:

- Breach of confidentiality and data being given out inappropriately
- Individuals not being sufficiently informed about the use of their data
- Misuse of personal information by staff or volunteers
- Failure to keep information up to date
- Poor IT security
- Security of information held off site by staff, volunteers and trustees.

If a breach of data security is suspected or occurs this should be notified immediately to the Data Protection Officer at the GBM Support Centre.





## Responsibilities

Everyone has a responsibility to ensure that data is handled and processed as set out in this policy but some people have specific areas of responsibility:

- **The Trustee Board** is ultimately responsible for ensuring that the organisation meets its legal obligations
- **The Data Protection Officer** is responsible for:
  - Keeping the Trustee Board updated about data protection responsibilities, risk and issues
  - Reviewing data protection procedures and policies
  - Arranging training and advice for people covered in this policy
  - Handling data protection queries from staff, volunteers and anyone else affected by this policy
  - Responding to requests from individuals to see the data that the GBM Support Centre holds about them. These are called Subject Access Requests
  - Ensuring that any contracts or agreements with third parties who may handle data comply with GBM's policies and procedures.
- **The Director and Media Co-ordinator** are responsible for:
  - Addressing any queries from the media
  - Approving data protection and consent statements on publicity materials, letters and other communication methods.
- **Staff and volunteers** are responsible for ensuring that they've read, understand and accept the policies and procedures that relate to personal data and how they may handle this in the course of their roles.

Significant breaches of this policy will be handled under GBM's disciplinary procedures.

## Personal data and processing

GBM processes personal information to:

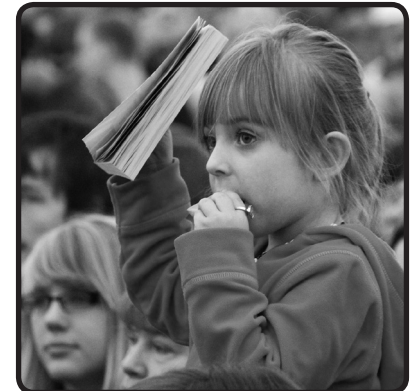
- Provide a voluntary service for the benefit of the national public as specified in our constitution
- Administer membership records
- To fundraise and promote the interests of the charity
- Manage employees and volunteers
- Maintain our accounts and records.

We may hold information on our:

- Employees
- Trustees
- Volunteers
- Members
- Customers
- Donors and supporters.

This information may include:

- Personal details
- Family details



- Lifestyle and social circumstances
- Membership details
- Goods and services
- Financial details
- Education and employment details
- Visual images, personal appearance and behaviour.

### Consent

Personal information is collected and processed by GBM in order to administer the individuals' membership and the activities of GBM. Some processing activities may also be carried out under a legal obligation (for example disclosing personal information to external parties under statutory powers), where it's necessary to protect the vital interests of the individual or another party (for example disclosures to external parties to ensure the safety and wellbeing of individuals), where it's necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example collecting or disclosing information in order to meet regulatory or statutory requirements such as DBS applications), or where it's necessary for legitimate interests pursued by GBM or a third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of the interests or rights of individuals). Where any of these legal bases don't apply, the consent of an individual to process their personal data will be sought.

We also process sensitive personal information and special category information that may include:

- Physical or mental health details
- Racial or ethnic origin
- Religious or other beliefs of a similar nature
- Offences and alleged offences
- Criminal proceedings, outcomes and sentences
- Trade union membership.

Personal information including sensitive/special category information is obtained directly from the individual, or in the case of children under 16 from their parents. Where this is collected and processed by GBM this will be on the legal basis of explicit consent of the individual or their parent, employment requirements, statutory purposes, the exercise or defence of a legal claim, purposes of medical or healthcare, or to process DBS applications or for safeguarding purposes. Any processing will be proportionate and relate to the provision of the services and activities of GBM. When information is used for monitoring and reporting purposes it will be anonymised.

Where information is collected from donors and supporters this will be on the legal basis of explicit consent of the individual. Any processing will be proportionate and relate to the purposes of fundraising or promotion of the purpose, objectives and activities of GBM.

Where consent has been given this will be recorded with the appropriate data. Volunteer and trustee information will be recorded on our leader database; volunteers and trustees have access to update and view the personal information held on this database.



## Managing consent

We have in place processes to regularly review consents to check that the relationship, the processing and the purposes haven't changed. We have in place processes to refresh consent at appropriate intervals, including parental consent.

Where the processing of personal information or sensitive personal/special category information is based on the consent of the individual, or parent where the person is under 16, they have the right to withdraw their consent at any time by contacting the local group leader or GBM's Data Protection Officer.

## Security and accuracy of information

GBM's staff and volunteer leaders will take steps to ensure the security and accuracy of personal and special category information.

