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DOCUMENT STATUS AND VERSION CONTROL

Version	Date	Description	Author	Reviewers	Approval
2023 version issued and put online	23/11/2023		The Girls' Brigade	Senior Leadership Team	Superseded
0.3	26/11/2024	Restructure of document: About this doc, Starting a group and Whistleblowing policy added	The Girls' Brigade	Senior Leadership Team	Superseded
0.4	02/12/2024	Further restructuring, new EDI and gender inclusion guidance added	The Girls' Brigade	Senior Leadership Team	Superseded
0.7	14/12/2024	Results of Data Protection review	The Girls' Brigade	Senior Leadership Team	Superseded
0.93	30/1/2025	Results of H&S review included	The Girls' Brigade		
2025 v1 issued	30/1/2025		The Girls' Brigade	Trustees	Approved at board meeting on 28 January 2025.
Changes to be considered in future: - Consider whether the Minibus Driver Awareness Scheme (MiDAS) scheme should be implemented. - Checking driving licences regularly can be done easily and cheaply by third party companies for as little as £1.50 per check.					

1. ABOUT THIS DOCUMENT

'I have come that they may have life, and have it to the full!'
(John Ch.10:10. NIV)

1.1 Purpose

This document provides volunteers with the information you need to set up and run a Girls' Brigade group anywhere in England and Wales. It has been produced by The Girls' Brigade England & Wales (often referred to as "The Girls' Brigade" or "GB" below). It sets out the code of conduct we expect our volunteers to observe, the basic mechanics of running successful groups safely, and the policies that apply to all our work and activities.

1.2 Update and approval

The policies in this document will be reviewed and approved periodically and/or after an incident to ensure compliance with legislation and best practice. The broader expectations and guidance for GB volunteers will be updated every two years.

Volunteers will be informed of the changes through the View Online communication channel, and it will be announced at Conference (along with the Life to the Full (LTTF) training schedule). Training in Life to the Full is available each year and is recorded in the GB Manager database.

Note that some policies in this version of Life to the Full contain references to scripture at the start so that volunteers and staff understand the biblical context for the policy as well as the legislative basis for the policy. Over time, and as policies are updated, we will also include references to the bible too.

1.3 Structure

Section 2 introduces The Girls' Brigade structure and sets out our values, our Code of Conduct for Volunteers and outlines the requirements with which all The Girls' Brigade groups must comply.

Section 3 provides basic information about Girls' Brigade groups – how they run, and procedures and guidance for ensuring that activities are safe as well as fun.

Section 4 sets out our Safeguarding Policy.

Section 5 sets out our Safer Recruitment Policy.

Section 6 sets out our Equality, Diversity and Inclusion Policy.

Section 7 sets out gender inclusion guidance for groups and leaders.

Section 8 sets out our Data Protection Policy.

Section 9 sets out our Information Technology and Social Media Policy.

Section 10 sets out our Risk Assessment Policy.

Section 11 sets out our First Aid Policy

Section 12 sets out our Whistleblowing Policy.

Section 13 sets out our Anti-bullying and Harassment Policy

Section 14 sets out our Complaints Procedure.

Appendix A provides a list of forms and support documents to support you to run your group safely and successfully.

Appendix B provides information on understanding different types of abuse and how to recognise the signs of abuse.

Appendix C provides a glossary of LGBTQ+ terms, which may be helpful in reading the gender inclusion guidance in section 7.

1.4 Accessible format

Please note that this document is available on The Girls' Brigade website where you can pose questions to the "chatbot". You can ask the chatbot questions about the contents of the document, such as: what do I need to do if I'm planning a hazardous activity?", "how do I report a safeguarding concern?" or "how do I complete the census?".

2. ABOUT THE GIRLS' BRIGADE

2.1 Our structure

The Girls' Brigade England & Wales is a Christian charity that predominantly works with girls and young women. We recognise the value of a girls only space which provides a safe environment to explore the very particular issues facing girls. We also recognise the value of a boys only space and a mixed space. Our groups will gladly include boys in areas and churches where there is no provision for boys. This is called 'boys in trust'.

The Girls' Brigade is governed by a Board of Trustees. A number of trustee positions on the Board are ringfenced for young women who are under 30 years of age.

The Network Executive is a group of elected volunteers who have oversight of the uniformed youth work. The Network Executive reports to the Board. Each member of the Network Executive is attached to a number of districts and provides peer mentoring and support to leaders in those districts as appropriate. One particularly helpful way in which the Network Executive can support districts and groups is working together on the toolkits that help groups remain relevant, safe and sustainable. [See section 3](#) for more detail on these group and district toolkits.

The Chief Executive of The Girls' Brigade reports to the Chair of the Board. The GB Support Centre provides information, support and guidance to GB leaders, and works with district and group leaders to ensure that the organisation and our groups are safe places that are compliant with legislation and good practice.

Groups are the heart of The Girls' Brigade. Our network of volunteers across England and Wales run hundreds of groups offering thousands of young people the opportunity to experience a range of activities.

Our groups are primarily attached to churches, although groups can also be attached to faith-based schools and ecumenical partnerships. The relationship between The Girls' Brigade and the organisation to which they are attached is a partnership. There is a contractual relationship between GB and churches, schools and ecumenical partnerships to each fulfil specified duties and responsibilities. However, please note that GB groups are not 'owned' by the organisations to which we're attached – we retain our own responsibilities and obligations in relation to legislation, regulation and best practice.

Each group is attached to a District. Districts are comprised of GB group leaders who have been elected to administer the groups in their geographic area. District Officers typically include District Team Leader and District Treasurer. They play a crucial role in terms of facilitating communications between the GB Support Centre and the groups, providing peer support for groups, for local training, and for administering GB England & Wales local funds.

2.2 Our values

Our values shine through everything we do:

- *Fun!* In The Girls' Brigade we laugh a lot – there are smiles because we enjoy activities and feel at ease in our relationships.
- *Sound!* The Girls' Brigade is safe and secure. We take care in training and equipping leaders to operate responsibly in everything they do in GB. Safeguarding children and leaders and taking care to manage risk is important to GB.
- *Friendship!* Children, young people and leaders make friends through The Girls' Brigade. We have time to get to know one another, to care and support each other like friends do. GB friends often become life-long friends.
- *Discovering Jesus!* Through The Girls' Brigade, children, young people and their wider families discover the story of Jesus for themselves. They have opportunities and space to learn about Him and to become people who live like Him in this world.
- *Living it!* The Girls' Brigade enables children and young people to discover gifts, develop their potential, take up opportunities to develop leadership and life skills and to express their values and faith in the way they live.
- *Yes!* The Girls' Brigade is full of applause, encouragement, certificates, awards, smiles and simple “well dones”. The Girls' Brigade loves to affirm young people – to acknowledge their gifts, skills, achievements, and efforts, and to celebrate who they are.

2.3 Code of Conduct for Volunteers

The Girls' Brigade 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.

The Girls' Brigade recognises that volunteers, as responsible adults, are in a trusted position with the children, young people and families with whom they come into contact. It is the responsibility of all GB volunteers to ensure that their conduct does not fall below the standards set out in this code and to follow the policies, procedures and guidance issued by GB. They should ensure that they do not do anything that would breach their position of trust, including through online media or in person.

The Girls' Brigade's volunteers should:

- Always prioritise the welfare of children and young people
- 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 with) the children, young people and adults as appropriate
- Treat all members as individuals and with dignity and respect by engaging with one another in ways that welcome and accept, without judgment
- Respect and promote Equality, Diversity and Inclusion
- Encourage and equip each person to explore, identify and utilise their God-given gifts regardless of human condition, age, gender or circumstance
- Comply with all GB policies and procedures
- Pay particular regard to following diligently safeguarding policies and guidelines for safe practice as we must continually strive to keep everyone safe and free from abuse and neglect
- Ensure all concerns or allegations are reported in line with GB's policies as set out in this document
- Understand best practice in health and safety, and record risk assessments for all GB activities
- Know that bullying and harassment (as defined in the [Anti-bullying, Harassment and Sexual Harrassment Policy](#)) is not acceptable in any form
- Consider carefully the appropriateness of your discussions and activities given the age, gifts, talents and challenges of your members
- Never use inappropriate language or swear
- Deal with conflict in a calm and understanding manner and never act in anger
- Work openly and co-operatively with other church and Girls' Brigade volunteers
- Be honest, trustworthy, reliable and dependable
- Be accountable for their own behaviour and their relationships with children and young people, so that nothing should call into question their trusted position or their suitability to provide leadership within The Girls' Brigade
- Process any information received by them with utmost confidentiality
- Comply with the principles of data protection law
- Never ignore any inappropriate behaviour from children or adults
- Present a positive role model and set a good example both inside and outside The Girls' Brigade
- Regularly undertake relevant development and training to maintain and develop knowledge, skills and understanding, and

commit to reading GB's mailings sharing important updates and news.

The Girls' Brigade recognises that, as young people and young adults take up mentoring or leadership roles, they may have pre-existing relationships – whether family, friends or other relationships. All Leaders should report any existing relationships with a young person accessing GB's services as a member to their Team Leader prior to their appointment. Where the relationship is identified as a 'partnership', the Team Leader should inform the safeguarding lead at the Girls' Brigade Support Centre, who will record the information and will ensure that the new leader isn't in a position of direct control over their 'partner' and that they work in another section.

2.4 Compliance

To ensure that GB groups are safe, sustainable, and legally compliant, all GB volunteers must comply with policies and requirements as set out by the Support Centre and captured in this document. Compliance includes timely engagement in the census process and prompt payment of subscription fees.

If volunteers do not comply with GB requirements as set out in this document, then the Group's Team Leader will need to discuss this with you. If the non-compliance relates to a Team Leader, then Support Centre will need to discuss this with you.

If corrective action is not taken by volunteers to address the non-compliance within an appropriate timeframe, then they will be suspended by the Support Centre and the church will be informed. The Support Centre and church will ensure that the group can safely continue during this period through the assignment of an interim Leader or volunteer.

If, after these discussions and actions, the situation is still not resolved, then the Support Centre will take the appropriate action to resolve (including potentially revoking the volunteer arrangement with the people involved and appointing a new leadership team for the group).

3. RUNNING GROUPS

This section contains information on the responsibilities of a group leader in terms of compliance, administration and finance. It also contains guidance on ensuring that the activities of your group are safe as well as fun.

Toolkits have been developed which help both Districts and Groups ensure that they are working effectively and sustainably, and in line with the quality standards as set out in this document. The members of the Network Executive can help you work through these useful tools and provide peer support if you'd find that helpful. The wellbeing toolkits can be found [here](#).

Please also note that the Support Centre can help you advertise for and recruit new volunteers. Contact gbc@gb-ministries.org for more information.

3.1 Administration and records

3.1.1 Volunteers (leaders and helpers)

- Leaders must ensure that all volunteers are recruited safely (see the Safer Recruitment Policy) and have completed the relevant registration process. The forms must be submitted to the GB Support Centre within two weeks of the volunteer being appointed.
- Ensure that DBS checks for all volunteers are less than three years old. The GB Support Centre will send you automated reminders if they're overdue – please take prompt action.
- In line with our Safeguarding Policy, and ensure that your leaders have current safeguarding training (i.e. within the last 3 years). The GB Support Centre will send you automated reminders if this is overdue – please take prompt action.

3.1.2 Children and young people

- You must obtain a [GB Joining Form](#) detailing emergency contact details, and health and allergy concerns, for each child or young person. You must use this information populate their profile on the GB Manager database. The profile must be updated within 4 weeks of you receiving new or updated information.
- Parents must be asked to check this information twice a year. The Joining Form can be shredded once the GB Manager database is updated.

- You must keep an accurate register of attendance to ensure you record members present. The register function that's contained in GB Manager is the strongly recommended way of doing this because the system is secure and compliant with legislation. If you collect this information on paper, you will need to ensure that you're compliant with Data Protection legislation.

3.1.3 Health & safety

- You must ensure that any incidents, accidents, complaints, or grievances are recorded, dated and reported to the team leader or other appropriate person.
- For all activities, the relevant risk assessment, using the [Delivering an Evening's Programme Toolkit](#), should be recorded, actioned, and filed.
- If you plan a high-risk activity, you must complete the relevant [Hazardous Activity Form](#) and return it to the GB Support Centre prior to the event, to ensure the required insurance cover is in place.

3.1.4 Census process and subscriptions

You must respond promptly to the annual Census requirement so that The Girls' Brigade can plan and support you based on accurate information. Subscriptions must be paid.

3.1.4.1 Census timeline

- *March:* Emails are sent to groups regarding census submission and payment. This will include details of how submissions should be made via GB Manager.
- *April:* From 1st April census is live and submissions and payments can be made
- *30th April:* Deadline for submissions and payment of fees. Where payments aren't received by the deadline, other activities can't proceed, including residentials. The trading account of the group will also be put on hold.
- Following the deadline, reminders will be issued to Team Leaders if submission and/or paid census returns aren't completed.
- If submission/payment is still not received, a second reminder will be issued to Team Leaders, including the Church Minister the the correspondence, and an email will be sent to District Team Leaders to detail those groups that haven't submitted and/or paid in their area.
- *If submission/payment is still not received,* a third and final reminder will be issued to Team Leaders, Church Ministers and District

Team Leaders. Communication will highlight breach of the franchise agreement and the prospect of suspension of leaders. Please refer to [section 2.4](#) of this document about compliance.

3.2 Financial compliance - maintaining financial records

- You must ensure that all monies collected are counted, recorded, and receipted as appropriate and the money kept securely.
- You must keep accounts, and anything which includes a financial transaction, for seven years. You must ensure that registers are kept indefinitely. Insurance claims may be made up to a child's 18th birthday, and the register may be necessary to prove who was at your group on any given day.
- You must ensure that consent forms are kept somewhere secure: if they are lost we could be sued for a breach of data protection – [see section 8](#) for our Data Protection Policy.
- Each group should determine a realistic weekly/termly subscription for its members.
- All money that comes into the group must be recorded e.g. subs, tuck and uniform/kit.
- All expenses must be claimed with a signed receipt to give a clear picture of running costs.
- Money must be checked and recorded weekly and paid into the bank regularly.
- A bank account for your GB group can be the church bank account or a specific account for your GB group but must not be a personal account.
- Bank accounts and cheque books used for GB must require two signatures for all instructions.
- GB group accounts must be presented to the church authorities for checking/audit each year. Any suitable person, who isn't attached to the GB group, may undertake the check
- When planning events, you should budget carefully to ensure that costs are covered as far as possible.
- Consider and take advantage of opportunities for the group to fundraise. Be creative!
- Each registered group can order supplies from GB Trading.