- It's the responsibility of all staff, trustees and volunteers to ensure that information on individuals is kept safe and not left for others to see, this includes leaving paper-based forms and written information out or leaving personal data on your computer or laptop for others to view.
- Sensitive personal/special category information will only be shared where it is appropriate to do so for the safeguarding of individuals or for legal purposes.
- Paper-based forms will be kept secure in locked cupboard or filing cabinet.
- Personal information stored on a computer, laptop, mobile device, CD/DVD or USB will be kept secure either through encryption; password protection of the document; individual user login for the device such as username and password for an individual or PIN protection on mobile devices.
- Access to data stored on the GB leader database will be through role-based access, which only allows access to the data needed for your role. Access will be through username and password protection.
- It's recommended that strong passwords of at least eight characters, and including numbers, upper and lower case letters and characters e.g. % \$ are used.
- Sensitive or special category information held electronically will be held in a password protected document or database.
- The GBM Support Centre will operate a 'clear desk policy' and all personal information will be locked in drawers or cabinets overnight. Payment information will be shredded once input into the finance system.
- GBM Support Centre staff will verify personal information when a volunteer calls for information or advice.
- Member consent forms will be issued annually.
- Volunteer information will be reviewed annually as part of the annual census process and updated as new information is provided to the GBM Support Centre for example where new leader registrations are received or notification of volunteer leaders leaving or retiring.
- Team leaders should ensure that the GBM Support Centre is updated as soon as there is a change to a leader's information, for example leaving a group or retiring.
- GBM leaders are able to update their own information through the leader database and should ensure that their mail and email addresses are kept up to date.
- Information should be disposed of in line with the data retention schedules. Paper-based documentation or CD/DVD should be shredded.
- If a breach of information relating to an individual has occurred or is suspected this should be reported immediately to the GBM Data Protection Officer.
- If you create your own forms, ensure that you use the consent statement wording available to download for free from the GB leaders' online resource base.



**Individual rights**

Under the GDPR individuals have the following rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Where an individual wishes to exercise their rights in any of these areas they should contact GBM's Data Protection Officer.

**Retention periods**

We'll hold information in line with our data retention periods which are set out below:

TYPE OF DATA	GUIDELINE RETENTION PERIOD
<b>EMPLOYEE RECORDS</b>	
Accident reports	Three years after last entry or end of investigation if later
Staff personnel records	Six years after employment ceases
Details of references	Duration of employment
Wages, expenses and overtime records	Six years plus the current year
Records of unsuccessful applications, including references	Six months after notifying the unsuccessful candidate
Statutory maternity pay records	Six years after employment has ceased
Sickness records	Six years after employment has ceased
Payroll documentation	Six years after employment has ceased
Pension records	Three years after the end of the tax year for statutory sick pay purposes
Details of DBS checks	In accordance with DBS
<b>VOLUNTEER RECORDS (including trustees)</b>	Indefinitely for historical and statistical purposes unless removed at individual's request
Details of DBS checks	In accordance with DBS



<b>DONOR AND SUPPORTER RECORDS</b>	
Name and address details	Six years
Bank and credit card details	Until stop request received
TPS suppression request	Indefinitely
Email address	Three years
Gift aid declarations	Six years after the end of the accounting period they relate to
Consent for campaigns	Until campaign end date

<b>MEMBER RECORDS</b>	Indefinitely for historical and statistical purposes unless removed at individual's request
-----------------------	---

<b>SUPPLIER AND CONSULTANT RECORDS</b>	
Name and contact details	Six years after contract ends
Copies of contracts	Six years after expiry or termination of contract



## APPENDIX: FORMS AND PROCEDURES TO SUPPORT SAFE PRACTICE

The following forms and procedures, which support safe practice, are referred to in *Life to the Full*. These may be obtained directly from GBM's Support Centre, accessed for download via the GB leaders' online resource base or purchased from GB Trading.

<b>Title</b>	<b>Purpose</b>
<i>Volunteer Registration Form</i>	Registration process for those seeking to be adult volunteers in GB.
<i>Annual Consent Form</i>	To be completed annually by parents/carers giving contact/health/medical details and consent for photographs.
<i>Residential Events Health/Consent Form</i>	Used by those taking young people on a residential.
<i>Residential Events Registration Form</i>	To be completed at least six weeks prior to a Residential Event.
<i>Hazardous Activity Form</i>	Used to register all hazardous activities.
<i>Small bus permit application form</i>	Used by those taking young people on a journey.
<i>Sleepover Registration Form</i>	To be completed at least six weeks prior to a sleepover and includes sleepover guidelines.
<b>Guidelines and toolkits</b>	
<i>Residential Events Toolkit</i>	Free download from leaders' zone – includes model risk assessment.
<i>Delivering an Evening's Programme</i>	Available from GB Trading – includes good practice and model risk assessments. Risk assessment available to download for free
<b>Templates</b>	
<i>Responding to complaints template</i>	A useful template for you to complete if necessary
<i>Reporting concerns about a child/person's safety/welfare or they disclose abuse template</i>	A useful template for you to complete if necessary
<i>Character reference request template</i>	A useful template for you to complete if necessary





**girls' brigade ministries**  
lives transformed & enriched

Girls' Brigade Ministries,  
Cliff College, Calver, Hope Valley, Derbyshire, S32 3XG  
Tel: **01246 582322**  
Email: [gbco@gb-ministries.org](mailto:gbco@gb-ministries.org)  
Web: [www.gb-ministries.org](http://www.gb-ministries.org)

GB Ministries is the operating name of The Girls' Brigade England & Wales;  
a company limited by guarantee (No.206877)  
and a registered charity (No.206655).