3.2.1 District Consolidations

The District Consolidation process collates all year end District finances together and combine these with the year end Girls' Brigade England and Wales accounts.

Prior to the end of the Financial Year, (31 December) an email will be sent from the GB Support Centre to District Treasurers and

District Team Leaders to request District Returns are completed. The deadline for completion and return of the Consolidation form is 31 January.

Any problems encountered with the completion of the form should be raised with the GB Support Centre as soon as possible to ensure the completion deadline is met.

3.3 Planning and running safe activities

Beyond the basics required to ensure compliance, the week-to-week purpose of a group is to organise activities for its members. The Delivering an Evening's Programme Toolkit contains information to help you plan and deliver activities safely.

The Girls' Brigade's activities are many and varied, taking place in a range of contexts. We can look at activities under the following headings:

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

When planning activities at a local, district or national level in any of these contexts, ensure safe practice by giving due attention to each of the following areas:

- Supervision levels
- Roles and responsibilities
- Health and safety aspects.

The following guidelines will help you with this. Wherever reference is made to a risk assessment, the policy set out in [section 10](#), must be followed.

3.4 Supervision levels

3.4.1 On-site activities

- There should always be a minimum of two trained volunteers on site, and whenever possible at least three over 18s should be

present.

- Remember that a global ratio for supervision can't be determined: supervision levels should be determined by considering:
 - o the number, age, circumstances and status of members present
 - o the layout of the building and nature of activity being undertaken
 - o guidance given by the church where the group meets regarding recommended minimum adult to child ratios
 - o Also, ensure that a single adult is never left working with a lone child.
- Whenever possible there is more than one leader with a group. Never leave children or young people unattended.
- 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.
- Risk assessments must be completed.
- If the premises you use are shared with other users/organisations, ensure you have enough leaders to manage this and that it's reflected in your risk assessment.
- All incidents and/or near misses are recorded and investigated with additional controls being put in place going forward if necessary. Risk assessments should also be reviewed and updated following an incident.

3.4.2 Off-site activities

- Risk assessment must be completed.
- All incidents and/or near misses are recorded and investigated with additional controls being put in place going forward if necessary. Risk assessments should also be reviewed and updated following an incident.
- Assign groups of children and young people to specific leaders for the duration of the visit/event. Ensure you have enough volunteers to manage this.
- Ensure you have:
 - o a system for regular head counts throughout the day
 - o a procedure in place in case a child does go missing.
- If a child or young person is lost on an outing:
 - o the leader noticing the child missing should alert other members of the party and carry out a numbers check
 - o a leader, or the whole group if appropriate, should retrace their movements to the last place that the child was seen

- o another leader should alert the management of the organisation being visited to let them know the situation
- o children on the visit should be asked for any relevant information if appropriate
- o a system for regular head counts throughout the day
- o if the child is not found straight away the GB group will alert the parents.
- o if the child is not found after 15 minutes the police will be called.
- o after the event is resolved, please call the GB Support Centre, who will call your LADO and your church safeguarding lead, to update them on the situation.
- Wherever appropriate, comply with the transport guidance set out in [section 3.6.4](#).

3.4.3 Residential Events

- Observe the minimum supervision levels for Residential Events detailed in the [Residential Events Toolkit](#): a minimum of three leaders (two of whom should be female) are required for any Residential Event.
- Risk assessment must be completed.

3.4.4 Additional guidelines

Boys in trust

Where there are boys under the age of 8, it's strongly recommended that both male and female leaders are present.

Under-8s: Sleepovers and Residential Events

Under 8s may attend a one-night sleepover providing it is at a venue local to your group's base. Members must be aged 8 or over to attend a residential event.

For sleepovers, leaders' children aged under 4 must have one-on-one supervision and therefore their carer cannot be taken into the ratio of adults attending. For residential events, leaders' children aged under 8 must have one-on-one supervision and therefore their carer cannot be taken into the ratio of adults attending. This carer may be the parent or could be another designated adult.

3.5 Roles and responsibilities

3.5.1 On-site activities

- The person in charge must be clearly identified to all participants.
- All volunteers must have a clear understanding of their roles and responsibilities.
- Leaders are responsible for planning, facilitating and delivering an age-appropriate programme to their group.
- A named first aider(s) must be identified, and a first aid kit should be to hand. The named first aider(s) must be trained to the minimum training standard in The Girls' Brigade First Aid Policy ([see section 11](#)).
- Volunteers must understand The Girls' Brigade Safeguarding Policy and the process for referral if a concern or allegation is raised (see [section 4.16](#), Flowchart for procedure when concerns are raised about a child/person's safety or welfare or they disclose abuse).
- 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).

3.5.2 Off-site activities

- Clear statements must be prepared to ensure people know who is responsible for the children and young people at each stage of the activity.
- The event organiser must prepare/agree a list of volunteers with their defined responsibilities and distribute this to all relevant personnel prior to the event.
- A named first aider(s) must be identified, and a first aid kit should be to hand. The named first aider(s) must be trained to the minimum training standard in The Girls' Brigade First Aid Policy ([see section 11](#)).

3.5.3 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.
- A named first aider(s) must be identified, and a first aid kit should be to hand. The named first aider(s) must be trained to the minimum training standard in The Girls' Brigade First Aid Policy ([see section 11](#)).

3.6 Health and safety aspects

3.6.1 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 do not pose a trip or safety hazard.
- 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/emotional safety as detailed in the [Delivering an Evening's Programme Toolkit](#).

3.6.2 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](#).
- A [Hazardous Activity Form](#), should be completed if necessary; please note one form with several events during a calendar year can be submitted.
- 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 retention periods in [section 8.22](#).

- A health & safety talk must be given at the start of the event which must also include details of fire drill and evacuation procedures
- Ensure that emergency contact information for each member of the group, including a parent/carers contact number for the day, are available at the event and on any day trips. This should normally be achieved through online access to member records in GB Manager to ensure confidentiality and data protection, but carefully controlled paper records must be used in settings where there is no wifi or poor internet connection. Clear guidelines for behavioural expectations and rules of conduct for the event should be explained to all attending.
- All participants should sign in/out to ensure a record of those on site is readily available.
- If you wish to go swimming at the beach, a swimming pool or lake, there must be a qualified/certificated lifeguard present (or a GB leader with a current lifeguarding qualification). However, children may paddle as long as the water depth is below that of their own knees.
- Any specialised equipment must be checked for safety (such as 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
- Fluorescent bibs are mandatory for taking members under 14 out at night. Reflective jackets are useful if travelling at night
- Wherever appropriate, comply with the transport guidance set out in [section 3.6.4](#).

Guidance for trampoline parks

If you wish to go to a trampoline park or use a bouncy castle, you need to send GB Support Centre the details and a completed [Hazardous Activity Form](#), so we can look at the park's insurance waiver before giving permission or not. Bouncy castles are a notorious problem when it comes to insurance.

3.6.3 Residential Events

- Appropriate risk assessments should be completed using the [Residential Events Toolkit](#), and the event should be registered with the GB Support Centre using the Residential Events Registration Form
- Leaders should register the event with the GB 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
- A [Hazardous Activity Form](#), should be completed if necessary
- A Residential Event meeting with parents/carers must be held to inform them of arrangements

- 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 in [section 8](#).
- 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. You must ensure that the external fire risk assessment covers having sleepers on the premises used for the sleepover. It would not be standard for a church hall to cover this for example. Third party premises designed for overnight parties should already take this into account, but you should check as part of your due diligence when choosing a place for residential events. The [Sleepover Registration Form](#) must be completed as must a risk assessment form.
- The Girls' Brigade 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.
- Building/location safety:
 - o Check the building/site is secured at night.
 - o Keep the key in an identified place to ensure access if needed.
 - o Inform the police and fire brigade of the dates you're occupying the site.
 - o At night ensure stairs and passages are lit.
 - o Challenge anyone on site who is not part of your group.
 - o Ensure all members of your group carry a card with emergency contact details.
 - o Relevant fire precautions, fire buckets etc. must be in place on an outdoor camp site.
- Accommodation considerations:
 - o Over 18s and under 18s shouldn't sleep in the same room.
 - o Male and female sleeping, washing and toilet facilities should be separate.
 - o Careful preparation and discussion should take place to enable the participation of transgender and non- binary children and young people in residential activities, including with the young person and their family. Where possible, transgender children and young people should be able to use the sleeping, washing and toilet facilities for the gender they identify with. However, some transgender children and young people may not feel comfortable doing this and so alternative arrangements should be made. Further guidance on supporting transgender and non-binary young people can be provided by the GB Support Centre.
- Health aspects:
 - o Take first aid and health consent forms with you when you go out.
 - o Identify a qualified first aider and ensure everyone knows who this is.

- o Put all medication into your medical box and keep it locked.
- o Record all accidents and administration of medicines in your first aid record book.
- o Make all leaders aware of any potential health problems e.g. asthma/epilepsy/allergies.
- o Inform parents/carers of any patent medicines that may be offered to the young people.
- o Wherever appropriate, comply with the transport guidance set out in section 3.6.4.

3.6.4 Guidelines for transport to/from off-site activities or events

General

- Give due care to boarding and dismounting vehicles.
- Volunteers should sit next to exits on trains, buses etc.
- 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.
- Current regulations regarding the use of seat belts, booster cushions and other safety restraints must be adhered to.

Driving - general:

- The driver should be accompanied by an additional adult for supervision. 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.
- Drivers should be given clear written instructions about their responsibilities covering all aspects of vehicle operation. They should also make sure they're familiar with the vehicle and practise driving it, before carrying any passengers.
- Drivers must not use a mobile telephone whilst driving.
All drivers should be aware of the risks to passenger safety which can result from driving when tired. It's not sensible to set off on a long trip after a full day's work, whether that work involves driving or not. You should plan more rest breaks than are set out in the regulations, if you don't drive for a living. Aim to have a 15 minute break from driving every 2 hours. If possible, share the driving.
- It's best practice to have more than one minibus driver, for example in case one of them gets sick and has to return home or is injured and unable to drive the minibus.

Driving – private cars

- 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.

Driving a minibus

- A minibus permit, issued by The Girls' Brigade, must be displayed in the vehicle to show that there is insurance covering the people on the bus.
- Before driving a minibus, drivers should:
 - o check the roadworthiness of the bus
 - o complete any relevant minibus training.
- Minibus drivers who passed their car driving test before 1 January 1997 will normally have a D1 with a 101 code – minibus, not for hire or reward – entitlement on their licence. Even though the licence code stands for 'not for hire or reward' these licence holders can drive a minibus operated under a minibus permit without additional conditions.
- Drivers who passed their driving test from 1 January 1997 were not granted the D1 101 entitlement on their licence and will only have a B entitlement. If a driver with only a category B entitlement can comply with all of the following conditions they may drive, on behalf of a non-commercial body for social purposes but not for hire or reward, a 9 to 16 seater bus if:
 - o They have held a full category B car licence for at least 2 years
 - o They receive no payment or other consideration for driving other than out-of-pocket expenses
 - o The vehicle has a maximum gross weight not exceeding 3.5 tonnes (4.25 tonnes including specialised equipment for the carriage of disabled passengers)
 - o For drivers aged 70 or over, that they don't have any medical conditions which would disqualify them from eligibility for a D1 licence
 - o No trailer is being towed
 - o Where the driver's licence only authorises the driving of vehicles with automatic transmission, that only a vehicle with automatic transmission is used.

3.7 Leaders' and members' children or children in their care attending GB local group sessions and activities

3.7.1 Policy

The Girls' Brigade policy is that children need to be aged four or above to be a member of GB and to attend local group sessions and wear uniform.

However, The Girls' Brigade recognises that, from time to time, leaders or members may need to take their own children, or children who are in their care e.g. grandchildren or children in foster care, who are not GB members, to a local group session either because of a temporary breakdown in childcare or return by a leader or member to the group following a maternity break.

This should be seen as a temporary measure and not a permanent position within the group. The Girls' Brigade have set out the guidelines below to help groups to support leaders and members in these specific circumstances.

3.7.2 Guidelines

Local groups should ensure:

- Where the child is of the age to be in GB, i.e. aged four or over, the guidelines and procedures in Life to the Full are to be followed
- They record any attendance for leaders' children in their attendance register
- There is adequate supervision and staff numbers to reflect the age and number of children
- Note should be taken of the guidance given by the church where the group meets regarding recommended minimum adult to child ratios
- Where the child is under four additional guidance is to be followed:
 - o That a full risk assessment is in place and that a copy of the risk assessment is provided to the GB Support Centre for insurance purposes
 - o That the child is looked after by a separate adult when the leader has responsibilities with the GB members
 - o That there are suitable baby changing/crèche facilities for young children
 - o An area for under fours is provided and is segregated away from the other children/activities
 - o Where a more permanent measure is required a fully risk assessed plan should be put in place and a copy of the plan provided to the GB Support Centre.

- Separate guidelines are provided for attendance at Residential Events and can be found within the [Residential Event Toolkit](#).

3.8 Starting a group

The below points explain the steps of how to set up a local community group with Girls' Brigade:

3.8.1 Contact us

Contact the GB Support Centre to organise a phone call or meeting about how we can support you.

3.8.2 Recruit a volunteer leadership team

You'll need a minimum of 2 adults, aged 18 plus, working with any group of children and young people, two of whom must have completed The Girls' Brigade training and registration process.

3.8.3 DBS check

Each volunteer is required to have an enhanced disclosure for working with children. This is easily done online at no charge.

3.8.4 Training

At least two volunteer leaders will need to complete our GB's 18+ training programme. The training has been designed to reflect some of the key foundational elements in mission among children and young people and running a GB group. Training can be delivered in a day or over 2 or 3 evenings. One volunteer leader will also need to complete an additional team leader module in order to oversee the group.

3.8.5 Approach your church, school or local ecumenical partnership

We require a franchise agreement and mission relationship document to be signed by both you and the church to set up a group.

Discuss with your minister the age groups you want to work with.

Decide when and where your group might meet.

3.8.6 Confirm franchise details with GB

You'll need a franchise agreement to formalise the working agreement with GB. To send you the paperwork, we need the following information:

- The specific age groups that you'll be serving
- The day and time the group plan to meet
- The name of the person who will take up the role of team leader
- The name and address of the church which the group belongs to
- The name and address, phone number and email address of the minister.

Please email these details to us and we'll send you the franchise agreement.

3.8.7 Complete forms

After the training and DBS checks have been successfully completed and returned to GB, you'll need to complete the following forms:

- Volunteer registration form: This is required for those who have trained to be a volunteer leader and we'll send it to you once your group set-up is underway.
- Mission relationship and registration: This outlines our commitment to working together.
- Franchise agreement: This formalises the working agreement with GB. Please complete two copies of this – we'll then sign them and return one for your records.

3.8.8 Approval

Following successful approval by The Girls' Brigade, we'll send you written confirmation and an insurance certificate, showing that you can officially meet under the umbrella of The Girls' Brigade and its insurance.

3.9 Closing a group

If your group is under threat or is unsustainable for whatever reason, contact the GB Support Centre at the earliest opportunity. Also consider contacting the Network Executive member linked to your group or district – they might be able to help.

Groups can close for a variety of reasons, and we know it's a difficult decision to make, and one which must be taken in conjunction with the GB Support Centre, your church or school or ecumenical partnership.

- All volunteer leaders of the group, a district representative and a member of the GB Support Centre need to discuss the situation fully with the church governing body and reach a decision that it is not possible or appropriate for the group to continue.
- Ensure that the church informs the Support Centre
- Ensure that you have given the necessary information to the Support Centre so that GB Manager is updated accordingly
- Give the members and parents adequate notice, at least a minimum of four weeks, so they have time to get used to the idea and do not feel abandoned. Explain the reasons, with representatives of the group and the church both present.
- Inform the members where their nearest group meets.
- Check that all debts are paid (including subscriptions to the GB Support Centre) and all obligations cleared.
- Contact the Support Centre to discuss and agree how to deal with the cash, equipment and other assets of the group in a way that's compliant with legislation, regulation, and contract. If specific items have been donated the wishes of the donor should be ascertained wherever possible.
- Once the final decision about closure has been made, put this in writing to the GB Support Centre.
- Records about the group should be kept securely in line with GB policies and retention schedules as set out in the Data Protection Policy in [section 8](#).
- Consent forms or registers should be given to the church for safekeeping and retained in line with the church data protection policy.

3.9.1 Closing a district

- If you have any concerns about the running or viability of your district, please contact the Support Centre for advice.
- If we believe that your district is not functioning efficiently, then we will explore with the district team, the possibilities around merging or closing your district.

- To ensure compliance with Charity Law, those districts that are closing must close associated bank accounts. As the district is a part of the National Charity - Girls' Brigade England & Wales - the remaining funds from any associated accounts should be transferred to the Girls Brigade England and Wales account.
- Final balance statements should be sent to the support centre for their records.

4. SAFEGUARDING POLICY

4.1 Introduction

The Girls' Brigade (GB) aims to create a safe, supportive, and welcoming environment for predominantly girls and young women aged 4-18, as well as for those aged 18-25 in leadership roles. As an inter-denominational Christian organisation, we work with a diverse range of churches, each with different theological views.

We acknowledge our duty of care to our members and volunteers and the importance of safeguarding the welfare of the children, young people and adults with whom we work. Our safeguarding duty applies to the children and young people with whom we work in addition to our adult volunteers.

4.2 Purpose

This safeguarding policy and associated guidance is designed to help GB leaders with practical knowledge and skills to foster safer environments that are free from abuse and neglect. It links biblical teachings with legal obligations and best practices, providing actionable steps for leaders.

Background information and guidance can be found in [Appendix B: Understanding and awareness of potential abuse](#).

4.3 Why Safeguarding Matters

Keeping people safe from abuse and neglect is an integral part of our mission and ministry as Christians.

The Girls' Brigade also recognises that our leaders and helpers are in positions of trust and have authority over the children and young people they work with. We all have a responsibility to ensure this power isn't abused.

4.4 Core Values and Principles

The Girls' Brigade is built on values of Fun! Sound! Friendship! Living it! Yes! and Discovering Jesus! Our approach is rooted in:

- *Person-Centred leadership*: Treating each person as an individual, acknowledging their unique experiences and needs.
- *Biblical compassion and justice*: GB upholds the biblical principles of the Yes! In the bible we see that Jesus seeks out and prioritises those who are vulnerable, marginalised, and facing injustice.
- *Legal compliance and best practice*: Understanding and complying with legal requirements is crucial for providing a safe and equitable environment.

4.5 Reflecting on Biblical Teachings

Many organisations and denominations have a theology of safeguarding. The following passages can also help guide your approach:

- *Micah 6:8*: Calls us to “act justly, love mercy, and walk humbly with our God,” encouraging leaders to act with kindness and fairness.
- *Matthew 25:40*: “Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me.” This verse underlines the importance of serving and supporting everyone, especially those who may feel marginalised.

4.6 Safeguarding Policy

Our policy is to:

- Work in partnership with local churches in the appointment of appropriate people to volunteer and leader roles using safer recruitment processes
- Follow safer recruitment policies for paid staff appointments
- Provide relevant information and training for staff and volunteers
- Use safer recruitment processes for the registration of volunteers
- Handle personal information carefully and sensitively in line with our data protection and confidentiality policies.
- Operate within clearly defined safeguarding procedures for volunteers and paid staff that are consistent with legislation and best practice
- Ensure all paid staff and volunteers receive relevant support and supervision
- Designate specified people from the staff team to provide advice and guidance on safeguarding
- Designate specified leads from the Network Executive and Trustee Board to have oversight of safeguarding and scrutinise key performance indicators.

4.7 Compliance with safeguarding policy

The Girls' Brigade requires all groups to keep up to date and accurate records of safe recruitment and training for all volunteers. We expect the groups to keep accurate registers of all the members and volunteers attending each session.

The lead trustee for safeguarding, with the staff team, will arrange for regular audits of practice to monitor compliance and identify any areas for improvement.

The Board will also review KPIs including DBS checks that are older than 4 years and safeguarding training stats. They will also review safeguarding incident reports to determine if the correct procedures have been followed.

As required, the board will arrange for a local or organisational learning review if it is believed that policy and procedures have not been followed, or there is a perceived policy gap.

4.8 Safeguarding procedures

- All GB's 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 The Girls' Brigade's appointment policy for volunteers. Young people can remain in the n:spire section until the age of 25 but require DBS checks once they're Advanced Young Leaders (16+) or adults (18+).
- All contact with children and young people should be supervised until the required DBS clearance has been obtained.
- GB teams and the church should ensure that all GB volunteers have access to a designated independent person with whom they can discuss concerns and from whom they can seek advice.
- Regular Girls' Brigade team meetings should be held, which will provide opportunities, not only for planning, but also for discussing any areas of concern. Safeguarding should always be a standing agenda item, and any issues or concerns properly recorded.
- Remember GB groups legally belong to the church to whom they are attached and so should follow their church's safeguarding procedures accordingly. The Girls' Brigade have developed an agreement that clarifies the mutual responsibilities of both parties. This is available on the website for local use.
- GB volunteers will undertake safeguarding training as part of their appointment process and should refresh this training

at least every four years with safeguarding refresher training provided by the church, The Girls' Brigade or a relevant professional body. Compliance with this requirement will be monitored by the GB Support Team.

Taking of photographs and videos must follow the requirements set out in the IT and Social Media policy in [section 9](#).

- All sleepovers should adhere to The Girls' Brigade'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.
- GB volunteers and staff members should ensure that they set appropriate boundaries in their relationship and not engage in friendships, romantic or sexual relationships with children and young people under 18 years of age.
- Young leaders and new leaders aged 18 or over should ensure that they declare new or existing relationships with GB members who are under 18 or over 18 and accessing GB's services as a member, in line with our declaration of relationships guidance.

Volunteers and staff should always:

- Seek to promote the Christian faith through their role in The Girls' Brigade 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. Both must have completed GB training and be registered with the GB Support Centre. This could be two leaders, or one leader and an assistant leader, but not two assistant leaders/helpers. Helpers (who are over 18 with current DBS and safeguarding trained) can count as the second adult.
- Respect the privacy of children and young people in changing rooms
- Ensure that a GB leader is always present when children and young people are working with external visitors
- Ensure that children are collected by an adult authorised by the carer/parent
- Ensure that young people have permission from parents/carers to go to/leave GB activities on their own, if appropriate
- Ensure that any joint activities have both male and female supervision
- Promote practice that is anti-discriminatory and anti-bullying and harassment
- 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 team.

Volunteers and staff 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

- 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
- Drink alcohol when they're directly responsible for children and young people and never allow young people on GB activities to drink alcohol.

The Girls' Brigade expects staff and volunteers to carry out their role:

- In line with the guidelines established by the denomination of the churches with whom they are partnering in mission
- In accordance with the guidelines established by The Girls' Brigade
- In an understanding manner and working in partnership with parents/carers
- In cooperation 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.

If there are any areas in your personal life that might affect your role in The Girls' Brigade, such as an allegation made against you or someone you live with, please talk to your team leader/church safeguarding lead and the GB Support Centre.

4.9 Data protection

- In conjunction with UK General Data Protection Regulation and Data Protection Act (2018), GB volunteers and staff members must comply with data protection laws while dealing with safeguarding procedures
- The purpose of this section is to ensure that where personal data is processed for the purposes of safeguarding that appropriate measures are taken to provide for our lawful obligations including but not limited to the use of the lawful bases. It is likely in such circumstances that special arrangements will be required and therefore this section is also complemented by the Appropriate Policy Document (APD)
- Data protection is not a barrier to sharing concerns about a child or an individual at risk. Always be open and honest about what you will do with the information.
- You should make a note in the safeguarding report of any express wish not to share the information but not let this prevent you

from sharing.

- If you have any concerns about information sharing, contact the 31:8 Helpline for advice.
- The reliance on 'consent' as a lawful basis for processing information, under Article 6 of the UK GDPR, is not always appropriate for the following reasons:
 - o consent to the processing cannot be given by the data subject
 - o the controller cannot reasonably be expected to obtain the consent of the data subject to the processing
 - o the processing must be carried out without the consent of the data subject because obtaining the consent of the data subject would prejudice the provision of the protection mentioned (safeguarding if children and individual at risk; safeguarding of economic well-being of certain individuals)
- In the circumstances mentioned above, in order to comply with our duty of care and safeguarding, The Girls' Brigade would process information raising safeguarding concerns and share them with relevant authorities when required, under the following lawful basis:
- Where an individual's life may be at risk we may process the data according to the UK GDPR Article 6(d) and GDPR Article 9(c) where such processing is vital to the individual's life, and/or Article 10 UK GDPR supported by DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of children and of individuals at risk and/or paragraph 19 Safeguarding of economic well-being of certain individuals
- Where an individual or child is at risk – UK GDPR Article 6(f) legitimate interest, Article 9(g), substantial public interest, Article 10 UK GDPR, supported by DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of children and of individuals at risk
- Where an individual is at economic risk – UK GDPR Article 6(f) legitimate interest, Article 9(g) substantial public interest, Article 10 UK GDPR, supported by DPA 2018 Schedule 1, Part 2 paragraph 19 Safeguarding of economic well-being of certain individuals
- When the above conditions are relied upon, an Appropriate Policy Document is required.

Data subjects' rights and other UK GDPR provisions may be restricted when concerning personal data processed in the circumstances described above. Restrictions on the data subjects' rights may be permitted by the exceptions included in the articles of the individual rights (UK GDPR) or by one of the exemptions included between Schedule 2 and 4 of the DPA 2018. Examples of exemptions that might apply in the circumstances of safeguarding are the following:

- Schedule 2, Part 1, paragraph 2 (crime and taxation)
- Schedule 2, Part 3 (right of others)
- Schedule 3, Part 5 (child abuse data).

Exceptions and exemptions are applied on a case-by-case basis.

Records of such processing must be kept to account for the action taken. The principles of the UK GDPR must be observed at all times.

4.10 Dealing with disclosures or allegations

Responding to the person...

Do:

- Listen carefully to the person who alleges that abuse has taken place
- 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, without asking leading questions
- 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 The Girls' Brigade procedure for reporting abuse
- Seek advice from designated/appropriate people especially where there is a concern about the person's immediate safety.

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.

4.11 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 GB procedures below.

Low-level concerns, such as someone being over-friendly to children, having favourites, etc, which don't meet an allegation threshold or aren't serious enough for reporting to a Local Authority Designated Officer (LADO), should also be noted and shared in the appropriate manner.

See also [section 4.16](#), Flowchart for procedure when concerns are raised about a child/person's safety or welfare or they disclose abuse, which shows what action should be taken.

You must:

- Inform the team leader/GB leader in charge
- Consult with the church and/or The Girls' Brigade safeguarding designated person and agree a course of action in line with the joint agreement about mutual responsibility
- The Girls' Brigade's designated safeguarding lead is the CEO, and the deputy safeguarding lead is the Operations Manager
- If advised by church/The Girls' Brigade safeguarding designated lead, inform parents/carers of the concerns
- Tell the GB Support Centre about the concern for its records
- If agreed, in consultation with the designated person, LADO, Children or Adult Social Care 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 website
- Offer support to the volunteer making the report.

If the allegation of abuse is against a Girls' Brigade volunteer, follow these guidelines in conjunction with the Guidelines and procedures for dealing with complaints. Note specifically 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.

Allegations, even false ones, will be kept on GB's file for 10 years.

4.12 Pastoral support

Pastoral support can be sought from your local church or from the Girls' Brigade National Chaplain. Contact gbc@gb-ministries.org who will arrange to put you in contact with the National Chaplain.

4.13 Legal and Policy Framework

Adhering to current legislation and statutory guidance is crucial including Working Together to Safeguard Children 2023, and the Care Act 2014 (which is concerned with safeguarding adults with care and support needs).

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.

Refer also to the GB policies on safer recruitment ([section 5](#)), data protection ([section 8](#)), IT and social media ([section 9](#)), and risk assessment ([section 10](#)).

4.14 Additional Resources

See [Appendix B](#) for information on understanding what constitutes abuse and the signs of abuse. See also the [31:8 website](#).

4.15 Key Contact Details

Contact the Safeguarding Officer at your local church or the GB Support Centre if you need advice or guidance. The Designated Safeguarding Lead and the Deputy can be contacted on be-safe@gb-ministries.org or on 01246 582322.

In an emergency, especially if someone is in immediate danger of harm, you should always call 999 straight away and ask for the police.

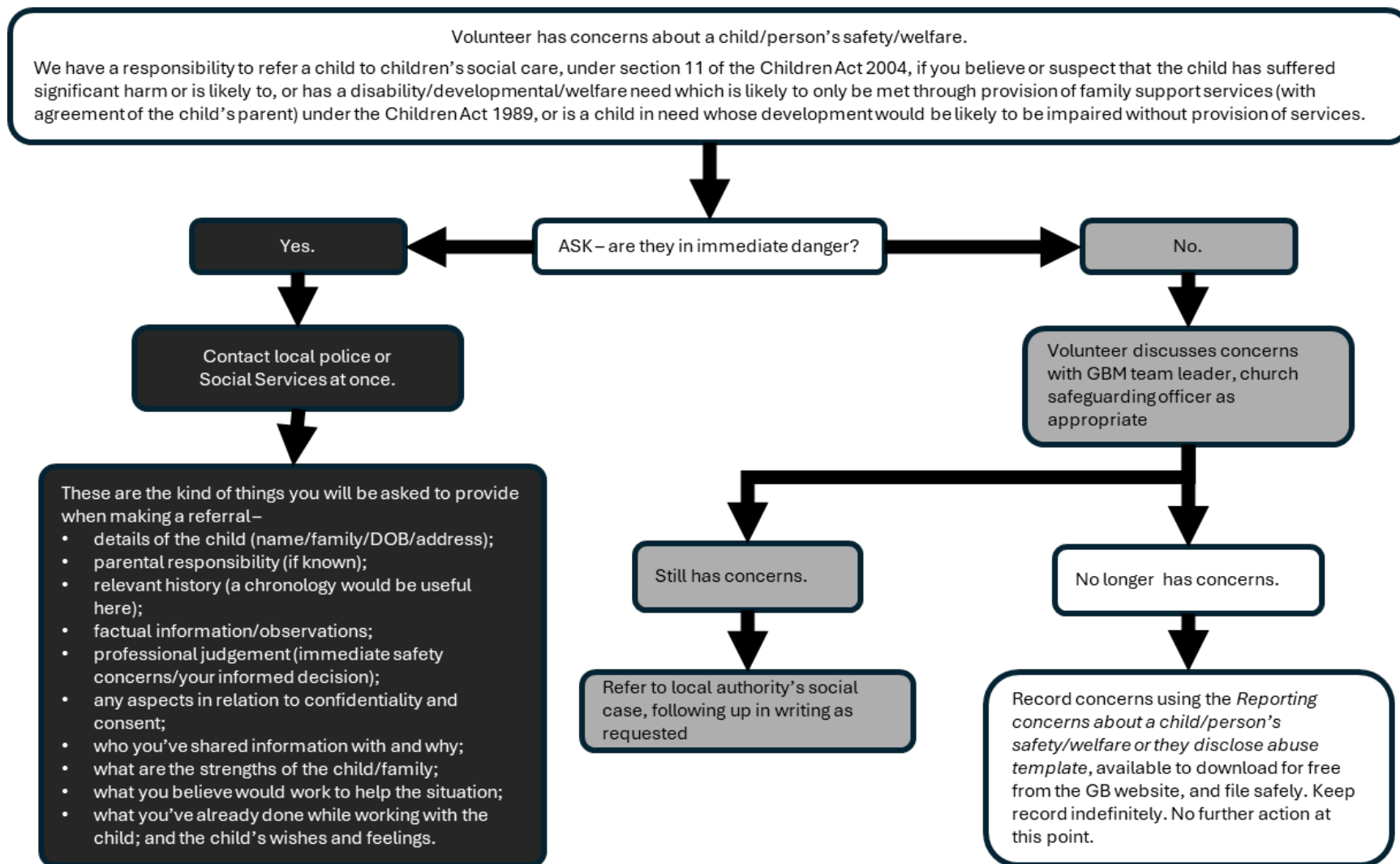
4.16 Flowchart for procedure when concerns are raised about a child/person's safety or welfare or they disclose abuse

Support should be offered to the GB volunteer making the report.

If the allegation of abuse is against a GB 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.

If an allegation is made to the local police, then you must also call the LADO within 1 day of the allegation.

4.16 Flowchart for procedure when concerns are raised about a child/person's safety or welfare or they disclose abuse



5. SAFER RECRUITMENT POLICY

5.1 Policy statement

Within The Girls' Brigade there are many 'workers' – some are staff employed by the charity, but most are volunteers working within local settings. In all cases The Girls' Brigade 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.

5.2 Procedure for the appointment of volunteers

Before starting the appointment process, local groups must ensure that published details of the opportunity to join the local team contains a reference to the safe recruitment process and the need for a DBS check.

In The Girls' Brigade, 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 GB team should:

- Agree their involvement in The Girls' Brigade with the church of which the GB team is a part, as the church needs to approve the appointment and ensure relevant references are obtained using the [character reference request template](#) and ensure that the new volunteer completes a [self-declaration form](#).
- Be equipped for their role using the **n:fluence 18+** training material. This training will need to be arranged and delivered by the appropriately trained people e.g. the district team leader and/or designated trainer(s)
- Apply for, and obtain, an enhanced DBS check through the church or The Girls' Brigade. You can check the privacy policy for enhanced DBS checks at <https://www.gov.uk/government/publications/dbs-privacy-policies>
- Complete a [self-declaration form](#) annually and return to the GB Support Centre where it will be uploaded onto GB Manager
- If possible, work in the local group under the supervision of registered and trained GB 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 GB group or an alternative youth/children's work within a church setting
- Identify, with the help of other Girls' Brigade team members, a local leader who will support and informally mentor them as they settle and grow in their new role

- Provide the church representative with at least one reference confirming your suitability for the role
- Complete the [Volunteer Registration Form](#) and get the church representative to sign it to confirm that safer recruitment processes have been followed and satisfactory references have been received
- Return the Volunteer Registration Form and the satisfactory enhanced DBS disclosure to the GB Support Centre, confirming the completion of the relevant modules from **n:fluence 18+**
- Receive confirmation, from the GB 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. Young people can remain in the n:spire section, or as Advanced Young Leader, until the age of 25 but require DBS checks once they're Advanced Young Leaders (16+) or adults (18+).
- It's not best practice for all the leaders at one group to be from the same family
- If you've just got a new DBS check, you have 19 days (from the date on your DBS) to register it online with the DBS Update Service. This means The Girls' Brigade can then view your disclosure status online and you never need to complete another DBS check for us! You then need to complete GB's [Verification of DBS Status Form](#) to let us know you've done this. OR, if you're unable to register for the Update Service within the 19 days, you'll need to show your new disclosure to the minister of your church (the DBS allow this as your church are involved in the recruitment process of all GB leaders) and they/you will need to complete GB's [Verification of DBS Status Form](#).

5.3 Guidelines

For clarity and explanation, the following should be noted:

- All volunteers are required to undertake GB safeguarding training (in addition to any training that may be required as part of their job or other volunteer roles) as an integral part of their mandatory Life to the Full training.
- All new volunteers are required to undertake the relevant parts of the **n:fluence 18+** training materials.
- The **n:fluence 18+** resource provides the following modules of training:
 - o Mission
 - o Children/young people
 - o Pastoral care
 - o Relationship
 - o Programme

- o Leadership (for team leaders)
- o Safeguarding.
- 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.
- If required by the church, volunteers will also be expected to complete denominational safeguarding training at the appropriate level e.g. foundation or advanced.
- Volunteers are expected to participate in ongoing development and training opportunities, to help ensure that activities are relevant, and that good practice is maintained in their work with children and young people.
- Specialised training is required 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 The Girls' Brigade's websites and social media.

Volunteers who wish to serve on The Girls' Brigade Trustee Board or Network Executive should submit expressions of interest outlining their suitability for the position, bearing in mind the Trustee or Network Exec member role profiles. Separate induction training will be provided for these roles.

5.4 Procedure for the appointment of staff

- When a staff vacancy arises, job descriptions will be drawn up.
- The post will be advertised via The Girls' Brigade websites and relevant local and Christian press with a closing date of not less than 15 days from the placing of the advert. The advert will reference The Girls' Brigade safe recruitment policy and the need for a DBS check.
- All applicants will be required to complete an application.
- Once the closing date is passed, a short-listing process will take place.
- Throughout the appointment process, The Girls' Brigade will adhere to its equality, diversity and inclusion policy.
- At interview all applicants will be asked a set of competency-based questions and may be asked to undertake a task appropriate to the role.
- Interview panels will usually comprise three people and will include senior staff as relevant to the role.
- Once a candidate is selected for appointment, references will be taken up.

- Reasons for non-selection of candidates will be clearly identified and might include:
 - 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.
- 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 Chief Executive.
- Each employee is responsible to a line manager with whom update meetings are held to establish work patterns and monitor workload.
- An ongoing appraisal programme is used to provide support, monitor performance, assess training needs and measure competency.

5.5 Policy on the recruitment of ex-offenders (staff and volunteers)

It's The Girls' Brigade's policy to require applicants to disclose any 'unspent' criminal convictions as part of their application. The Rehabilitation of Offenders Act 1974 and the Legal Aid and Sentencing and Punishment of Offenders Act 2012 state that ex-offenders are not required to disclose to prospective employers convictions defined as 'spent' under the Act (unless the post is covered by the Exceptions Order). The Act defines time periods after which different types of convictions become spent. It also makes it illegal for employers to discriminate against an ex-offender on the grounds of a spent conviction.

All Girls' Brigade roles that involve working with children and young people come into the scope of the Exclusions and Exceptions Order. This means that even 'spent' convictions must be declared when applying for a post.

Having a criminal record will not necessarily bar an individual from working with The Girls' Brigade, depending on the nature of the position and the circumstances and background of the offence(s) and the relevance to the post in question.

The Girls' Brigade will not discriminate unfairly against applicants with a criminal record. The Girls' Brigade demonstrates its commitment to the fair treatment of its staff, volunteers and service users as stated in our Equal Opportunities Policy.

Policy on disclosures and declaring convictions:

- For those positions where a disclosure is required, all application forms and recruitment details will contain a statement that a disclosure will be requested in the event of the individual being offered the position.
- Where a disclosure is to form part of the recruitment process, candidates will be required to provide details of their criminal record with the initial application. We guarantee that this information is only seen by those who need to see it as part of the recruitment process. Volunteers will be consulted as to whether they wish to continue with their application before any information is shared.
- Unless the nature of the position allows The Girls' Brigade to ask questions about an applicant's entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.
- Where the role applied for involves working with children and young people under the age of 18 then this represents an exception to the Act, and as such, applicants are expected to declare their convictions even if they are 'spent'.
- If the role applied for is working with children, and the applicant has conviction details on their disclosure, the DBS certificate, a statement from the applicant of the account and two character references must be sent to the GB Support Centre marked 'Private and Confidential' for the attention of the Safeguarding Lead. This must be done within two weeks from the DBS certificate being issued. On receipt of the above the Safeguarding Lead commission a risk assessment.
- A panel of three suitably experienced people will be convened to consider the risk assessment and determine whether the volunteer can volunteer for GB and if so, what safeguards should be put in place. The Safeguarding Lead will contact the applicant and Team Leader/District/Church in writing with the outcome of the risk assessment.

6 EQUALITY, DIVERSITY AND INCLUSION POLICY

‘Everyone Included, Everyone Valued, Everyone Safe’

6.1 Introduction and Purpose

The Girls’ Brigade is a Christian youth organisation dedicated to empowering predominantly girls and young women through inclusive and transformative experiences. We partner with churches to provide safe spaces where all individuals are valued as created in the image of God. GB welcomes and affirms everyone, regardless of age, gender identity, disability, race, ethnicity, nationality, sexual orientation, socio-economic background, or any other characteristic. In short, the GB equality, diversity, and inclusion (EDI) policy can be summed up with the phrase: ‘Everyone Included, Everyone Valued, Everyone Safe.’

Our commitment to equality, diversity, and inclusion is rooted in our belief that each individual reflects the image of God. GB actively seeks to comply with all relevant legislation and best practices, including the Equality Act 2010, and works to ensure fairness in all aspects of its ministry.

GB has always strived to include everyone, and groups make all kinds of reasonable adjustments to include those with disabilities, those who are neurodiverse, and those who have any additional needs. See Steph’s story for an inspiring example: [At GB I’m seen as me – not through the lens of my disability](#). We also have resources available to support inclusion of young people with SEND. Refer to the password protected pages on our website providing resources in these areas.

We will make all necessary reasonable adjustments to ensure that everyone can participate fully and no one is left out or left behind.

6.2 Reflecting on Biblical Teachings

Our commitment to EDI is inspired by Biblical principles, including:

- *Imago Dei (Genesis 1:27)*: Recognising that every person is created in the image of God and worthy of respect and dignity.
- *Love and Compassion (Mark 12:31)*: Loving our neighbour as ourselves, celebrating diversity as part of God’s creation.
- *Justice and Equity (Micah 6:8)*: Acting justly and showing kindness, especially to those who are marginalised.
- *Unity in Christ (Galatians 3:28)*: Affirming that all are one in Christ, regardless of gender, race, or status.

Through these Biblical principles, we are called to create groups that reflects God's kingdom. Groups that are welcoming, inclusive, and equitable.

6.3 Legal and Policy Framework

Understanding and complying with legal requirements is crucial for providing a safe and equitable environment:

- *Equality Act 2010 (UK)*: This legislation prohibits discrimination on the basis of sex, gender, religion or sexual orientation, among other protected characteristics. As a youth organisation, we are legally required to uphold these standards.
- *Safeguarding Policies*: GB leaders must adhere to safeguarding policies designed to protect all children and young people from harm, including those who may be vulnerable due to their gender, sexuality, ethnicity, disability or social background.

If you encounter situations where you need additional guidance, reach out to GB Support Centre for support.

Creating an environment where everyone is welcome, valued, and safe is an ongoing process. It requires continuous reflection, learning, and adaptation.

Leaders are encouraged to:

- *Review and implement*: Regularly review this guidance and make necessary adjustments in your group.
- *Engage with training*: Participate in available training sessions (online and face-to-face) to deepen your understanding of gender inclusivity.
- *Seek feedback*: Actively seek feedback from participants and young leaders, especially those with lived experience, to ensure your approach remains responsive and relevant.

6.4 Guidelines

6.4.1 Our Commitments

We will:

1. Foster an inclusive environment
 - o Ensure all members feel welcomed, valued, and safe.

- o Create spaces where differences are celebrated, and everyone can thrive.
- 2. Promote equity
 - o Identify and remove barriers to participation, ensuring fair access to opportunities and resources.
 - o Make reasonable adjustments to accommodate additional needs.
- 3. Challenge discrimination
 - o Proactively address and prevent all forms of discrimination, bullying, and exclusion.
 - o Train leaders to recognise and respond to discriminatory behaviour.
- 4. Equip and educate leaders
 - o Provide ongoing EDI training and resources for staff and volunteers.
 - o Model positive attitudes and behaviours that reflect GB's inclusive ethos.
- 5. Ensure accessibility
 - o Adapt activities and materials to meet the diverse needs of members.
 - o Collaborate with parents/carers and young people to identify and implement adjustments to make sure all can participate.
- 6. Communicate respectfully
 - o Use non-discriminatory language in all materials, communication, and activities.
 - o Recognise and respect individuals identities and preferences.

6.5 Expectations of Leaders and Volunteers

All involved in The Girls' Brigade are expected to:

- Treat everyone with dignity and respect, fostering a culture of belonging
- Make reasonable adjustments to meet the needs of those with disabilities or additional needs
- Notify the GB Support Centre of the disabilities or additional needs of any volunteers
- Speak and act in ways that affirm the value and worth of all individuals
- Challenge discriminatory behaviour, including bullying, exclusion, derogatory language, or language that perpetuates stereotypes
- Work in partnership with local churches to uphold these values in all aspects of GB life.

6.6 A Living Commitment

Together, we affirm our shared responsibility to build groups where 'Everyone Included, Everyone Valued, Everyone Safe' is not just

an EDI principle but a lived reality. GB recognises that EDI is an evolving area. We will regularly review and update our practices to reflect new legislation and emerging best practices, ensuring our approach remains relevant and effective.

For further support or guidance, leaders can access detailed resources and training provided by the GB Support Centre.

7 GENDER INCLUSION GUIDANCE

7.1 Introduction

The Girls' Brigade (GB) aims to create a safe, supportive, and welcoming environment for predominantly girls and young women aged 4-18, as well as for those aged 18-25 in leadership roles. As an inter-denominational Christian organisation, we work with a diverse range of churches, each with different theological views. This diversity means that while we respect various perspectives, our priority remains providing a person-centred, inclusive space where everyone feels welcome.

7.2 Purpose

This gender guidance document is designed to help GB leaders with practical knowledge and skills to foster safe, inclusive environments that meet the needs of all involved in GB. It links biblical teachings with legal obligations and best practices, providing actionable steps for leaders. Specific guidance on welcoming trans young women and men can be found in Appendix A, along with a glossary of terms.

7.3 Why Gender Guidance Matters

Research, such as the 2024 Girls' Attitudes Survey, highlights persistent gender inequalities. Girls and young women face unique societal and structural barriers that often differ from those faced by boys and young men.

For example:

- Girls report lower levels of confidence and optimism about the future compared to boys.
- Gender stereotypes and expectations limit opportunities for girls, affecting their self-esteem and personal development.
- There is a higher risk of gender-based harassment and discrimination that impacts girls' well-being.

These challenges underline the importance of creating safe spaces where young people can explore these issues, build resilience, and develop confidence.

7.4 Core Values and Principles

The Girls' Brigade is built on values of Fun! Sound! Friendship! Living it! Yes! and Discovering Jesus!

Our approach is rooted in:

- *Person-Centred Leadership*: Treating each person as an individual, acknowledging their unique experiences and needs.
- *Biblical Compassion and Justice*: While specific theological views may differ across denominations, GB upholds the biblical principles of the Yes! In the bible to welcoming the marginalised and creating a loving, just environment for all (e.g., Galatians 3:28: "There is neither Jew nor Gentile, neither slave nor free, nor is there male and female, for you are all one in Christ Jesus").
- *Legal Compliance and Best Practice*: Adhering to current equality legislation, including the Equality Act 2010 (UK), which protects against gender discrimination, and ensuring we meet safeguarding obligations.

7.5 Reflecting on Biblical Teachings

While GB does not take an explicit theological position on issues of gender, the following passages can help guide your approach:

- *Genesis 1:26*: 'Let us make male and female in our image and in our likeness,' God is neither male nor female but transcends gender. Equally, we are called to value each individual as they are created in the image of God.
- *Galatians 3:28*: Emphasises the unity of all people in Christ, breaking down divisions based on gender, race, or social status.
- *Micah 6:8*: Calls us to "act justly, love mercy, and walk humbly with our God," encouraging leaders to act with kindness and fairness.
- *Matthew 25:40*: "Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me." This verse underlines the importance of serving and supporting everyone, especially those who may feel marginalised.

We also reflect importantly on Jesus' mother, Mary. A woman who was of no regard in society, lived a life on the margins in a forgotten town. A woman who changed the course of history by saying yes to God. Her marginalised status as a woman from Nazareth leads us to recognise and embrace those who are marginalised in our society today. We recognise the theme within the whole story of scripture that those who are often seen on the outside are consistently welcomed by God and in the earthly ministry of God in Christ. Women were the first to see the risen Christ, first to spread the message of resurrection and first to care for and tend to Jesus. Despite their low and marginal status in the society of the time. In the same way, Girls' Brigade seeks to welcome and embrace those

who are on the edges for in them we discover something of the image of God.

7.6 Practical Guidance for Leaders

The following advice is designed to help GB leaders ensure that everyone who is involved in GB can feel valued, respected, and safe:

7.6.1 Creating a Welcoming Environment

- *Language matters:* Use inclusive and affirming language when addressing groups. Avoid making assumptions about gender identities or experiences.
- *Visibility of inclusivity:* Display clear signage or posters indicating that all are welcome, regardless of gender identity or expression. This simple step can help reinforce a sense of belonging.
- *Personal introductions:* Respect each individual's preferred name and pronouns. If you're unsure, ask politely or give space for introductions where participants can share their pronouns if they wish.

7.6.2 Understanding and Addressing Gender Barriers

- *Be aware of gendered expectations:* Girls in particular face societal pressures around appearance, behaviour, and future aspirations. Challenge gender stereotypes when they arise and encourage girls to pursue their interests without restriction.
- *Support confidence building:* Facilitate activities that allow all people to build confidence, practice leadership, and voice their opinions. Highlight their strengths and celebrate their achievements.

7.6.3 Handling Sensitive Conversations

- *Provide a listening ear:* If a participant shares concerns about gender identity or experiences discrimination, listen without judgment and offer support. Ensure they know their safety and well-being are your priority.
- *Know when to seek support:* Some issues may require additional support or intervention. Familiarise yourself with GB's safeguarding policies and procedures, and do not hesitate to involve designated safeguarding officers when necessary.

7.6.4 Be Aware of Unconscious Bias

- Reflect on your own potential biases and how they may affect your interactions. Consider training sessions on gender sensitivity and inclusivity as part of ongoing development.

7.6.5 Responding to Theological Differences

- *Respecting diversity of beliefs:* Be mindful that theological views on gender and sexuality may differ among your group and partner churches. However, the primary focus must always be on creating a safe, inclusive space for every participant.
- *Focusing on shared values:* Emphasise shared biblical values of love, justice, and inclusion. Ensure all activities reflect GB's commitment to welcoming everyone, irrespective of background or identity.

7.7 Legal and Policy Framework

Understanding and complying with legal requirements is crucial for providing a safe and equitable environment:

- *Equality Act 2010 (UK):* This legislation prohibits discrimination on the basis of sex, gender reassignment, and sexual orientation, among other protected characteristics. As a youth organisation, we are legally required to uphold these standards.
- *Safeguarding policies:* GB leaders must adhere to safeguarding policies designed to protect all children and young people from harm, including those who may be vulnerable due to gender identity or expression. Being LGBTQ+ is not in itself a safeguarding issue and no action needs to be taken if someone comes out as LGBTQ+. Safeguarding issues can arise if a young person is being exploited or abused as a result of their sexuality and normal safeguarding procedures should be followed as per any young person in our care.

If you encounter situations where you need additional guidance, reach out to the GB Support Centre for support. Additionally, consider connecting with local LGBTQ+ support organisations for resources or training on best practices for inclusion.

7.8 Inclusion of Transgender Young Women

The Girls' Brigade is committed to providing a warm, welcoming space for all girls and young women, including those who are transgender. Here's how you can support trans members specifically more effectively:

7.8.1 Understanding Transgender Identity

- Transgender young women are people who were assigned male at birth and who now identify and live as women. They often face heightened levels of discrimination and need affirming environments where their gender identity is respected.
- Using correct names and pronouns is vital. This simple act of respect affirms trans members of GB and helps foster a sense of belonging.

7.8.2 Creating a Safe Space

- Ensure that all members understand the importance of respect and inclusivity. Use group agreements or ground rules to set expectations for behaviour, including respect for all identities.
- If concerns arise about a trans member's participation, handle these privately and sensitively, engaging with the GB Support Centre if necessary. Emphasise that The Girls' Brigade is a place for all girls and young women, and every member has the right to feel safe and included.

7.8.3 Facilities and Privacy

- Provide options for changing facilities that prioritise privacy. This could include offering individual toilets and non-gendered spaces, if available.
- Respect the choice of the individual regarding which facilities they feel most comfortable using.

Respecting the individual is a key priority for all those who work for, lead and attend the Girls' Brigade. Transgender young women are no different when it comes to that respect and welcome.

7.9 Inclusion of Transgender Young Men

The Girls' Brigade is committed to being a safe and welcoming space for all young people. While the organisation focuses on girls and young women, there may be instances where members transition to identify as male while attending Girls' Brigade. Here's how you can support them:

7.9.1 Supporting Young Trans Men

- *Respect their identity:* If a young person transitions and begins identifying as male while attending The Girls' Brigade, affirm their chosen name and pronouns. Let them know they are welcome to continue attending if they feel comfortable in the space.
- *Create a dialogue:* Have an open and private conversation with the young person (and their parent/guardian if appropriate) about their needs and how best to support them in their transition. Respect their preferences regarding how they would like to engage with the group moving forward.
- *Affirm:* Be clear with the group that everyone's identity is respected and that being a welcoming and supportive community is central to GB's values.

7.9.2 Continuing Membership

Young trans men who have grown up in the Girls' Brigade may wish to stay because of the relationships, mentorship, and sense of belonging they've experienced. While GB is predominantly a girls' organisation, exceptions can be made on a case-by-case basis to ensure the young person feels supported. In areas where there is no uniformed Boys group, Girls' Brigades are mixed groups.

- *Encourage belonging:* Let the young person decide whether they wish to participate in the same way as before or whether adjustments are needed for their comfort.
- *Explore leadership opportunities:* If the young person is aged 18 or older, discuss leadership pathways within GB, focusing on roles where their identity and contributions will continue to be valued.

7.9.3 Reinforce Group Values

Use this as an opportunity to remind the group of GB's core values. Emphasise the importance of supporting one another through all life changes.

By taking a compassionate, person-centred approach, you can ensure that young trans men feel seen and supported during their transition, while maintaining the safe and affirming environment The Girls' Brigade is known for.

7.10 Conclusion and Next Steps

Creating a gender-inclusive environment is an ongoing process. It requires continuous reflection, learning, and adaptation.

Leaders are encouraged to:

- *Review and implement:* Regularly review this guidance and make necessary adjustments in your group.
- *Engage with training:* Participate in available training sessions (online and face-to-face) to deepen your understanding of gender inclusivity.
- *Seek feedback:* Actively seek feedback from participants and young leaders, especially those with lived experience, to ensure your approach remains responsive and relevant.

7.11 Additional Resources

[Downloadable document](#): Access a concise version of this guidance, along with [supporting materials](#), on The Girls' Brigade website.

[Training Video](#): Watch the supplementary video for practical tips and examples on implementing this guidance in your group sessions.

This guidance aims to help you foster a warm, inclusive, and safe environment that reflects The Girls' Brigade's core values. By championing equality and embracing diversity, you are helping empower the next generation of confident and resilient young women.

8 DATA PROTECTION POLICY

8.1 Introduction and purpose

The Girls' Brigade needs to gather information about individuals 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.

8.2 Purpose

The purpose of this policy is to ensure that:

- The Girls' Brigade complies with data protection legislation, including the Data Protection Act 2018, the UK General Data Protection Regulation, and good practice
- It respects the rights of individuals including staff, volunteers and members
- The Girls' Brigade is open about the information it holds, and how it stores and processes individuals' data
- The Girls' Brigade's staff and volunteers are trained and supported
- The Girls' Brigade is committed to notifying the Information Commissioner in the event of a data breach.

8.3 Definitions

Data controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. For the purpose of this policy, The Girls' Brigade is a Data Controller (The Girls' Brigade England & Wales, Cliff College, Calver, Hope Valley, Derbyshire, S32 3XG).

Data processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

Data Protection Officer (DPO): DPOs assist an organisation to monitor internal compliance, inform and advise on data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for data subjects and

the Information Commissioner's Office (ICO). The Data Protection Officer can be contacted via email to gbc@gb-ministries.org or telephoning the GB Support Centre on 01246 582322.

Data subject: refers to any living person who is the subject of personal data (see below for the definition of 'personal data') held by the organisation. A data subject must be identifiable by name, ID, address, online identifiers or other factors such as physical, physiological, genetic, mental, economic or social factors

Information Commissioner's Office (ICO): the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals

Personal data: means any information that identifies, directly or indirectly, a data subject

Processing: refers to any action taken in relation to personal data including, but not limited to, collection, adaptation, alteration, recording, storage, retrieval, consultation, use, disclosure, dissemination, combination or deletion, whether by automated means or otherwise

Special categories of data: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, biometric data (where used for identification purposes), data concerning health, data concerning a person's sex life or sexual orientation Data Controller.

8.4 Data Protection Principles

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

8.5 Scope

This policy applies to:

- The GB Support Centre
- All districts of the Girls' Brigade 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 GB policy.

8.6 Privacy Notice

The Girls' Brigade is committed to informing all data subjects about the processing of their data beforehand so that they are able to make an informed decision about whether or not to provide that data. A full privacy notice is available on the GB website. The Girls' Brigade has complied with Article 13 and 14 of the UK GDPR which lists the content that needs to be included in the privacy notice and shorter statement.

8.7 Key risks

The Girls' Brigade 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.

8.8 What to do if a data breach is suspected or occurs

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

Support Centre via email to gbc@gb-ministries.org.

Where the data breach contains information that is considered high risk for individuals you will also need to report this to the Information Commissioner's Office (ICO) within 72 hours of the data breach occurring. This can be done via telephone or online and further details can be found [here](#).

Where there is a high risk to the data of individuals, you must notify them of the data breach so that they can take the necessary steps to protect themselves.

Where the incident involves an individual or organisation gaining fraudulent access to the data or to your laptop or computer you may also need to report this to the Police and Action Fraud. Details of how to do this can be found [here](#).

8.9 Confidentiality

The Girls' Brigade operates under a policy of confidentiality. The Girls' Brigade is committed to providing confidential services to their stakeholders and ensuring that all personal data about staff, trustees, volunteers and other stakeholders is treated as confidential and is collected, processed and retained in line with the data protection law. In certain situations, information may need to be shared with third parties, for example to protect the welfare and safety of young people that are part of the service delivery.

8.10 Accountability

In accordance with law requirements, the organisation keeps records so that they can demonstrate the steps taken to comply with the UK GDPR:

- Record of Processing Activities (ROPA) spreadsheet identifies information such as the category of personal data processed for each data subject, the lawful basis of the processing, data retention, data storage, who is responsible for the data and who has access to the data.
- The Activity, Incident and Risk reporting spreadsheet keeps a log of key information such as discussions and decisions about data protection, identified risks, any personal data breaches and response, training of staff and volunteers, requests to exercise any rights by data subjects and management of those requests, notifications to the ICO.

- Legitimate Interests' Assessments (LIA) that have been carried out
- Data Protection Impact Assessments (DPIA) that have been carried out to justify the approach where processing poses particular risks (such as processing of special category of data).
- Data Protection Policy which includes most procedures relating to data protection.
- Privacy Notice for data subjects.
- Data Processing Agreements with databases, CRM and cloud providers and other data processors.
- Data Sharing Agreements (also called information sharing protocol) with other data controllers or joint controllers.
- Appropriate Policy Document which may be completed in some circumstances outlined by the DPA (2018) when processing special category of data or criminal records.

8.11 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:
 - o Keeping the Trustee Board updated about data protection responsibilities, risk and issues
 - o Reviewing data protection procedures and policies
 - o Arranging training and advice for people covered in this policy
 - o Handling data protection queries from staff, volunteers and anyone else affected by this policy
 - o Responding to requests from individuals and others to see the data that the GB Support Centre holds about them. These are called Subject Access Requests.
 - o Ensuring that any contracts or agreements with third parties who may handle data comply with The Girls' Brigade's policies and procedures
 - o Monitoring compliance with Data Protection law and with The Girls' Brigade's policies and procedures
 - o Advise on, and to monitor, data protection impact assessments; cooperate with the supervisory authority; and be the first point of contact for supervisory authorities and for individuals whose data is process (employees, customers, etc).
- The CEO is responsible for:
 - o Addressing any queries from the media
 - o 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.
- Access: The Girls' Brigade is the data controller and will therefore have access to all the data that is collected on its staff, members, volunteers, donors etc.

Significant breaches of this policy will be handled under The Girls' Brigade's disciplinary procedures.

8.12 Personal data and processing

The Girls' Brigade processes personal information in line with its privacy notices 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.

8.13 Lawful basis for collection of personal information

Under Article 6 of the UK GDPR, the following six possibilities are used for processing personal data:

- With consent of the data subject
- For a contract involving the data subject
- To meet a legal obligation
- To protect any personal vital interests
- For government and judicial functions
- In the organisation's legitimate interests provided the data subject's interests are respected.

Where an individual wishes to exercise their rights in any of these areas they should contact The Girls' Brigade's Data Protection Officer. These rights are provided free of charge and must be completed within one month, unless this is not possible or deemed excessive, in which case GBM must contact the individual within the month to state the reason for the extension and/or the charging of an appropriate fee.

Personal information is collected and processed by The Girls' Brigade to administer the individuals' membership and the activities of The Girls' Brigade. 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 The Girls' Brigade 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 special category information, as defined under Article 9 of the UK GDPR, that may include:

- Physical or mental health details

- Racial or ethnic origin
- Political beliefs
- Philosophical beliefs
- Religious or other beliefs of a similar nature
- Trade union membership
- Gender
- Sexual orientation.

In the case of members, personal 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 The Girls' Brigade this will be on the legal basis of contractual obligation. For any special category of information, such as ethnicity, we rely on explicit consent. Any processing will be proportionate and relate to the provision of the services and activities of The Girls' Brigade. 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 legitimate interest of the individual. Any processing will be proportionate and relate to the purposes of fundraising or promotion of the purpose, objectives and activities of The Girls' Brigade.

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.

8.14 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 The Girls' Brigade's Data Protection Officer.

8.15 Additional Compliance Obligations

The Girls' Brigade is committed to comply with additional obligations in reference to the UK GDPR and the Data Protection Act 2018. These include:

- Security and Accuracy of Information
- Data Subject Rights
- Risk Assessment
- By design and by default
- Protection of children
- Fees.

8.16 Security and accuracy of information

The Girls' Brigade'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 a 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 Girls Brigade Manager 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. Two factor authentication is available and The Girls' Brigade advises this is switched on by each user.
- 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 GB 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.
- The GB Support Centre staff will verify personal information when a volunteer calls for information or advice.
- Member joining information will be entered onto GB Manager and destroyed once input. Parents, guardians and members will be asked to confirm the accuracy of data at least once every twelve months. Six monthly updating is recommended.
- Volunteer information will be reviewed annually as part of the annual census process and updated as new information is provided to the GB Support Centre, for example where new leader registrations are received or notification of volunteer leaders leaving or retiring.
- Team leaders should ensure that the GB Support Centre is updated as soon as there is a change to a leader's information, for example leaving a group or retiring.
- GB leaders are able to update their own information through GB Manager 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 Girls' Brigade Data Protection Officer.

8.17 Individual rights

Under the UK GDPR, data subjects 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 The Girls' Brigade's Data Protection

Officer. These rights are provided free of charge and must be completed within one month, unless this is not possible or deemed excessive, in which case we will contact you within the month to state the reason for the extension and/or the charging of an appropriate fee.

8.18 Risk Assessment

Risk Assessment is an important part of the accountability of an organisation. It is vital that the organisation is aware of all risks associated with personal data processing and it is via its risk assessment process that the organisation is able to assess the level of risk.

It is the policy of the organisation not to transfer or share data into an environment that is not considered compliant with UK data protection law. Where personal data processing is carried out using new technologies, or when a high risk is identified in relation to the rights and freedoms of natural persons, the organisation is required to engage in a risk assessment of the potential impact, also known as a 'Data Protection Impact Assessment' (DPIA). More than one risk may be addressed in a single DPIA. The organisation has developed and agreed upon a procedure for completing a DPIA. This procedure is always followed where there is a need to measure risk. The procedure is completed by the Data Protection Lead and, if necessary, the opinion of a professional Data Protection Practitioner is taken into account.

In addition to this, and if the outcome of a DPIA points to a higher risk than the organisation intended and personal data processing could result in distress and/or may cause 'damage' to the data subjects, it is for the Data Protection Lead to decide whether the organisation ought to proceed, and the matter should be escalated. In turn, the accountable person may escalate the matter to the regulatory authority (prior agreement) if significant concerns have been identified.

8.19 By design and by default

This policy includes procedures in relation to data protection across the organisation, involving different staff members, teams and delivery. As the organisation aims towards full compliance, and therefore also towards a data protection "by design and by default", these procedures will be embedded into the operating guidance as appropriate.

The goal of this principle would mean that in the organisation, everyone who starts a new project or sets up a system or process

must ensure that they incorporate data protection as a matter of course, consulting the Data Protection Lead. Consideration of the data protection implications should be a standard check point before any project or system is signed off.

8.20 Protection of children

The UK GDPR does not treat children particularly differently from adults, but the organisation is committed to take appropriate precautions, in particular:

- When you are considering 'legitimate interests' as lawful basis, the organisation will be particularly careful not to override the interests of the data subject .
- When providing information to children about how their data will be processed, the organisation ensures that they will genuinely be able to understand it.
- Requests to exercise data subject's right will have a particular weight when involving data around children.

8.21 Registration to the ICO and fees

The organisation has registered with the Information Commissioner as it engages in the processing of personal information identifying data subjects directly or indirectly. The organisation pays an annual fee to the ICO, as required by law.

8.22 Data Protection Principles

The UK General Data Protection Regulations (UK GDPR) describe how an organisation should collect, process and store personal information. This applies to both electronic and paper-based data. The UK GDPR are underpinned by seven principles. These are:

TYPE OF DATA	GUIDELINE RETENTION PERIOD
EMPLOYEE RECORDS	
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
VOLUNTEER RECORDS (including trustees)	Six years after volunteer's last engagement with The Girls' Brigade
Details of DBS checks	In accordance with DBS
DONOR AND SUPPORTER RECORDS	
Name and address details	Six years
Bank and credit card details	Until stop request received
TPS suppression request	Indefinitely
Email address	Three years

TYPE OF DATA	GUIDELINE RETENTION PERIOD
DONOR AND SUPPORTER RECORDS	
Gift aid declarations	Six years after the end of the accounting period they relate to
Consent for campaigns	Until campaign end date
MEMBER RECORDS	Six years after member's last engagement with The Girls' Brigade
SUPPLIER AND CONSULTANT RECORDS	
Name and contact details	Six years after contract ends
Copies of contracts	Six years after expiry or termination of contract

9 INFORMATION TECHNOLOGY AND SOCIAL MEDIA POLICY

9.1 Policy statement

Information technology and social media have an increasingly significant part to play in GB life. To ensure the safety of members and our integrity, The Girls' Brigade is committed to ensuring that all volunteers are advised in the safe use of IT and social media. This is an essential aspect of our overall safeguarding policy. We acknowledge 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 GB life. GB 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 GB evening and, at times, beyond. The Girls' Brigade is committed to modelling and practising 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.

9.2 Guidelines

The following guidelines are provided to assist leaders in the responsible use of IT and social media. It will be helpful to read this section in conjunction with the latest NSPCC guidance which can be found [here](#).

9.3 Use of pictures and videos

- Pictures of GB members under 18 years of age may only be taken for personal or publicity purposes if consent has been received. Parental consent is needed for those under 16. This may be sought using the [GB Joining Form](#) which should be kept indefinitely. See the Data Protection Policy in [section 8](#).
- It is good practice not to allow leaders to take pictures on personal mobile phones but to have a separate phone/camera for this purpose.
- It's good practice to involve children and young people in the consent process of their images/video. Inform them how their images may be used, be responsive to their feelings and respect their wishes.
- Photos taken for personal use should not be reshared years later e.g. on social media memory features.
- 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 GB 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 Girls' Brigade policy.
- YouTube videos can be shown in church/GB provided the video is on an official channel and you have permission from the copyright owner. So, you'd be fine to show our Girls' Brigade clips such as koko and Volumise as we give you permission to do so. Often, such videos are uploaded to YouTube and then embedded on the publisher's website with details of how they permit it to be used. If the description of the video on the publisher's website or YouTube channel indicates that they intend it to be used in a church service, then this would constitute consent. However, if there is any doubt, contact the publisher or copyright owner for permission before showing the video. Find out more [here](#). If you're unable to get permission or verify that the video is on an official channel, we recommend choosing a different video or sourcing the content in an alternative format, such as a DVD, stream, or legal download. Netflix, Amazon Prime Video, iTunes, and Movies Anywhere are all official sources of video content and may be used in conjunction with a Church Video License. Plus, some sites, like [WingClips](#) contain specific clips you can watch from films linked to Christian themes, so you might be able to find ones that link in with your programme and avoid a copyright issue.

9.4 The Girls' Brigade websites and social media channels (for publicity purposes only):

- It's the policy of The Girls' Brigade 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. The Girls' Brigade 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 libelous 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 Girls' Brigade official registered logo or 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 crest and logo can be downloaded from the Girls' Brigade website.
- 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.

9.5 Social media

Although it's The Girls' Brigade'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 GB group.

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

The Girls' Brigade expects that leaders and young people involved in The Girls' Brigade communicate on social media via a corporate account, not through personal, individual accounts. This can be achieved by applying the following principles:

- Set up a group/district group social media account to make connections with young people (under 18s) thus avoiding inappropriate one-to-one interactions through private social media 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 Girls' Brigade social media 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 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 GB members, they may be open to public view. Ensure that what is seen or read reflects the values and ethos that volunteers in The Girls' Brigade 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.

9.6 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 GB 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.
- 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.

9.7 Data Protection Considerations

- All staff are responsible for ensuring compliance with the Data Protection Legislation of UK when using social media platforms for organizational purposes.
- *Data protection principles:* Some key principles to keep in mind are:
 - o *Purpose limitation:* Staff should only use social media platforms for legitimate business purposes and should not disclose personal data beyond what is necessary for meeting the objectives.
 - o *Data minimization:* All staff should only share the minimum amount of personal data necessary to achieve the intended purpose on social media platforms.
 - o *Accuracy:* The staff should ensure that any personal data shared on social media platforms is accurate and kept up to date.
- *Receiving a subject access request (SAR):* During the course of use of any social media platforms, if you receive a SAR, please let the Data Protection Officer in the organisation know at gbc@gb-ministries.org.
- *Security measures:* Appropriate security measures must be taken to protect personal data shared on social media platforms, such as using the right privacy settings and strong passwords.
- *Monitoring and reporting:* The organisation should report any breaches or potential breaches of personal data on social media platforms to the Data Protection Officer/Lead or relevant authority. Please follow the data breach procedure of the organisation.
- *Training and awareness:* All staff should receive regular training and updates on data protection laws and best practices for using social media platforms.
- *External communication:* The staff should not disclose confidential or personal data of others on social media platforms without proper authorization from the person or the organisation.

9.8 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.
- Members accessing the internet during Girls' Brigade 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 beforehand 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.

9.9 Video call safeguarding

If you're using online video call software, such as Zoom, then please make sure you take additional precautions for safe calls, such as:

- Make use of the password and waiting room functions so your calls are only between you and the people you invite and not random 'Zoom bombers'.
- Ensure you have more than 2 leaders on a call and that they're logged on and set up in advance of the children and young people joining the call.
- Make sure you gain parental consent if 13s and over are joining the call – this could be as simple as an email from a parent
- Think about what can be seen in the background of your call and ensure that you/anyone likely to appear in the background is appropriately dressed.
- Keep a record of who attends your virtual sessions, like you would in 'real' life.

10 RISK ASSESSMENT POLICY

10.1 Policy statement

The Girls' Brigade 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, The Girls' Brigade requires that:

- Each GB 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.

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.

10.2 Guidelines

- It's a requirement to keep a brief, simple record of all risk assessments and The Girls' Brigade 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. Both are available to download for free from the GB website.
- 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 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.
- 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 website.

11 FIRST AID POLICY

11.1 Policy statement

The Girls' Brigade 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 a minimum standard of first aid knowledge and training should be provided across all groups and activities.

To provide this The Girls' Brigade requires that:

- Every group or event should have a first aid kit readily available and an appointed person to ensure that stock is maintained and in date.
- Where young people (under 18) are engaged in a GB group, event, or activity at least one named lead with a first aid qualification should be present.
- For residential events there should be two leaders present with a first aid qualification.
- Where activities are taking place over separate sites, and a first aider could not easily move between the activity sites, there should be at least one first aider per activity site.
- Where activities only involve adult members, members are encouraged to have a first aid qualified person present.
- Large-scale events or groups with over 65 young people participating should have two qualified first aiders present.
- Events or groups with over 120 young people participating should have three qualified first aid leaders present.
- For events with groups larger than this, advice should be sought from the GB Support Centre.
- Leaders who meet the minimum training requirements will have their training qualification registered on the GB Manager database.
- The Girls' Brigade encourages all leaders to undertake first aid training.
- Named first aid leads should undertake first aid training based on GB's minimum requirements unless they can evidence that they've already undertaken training in this area within the previous three years.

11.2 Training standard

The minimum standard for first aid training within The Girls' Brigade England & Wales is based on the syllabus of the Community Lifesaver Course provided by St John Ambulance. The course combines hands-on practice and supportive instruction, teaching

volunteers how to respond to a wide range of life-threatening situations involving people of all ages. The St John Ambulance Community Lifesaver Course is recommended by The Girls' Brigade as an affordable option with a syllabus reflecting real-life scenarios GB volunteers may find themselves in. You can find out more about the course [here](#).

The Girls' Brigade requires members to undertake this recommended course, an equivalent, or more advanced qualifications.

All first aid qualifications (except those held by healthcare professionals) must be renewed once every three years to remain current and valid for The Girls' Brigade use.

The Girls' Brigade does recognise that some professions by the nature of the job will have a first aid element; for example nurses, midwifery, police officers, medical practitioners, members of HM armed forces, ambulance care – assistants/paramedics/technicians, etc. Qualified and registered healthcare professions are required to provide evidence of an up-to-date qualification or registration which should meet the GB minimum standard.

We recognise that several health care professionals work in highly-specialised clinical environments and their exposure to medical emergencies may be limited or restricted to specialist input and leaders in these roles should undertake first aid training.

11.2.2 Course content

The St John Ambulance Community Lifesaver Course course content covers the following topics. Any alternative courses should also contain the below topics as a minimum standard and last for at least three hours:

- Adult, child, and baby resuscitation (CPR)
- Recognising and responding to chest pain
- Managing choking in adults, children, and babies
- Using a defibrillator: prompts and pad placement
- Conducting a primary survey
- Helping unresponsive individuals
- Controlling bleeding
- Responding to seizures.

11.2.3 Externally-recognised courses

Other first aid qualifications are available and may be undertaken as an alternative, providing they are underwritten according to a nationally approved syllabus or national organisation and meet the following requirements:

- Must be set by a reputable body, such as British Red Cross, St John Ambulance or have a syllabus approved by the Health and Safety Executive
- Involve at least three hours of training
- Cover the main areas of the first response syllabus
- Be delivered by an adult holding a full first aid qualification and teaching qualification.

The following providers and courses are equivalent to or exceed the minimum standard of The Girls' Brigade England & Wales:

- British Red Cross Standard First Aid Certificate
- British Red Cross Practical First Aid Certificate
- St Andrew's Ambulance Association Standard First Aid Class Certificate
- British Association of Ski Patrollers Emergency First Aid
- British Association of Ski Patrollers Standard or Advanced First Aid
- British Association of Ski Patrollers Emergency Medical Technician
- Royal Yachting Association First Aid Certificate
- British Canoe Union Aquatic First Aid (Level 1 or 2)
- Royal Life Saving Society Bronze Medallion
- St John Ambulance Lifesaver First Aid Certificate
- St John Ambulance Lifesaver Plus First Aid
- St John Ambulance Emergency Aid for Appointed Persons (Schools)
- St John Ambulance First Aid at Work
- Health and Safety Executive First Aid at Work Certificate.

This is not a definitive list of equivalent qualifications. If you've undertaken first aid training that meets the four requirements for externally-awarded qualifications, then you will fulfil GB's minimum requirements. However, if you require clarification please contact the GB Support Centre.

The Girls' Brigade recognises that first aid training is a skill for all and encourages its young people (those over 14 to undertake the GB Essential Life Support and Emergency Aid course, although no member under the age of 18 may act in the capacity as a GB qualified first aider. GB Essential Life Support and Emergency Aid certificates for those under 18 will be annotated to note they undertook the training prior to their eighteenth birthday.

12 WHISTLEBLOWING POLICY (PUBLIC INTEREST DISCLOSURE)

12.1 Purpose

The Girls' Brigade is committed to ensuring that anyone volunteering their service can do so in an enjoyable and safe environment. We recognise our duty of care to all volunteers when performing their role and taking part in our activities. We therefore promote the highest standards of transparency and accountability in everything we do.

These standards are set out in our values and vision, as well as our policies and procedures as set out in this document – Life to the Full. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring unlawful or unethical conduct.

The Girls' Brigade aims to foster a culture of openness and accountability as essential to prevent such situations occurring and to address them promptly and effectively when they do occur. Whistleblowing enables genuine wrongdoing to be reported so that something can be done about it.

The Whistleblowing Policy applies to all GB volunteers who have a genuine concern regarding suspected wrongdoing or malpractice within the relevant whistleblowing criteria as explained below. If your concern doesn't fit the whistleblowing criteria, then consider using the complaints process.

Anyone who raises concerns reasonably and responsibly will not be penalised in any way, even if they turn out to be mistaken.

12.2 Scope

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work which falls outside the scope of other policies and procedures.

This may include:

- Criminal activity
- Miscarriages of justice

- Danger to health and safety
- Damage to the environment
- Breach of a legal obligation or regulatory requirement
- Bribery
- Financial fraud or mismanagement
- Unauthorised disclosure of confidential information
- Breach of our internal policies and procedures, including our code of conduct
- Conduct likely to damage our reputation or financial wellbeing
- The deliberate concealment of any of the above.

A whistleblower is a person who raises a genuine concern relating to any of the above whistleblowing criteria in the public interest. If a volunteer has a genuine concern related to suspected wrongdoing, malpractice or danger affecting any of our activities a report should be made under this policy.

The Girls' Brigade can exercise its discretion to use a different policy to deal with your concerns. Our Whistleblowing Policy sits alongside our Safeguarding and Anti-bullying and Harassment policies and our Complaints Procedure.

This policy should not be used where the concern is of an individual or personal nature (so not in the public interest) where there is no genuine concern in relation to wrongdoing, malpractice or danger. In these circumstances, a report should be made using the Complaints Procedure. This also means that you should not make a disclosure for personal gain.

The following factors will be considered when determining whether someone has made a disclosure in the public interest:

- How many people the disclosure affects
- Which interests the disclosure affects
- The nature of the wrongdoing, malpractice or concern
- The identity of the alleged wrongdoer or subject of concern.

If you have concerns about the safety or wellbeing of a young person or adult at risk, you must in the first instance follow the Safeguarding Policy and the matter must be reported to the GB Support Centre.

Crimes against a person or property should be reported immediately to the police. If any person or property is at immediate risk the Police should be called immediately.

Complaints relating to discrimination, victimisation or harassment should be dealt with through our Anti-bullying and Harassment Policy.

If you have concerns about the behaviour of another organisation you should raise them with that organisation. You should follow their whistleblowing procedures, if they have them.

If you are uncertain whether something is within the scope of this policy we encourage you to seek advice from the GB Support Centre.

12.3 Whistleblowing Policy Guidance

A volunteer who wishes to raise a concern that fits the whistleblowing criteria above should follow the Whistleblowing Policy, whether the incident is happening now, has happened in the past, or may happen in the future. It is important that the concern is raised without delay.

12.3.1 Volunteer responsibilities

We expect all volunteers to:

- Work within our code of conduct and the principles of Life to the Full
- Report all concerns promptly using the correct policies and procedures
- Never stop or discourage someone from making a disclosure
- Never criticise or victimise anyone for making a disclosure
- Not raise concerns with any malicious intent
- Cooperate with any whistleblowing investigation under this policy, being open and timely in the provision of information.

12.3.2 The Girls' Brigade's responsibilities

We will:

- Take concerns seriously
- Acknowledge receipt of the whistleblowing concern within a period of five days
- Consider whistleblowing reports carefully and undertake a thorough and prompt investigation where appropriate
- Keep you informed as to progress of the investigation if you wish
- Understand the difficult position a volunteer may be in when raising a whistleblowing concern
- Seek appropriate advice
- Take prompt action to resolve the concern or refer it to an appropriate person
- If the need arises, and if appropriate, report the concern to external agencies
- Ensure individuals who genuinely report concerns are not penalised in any way
- Treat any retaliation against or threats to victimisation of whistleblowers as a serious matter that may lead to disciplinary action against the perpetrator.

Deliberate misuse of this policy may lead to disciplinary action being taken, including suspension or termination of role.

12.3.3 How to report

If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with your group (or district) leader in the first instance. You may tell them in person or put the matter in writing if you prefer. You should also report your whistleblowing concern to the GB Support Centre on gbc@gb-ministries.org.

The Girls' Brigade encourage young people to speak to a parent, carer or trusted adult if they wish to report a matter through the Whistleblowing Policy so that they can be supported throughout the process.

12.3.4 Details required

- Your name and role within The Girls' Brigade. A report can be made anonymously, but The Girls' Brigade encourages the sharing of information where possible to enable the proper investigation of concerns.

- A contact telephone number and/or email address
- Who or what you are making a report about, including the names of the people involved
- Why you consider the matter falls within the whistleblowing criteria
- Where and when the events of the report happened
- Who else is aware of the issue
- Any action you or someone else has taken to address the issue
- The impact the concern has or may have on The Girls' Brigade.

If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls within our safeguarding, complaints policy or other relevant procedure, we will let you know and will ask that you redirect your concern accordingly.

12.4 Process

12.4.1 Action on receipt of a concern

Usually within five working days:

- Once the submission is received it will be acknowledged. We may contact the whistleblower for clarification and/or make internal enquiries as appropriate.
- The report will be recorded in the Whistleblowing Register held by The Girls' Brigade.
- Available information will be collected, including any documentation or statements supplied by the whistleblower.
- We will carry out an initial assessment to consider whether the matter should be investigated and to determine the scope of any such investigation. Reference to the criteria in the Whistleblowing Policy, Charity Commission or other relevant regulatory guidance may be used to make this decision.
- Depending on the outcome of the initial assessment, the Chief Executive may appoint an impartial investigator to carry out an investigation of the matter in line with the procedures set out below.
- On occasion, the report may be referred to external agencies/bodies as appropriate.

Usually within 10 working days, the whistleblower will be provided with the following information:

- The outcome of the initial assessment

- Confirmation on whether the matter will proceed to investigation and, if so, the name of the investigator
- If the matter will not be proceeding to investigation, an update regarding what action, if any is being taken and the reasons why
- Details of the nominated person for contact
- What action has been taken
- An indication of the anticipated timeframe to conclude the matter
- Information about support and protection for the whistleblower

If it has been determined that the matter will not progress to an investigation and you are not satisfied with this outcome, you can request that the decision be reviewed by the Chief Executive and the Operations Manager.

Any such request must be made in writing within 10 days of being notified of the outcome of the initial assessment. Any decision is final.

12.4.2 Investigation

Where the outcome of the initial assessment has determined that an investigation is necessary, an impartial investigator will be appointed; investigators may be volunteers, staff members or someone external to The Girls' Brigade.

The investigator will undertake any further enquiries required and will review all relevant documentation. They may contact anyone they reasonably consider to be able to provide pertinent information. This may include volunteers, staff and/or external people such as partner organisations.

If a volunteer is required to attend a meeting in regard to any investigation, they may request that an appropriate person attends with them to offer support. An appropriate person must respect the confidentiality of the disclosure and any subsequent investigation.

The Girls' Brigade may decide to refer the investigation to a relevant external body or authority such as the police or Charity Commission. They may also halt any investigation or hand over the enquiry to another body or authority. The whistleblower will be informed of this decision.

In some instances, an individual may wish to inform an external body or regulator, such as the Charity Commission. This is only

appropriate where an individual believes their concern has not been taken seriously by The Girls' Brigade and/or the matter raised is continuing despite the matter being considered and/or investigated internally under this policy.

It will very rarely if ever be appropriate to utilise the media (including social media) to raise your concerns. The Girls' Brigade strongly advise that any volunteer seeks appropriate advice before reporting a concern to anyone external.

All information in relation to any investigation will be treated as confidential within The Girls' Brigade. A report will be compiled by the investigator/s and will only be shared with the Chief Executive (unless they are implicated in the case). In these circumstances, an appropriate alternative person will be nominated to proceed with the review. Where appropriate, the report may also be shared with the Safeguarding Lead or other relevant staff members.

Depending on the outcome of any investigation a decision will be made as to the appropriate action and learning.

In order to maintain confidentiality and in keeping with our legal obligations, it may not always be possible to give you (the whistleblower) specific details of the investigation or the outcome of any investigation, but you will be informed when the investigation has been completed.

If you raised a genuine concern, we will not take any action against you if the investigator does not uphold the concern.

In all cases, The Girls' Brigade will use the Whistleblowing Register to monitor progress and keep track of any investigation and any actions that need to be taken. The Chief Executive will manage the process and provide accountability.

The Register will be kept updated stating:

- The name and status of the whistleblower
- The date on which The Girls' Brigade received the whistleblower's report of a concern
- The nature of the whistleblowing concern
- Details of the person who received the whistleblowing report
- Whether it is to be investigated and by whom
- The outcome of the investigation
- Learning identified from the incident

- What action or change has been implemented as a result of the incident
- Any recommendations to be considered and by when.

The Register will be confidential and only an anonymised version will be made available for inspection by the Board of Trustees.

The Chief Executive will report to the Board of Trustees on the operation of the Whistleblowing Policy and any allegations made during the period covered by the report. The identity of the whistleblower will remain confidential in any report for the Board.

12.4.3 Confidentiality and anonymity

All whistleblowing matters will be treated in confidence. The Girls' Brigade will not reveal your identity other than to the Chief Executive and the nominated investigator.

There may be circumstances when The Girls' Brigade will be required to identify you:

- Where there is a duty to refer to statutory agencies
- Where the matter results in court proceedings and you are required to give evidence
- Where it is required in order to progress an investigation
- If the matter is subsequently handled under a different process (e.g. complaints/safeguarding procedure).

Every effort will be taken by The Girls' Brigade to notify you if the above becomes applicable.

We hope that volunteers will feel able to voice whistleblowing concerns openly under this policy.

However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage anonymous disclosures. However, if you have a serious concern, it is better for us to be informed anonymously than not at all. However, to enable a thorough investigation and to be able to substantiate any claims, it is always preferable for you to supply your details.

Any request for anonymity will be considered at the discretion of the Chief Executive. In exercising this discretion, the following will be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation, and
- Whether the allegation can realistically be investigated from factors or sources other than the whistleblower.

12.4.4 Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes concerned about possible repercussions. The Girls' Brigade encourages openness and will support volunteers who raise genuine concerns under this policy, even if they turn out to be mistaken and no wrongdoing is found.

This policy is in line with the Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998. The Act gives employees raising whistleblowing concerns legal protection from negative treatment as a result of raising a concern. Under the law, volunteers are not afforded the same legal protection as employees. However, The Girls' Brigade want to promote and encourage an open and honest environment where concerns can be freely raised.

We will treat all individuals making a genuine whistleblowing concern in the spirit of the Public Interest Disclosure Act 1998.

Volunteers will not suffer any detrimental treatment as a result of raising a genuine whistleblowing concern. Detrimental treatment includes termination of your volunteering role, threats or other unfavourable treatment connected with raising a concern.

If an individual experiences any such unfavourable treatment from volunteers, staff or any members of The Girls' Brigade, this must be reported to the investigator immediately.

Staff and other volunteers must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct may be subject to action.

The Girls' Brigade will take all reasonable steps to protect whistleblowers from any negative or unfavourable treatment as a result of their report and support them throughout any investigation. We treat all concerns consistently, fairly and professionally.

Those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will not be protected under this policy.

12.4.5 Appeals

We will try to deal with your concerns fairly and in an appropriate way, but we cannot always guarantee the outcome you are seeking. If at the conclusion of an investigation under this whistleblowing process, you are not satisfied with the outcome you may appeal the decision.

You have grounds for appeal if you believe that the correct process has not been followed or you have new information that you wish to be considered.

In these circumstances, you may appeal to the Chief Executive within 30 days of being notified of the outcome by contacting the Support Centre at gbc@gb-ministries.org.

The purpose of the appeal is to review the outcome of the original investigation and basis upon which the original decision was made. The decision of the Chief Executive is final.

12.5 Further information & contacts

The independent whistleblowing charity, Protect, operates a confidential helpline, 020 3117 2520, and can be contacted via its [website](#).

Charity Commission: 0300 065 2199

13 DIGNITY IN GB - ANTI-BULLYING, HARASSMENT AND SEXUAL HARASSMENT POLICY

13.1 Policy statement

The Girls' Brigade is committed to providing a supportive environment where everyone is treated with dignity, respect and courtesy at all times. Our Dignity at Work policy expresses our commitment to support and maintain a workplace that is free from bullying, harassment and sexual harassment so staff feel safe and happy.

Bullying, harassment or sexual harassment will not be tolerated. We have a duty of care to protect all staff, volunteers and members, and any allegations of bullying and harassment will be taken seriously and will be fully investigated in a fair, independent and confidential way. Volunteers and staff will be supported and will be encouraged to try to resolve any issues as early as possible.

Any behaviour that could potentially undermine someone's dignity and respect should be regarded as unacceptable. If it is not challenged, then it is likely to escalate and lead to significant difficulties for all concerned.

All staff and volunteers have a responsibility to ensure that they treat everyone with dignity and respect. Team Leaders, in particular, have a responsibility of ensuring that they uphold these principles and set an example for their groups. Any reported incidents of bullying or harassment will be taken seriously and dealt with promptly, in accordance with The Girls' Brigade guidelines.

13.2 Defining Bullying, Harassment and Sexual Harassment

Unacceptable behaviour becomes bullying or harassing behaviour when it causes actual harm or distress to the target(s) normally after a series of incidents over a period of time.

The terms bullying and harassment are used interchangeably and there are many definitions. Bullying or harassment can take place face-to-face, behind the person's back, by telephone, email, text, social media or any other form of communication.

Bullying may be characterised as: Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient. It can lead to fear, isolation and demotivation.

Harassment is defined as: Unwanted conduct which has the purpose or effect of violating another person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. It may be related to age, sexual orientation, gender, gender reassignment, race, disability, religion and belief, pregnancy and maternity, marital status, or any personal characteristic of the individual, and may be persistent or an isolated incident.

Sexual Harassment is defined as: Unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated. The conduct does not need to be sexually motivated; it only needs to be sexual in nature. For example, it includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

The Girls' Brigade will also extend the reasonable steps to prevent sexual harassment of employees to volunteers too.

Examples of bullying and harassment

It is not possible to create an exhaustive list, but some examples include:

- Behaviour on more than one occasion which is offensive, abusive, malicious, insulting or intimidating
- The use of suggestive or derogatory remarks, jokes or other verbal abuse at an individual's expense
- Spreading malicious rumours or insulting someone by word or behaviour
- Picking on people or setting them up to fail
- Exclusion or victimisation
- Unfair treatment
- Overbearing supervision or other misuse of power or position
- Unwelcome sexual advances – touching, standing too close, the display or sending of offensive materials
- Deliberately undermining a competent worker by overloading and constant criticism on more than one occasion
- Punishment imposed without reasonable justification
- Intrusive questions about a person's private or sex life or a person discussing their own sex life
- Comments on appearance, age, private life.

13.3 Guidelines for all volunteers

- All volunteers must:
- Ensure that other volunteers, children, young people, parents and carers are aware that bullying, harassment and sexual harassment will not be tolerated
- Ensure that all members are treated with dignity and respect in line with our Equality Diversity & Inclusion Policy in [section 6](#)
- Reduce the scope for online bullying and inappropriate comments through adherence to the IT and Social Media Policy in [section 9](#)
- Encourage the view that reporting incidents of bullying is taking responsible action, rather than 'telling tales'
- Ensure that reported incidents are dealt with in line with the procedures in section 13.4 below
- Ensure that everyone involved in the situation has access to pastoral support
- Direct the disapproval at the behaviour not at the child/young person/leader
- Talk to the whole group about bullying and harassment, and the importance of The Girls' Brigade being a safe and supportive place for everyone to be
- Encourage the children, young people and adults in their care for one another.

13.4 Procedures

Report all incidents of bullying, harassment or sexual harassment within 5 working days to:

- the Support Centre at gbcg@gb-ministries.org,
- the group leader or the district team leader. If the group leader or the district team leader are potentially involved in the incidents, do not contact them – just contact the Support Centre as mentioned above.

It is possible to follow either the informal or formal route when making a complaint of bullying or harassment.

Informal route

Where possible and if appropriate, GB encourages volunteers to try to resolve problems related to bullying or harassment informally before using the formal process. This can be done with the support and help of the group leader or the district team leader. It is important to remember that the other person may be unaware of their behaviour and the impact it has. Informal feedback will give

the person a better understanding and opportunity to change or stop their behaviour quickly.

Formal route

If an informal approach does not resolve matters, or the situation is too serious to be dealt with informally, then a formal complaint may be made by using GB's bullying and harassment procedure, as set out below. This will involve setting out the details of the complaint in writing with specifics on dates and occasions, and an account of what the bullying or harassment is alleged to consist of. A meeting will then be arranged in accordance with the Complaints Procedure in [section 14](#).

It's also the responsibility of all employees to report any harassment or bullying that they're aware of within the workplace to the Chief Executive or to the Chair of The Girls' Brigade Trustee Board. A clear protocol for how to deal with cases of alleged harassment or bullying in the workplace is outlined in the Staff Handbook.

14 COMPLAINTS PROCEDURE

14.1 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 GB volunteers seek to do their best for the members of the group(s), occasionally leaders, members, parents/carers or church members may question the actions that they have taken. In such circumstances, a complaint can be made and any allegations or concerns will be taken seriously, dealt with promptly and with fairness and equality.

Complaints can be made about many different things, but they always follow the same process to investigate and resolve as set out below.

14.2 Guidelines

If the allegation relates to a district or national event then the complaint should be made to the GB Support Centre on gbco@gb-ministries.org. The complaint will be acknowledged, and initial contact will be made with the complainant within 5 working days.

An independent person will be nominated to investigate, write an investigation report, and make recommendations. The GB CEO will review the investigation report and issue an outcome letter. If the CEO is named in the complaint, the Deputy Chair of the Board or the Board Chair will review the report and issue the outcome letter. The outcome letter sets out whether the complaint is upheld, partially upheld, or not founded and any recommendations and actions. The timescale for the completion of the investigation, the production of the investigation report and the outcome letter can vary depending on factors like the availability of key people to meet with the investigator. However, the investigation will normally be completed within a month of the date of the complaint.

An appeal can be made against the outcome by the complainant or the person who the complaint is about by contacting gbco@gb-ministries.org within 14 working days of receiving the outcome letter. The appeal will be heard by an independent person who has not been involved in the previous stage. The independent person hearing the appeal will write an outcome letter setting out whether the appeal is upheld or not and the rationale for the outcome. There can be no further appeals – this outcome is final.

A lessons learnt exercise will take place after a complaint process has been completed to identify how best to prevent similar

situations occurring in the future.

If a parent/member/child/young person or church member makes an allegation against a Girls' Brigade volunteer or group, it's important to address this without delay (and acknowledge the complaints within 5 working days).

As can be seen from the flow chart below, there are two routes for resolution of complaints – informal and informal.

The informal complaints process is:

- Report the allegation to the team leader in charge of the event/group. If the allegation is against the team leader, then report the issue to the leadership of the local church and the GB Support Centre at gbc@gb-ministries.org.
- There should be no contact between the volunteer and the child or person making the allegation until discussions have taken place and an outcome has been reached.
- If at any point during the informal complaints process, information comes to light that gives cause for concern in relation to safeguarding or potential unlawful activity, refer the matter immediately to the church safeguarding Officer and the Designated Safeguarding Lead at the GB Support Centre. The DSL will liaise with the church safeguarding officer over referrals to the safeguarding process, police and statutory authorities as appropriate.
- Pastoral support should be offered to the complainant as well as the volunteer against whom an allegation has been made.
- Although each set of circumstances will be different, the following is a guide to attempting to resolve the complaint locally:
 - o Obtain a full account of the alleged incident/concern from each person involved using the actual words spoken and not a translation or paraphrase of what was said.
 - o Where verbal accounts are given, ensure these are accurately recorded. Either someone can make notes for the complainant and/or people involved in the complaint and agree it with them. Again, make notes of the words actually used – don't paraphrase. Alternatively, a recording device or platform like Zoom could be used but you must seek the person's consent to recording.
 - o Seek a meeting of those involved with the chaplain of GB team or an impartial chairperson, to openly discuss the issues and look for resolution
 - o Attempt to resolve the problem by mutual agreement.
- If local resolution has been achieved, document the process/outcomes for future reference, identify lessons to be learnt for the future, and plan a follow-up to review any changes made.
- If local resolution through informal processes has not been achieved, inform the church and the GB Support Centre. The matter

will then be referred to the formal complaints process.

The timescale for the completion of the informal complaints process can vary depending on availability of key people to meet together to try to resolve the situation. However, the meeting to try to reach resolution will normally take place within two weeks of the date of the complaint.

The formal complaints process is:

- Report the allegation to the team leader in charge of the event/group. If the allegation is against the team leader, then report the issue to the leadership of the local church and the GB Support Centre at gbco@gb-ministries.org.
- If the complaint is being looked at formally following an unsuccessful attempt at local resolution (the informal route), you will be informed by either the Church or the GB Support Centre about an independent person who will investigate the complaint and what the next steps are.
- There should be no contact between the volunteer and the child or person making the allegation until discussions have taken place and an outcome has been reached.
- Pastoral support should be offered to the complainant as well as the volunteer against whom an allegation has been made.
- If at any point during the informal complaints process, information comes to light that gives cause for concern in relation to safeguarding or potential unlawful activity, refer the matter immediately to the Church Safeguarding Officer and the GB Support Centre. The DSL will liaise with the church safeguarding officer over referrals to the safeguarding process, police and statutory authorities as appropriate.
- Although the circumstances will be different, the process to be followed is:
 - o Either the Church or the GB Support Centre will allocate an independent person who will obtain a full account of the alleged incident/concern from each person involved, will write a report, and make recommendations.
 - o The independent investigator will be someone experienced in investigating complaints and taking statements and making recommendations. It might be a member of staff or a trustee from GB or might be a member of the governing body of the church.
 - o Pastoral support will be offered to everyone affected by the complaint
 - o The independent investigator will contact the complainant, anyone named in the complaint, and any potential witnesses to arrange 1:1 discussions with the relevant parties.
 - o Where verbal accounts are given, the investigator will ensure these are accurately recorded – capturing the words actually used and will not paraphrase. The investigator may choose to use a recording device or platform like Zoom (and will seek

- the person's consent to recording).
- o The church and the GB Support Centre will identify a senior independent person to review the investigation report and issue an outcome letter which sets out the investigation process, whether the complaint is upheld, partially upheld, or not founded and any recommendations, lessons learnt, and actions.

The timescale for the completion of the investigation, the production of the investigation report and the outcome letter can vary depending on factors like the availability of key people to meet with the investigator. However, the investigation will normally be completed within a month of the date of the complaint.

An appeal can be made against the outcome by the complainant or the person who the complaint is about by contacting gbc@gb-ministries.org within 14 working days of receiving the outcome letter. The appeal will be heard by an independent person who has not been involved in the previous stage(s). The independent person hearing the appeal will write an outcome letter setting out whether the appeal is upheld or not and the rationale for the outcome. There can be no further appeals – this outcome is final.

A lessons learnt exercise will take place after a complaint process has been completed to identify how best to prevent similar situations occurring in the future.

Please note:

- o Full written records should be maintained about all processes followed and retained in line with the retention schedule set out in the Data Protection Policy in [section 8](#). You may wish to use the [Responding to complaints template](#).
- o The investigation is to be completed within 40 working days (eight weeks) and the results of the investigation sent in written format to the complainant.

APPENDIX A: ADDITIONAL POLICIES, 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 the GB Support Centre, or accessed for download via the GB website.

TITLE	PURPOSE AND LOCATION
POLICIES AND REGULATORY DOCUMENTS	
The Girls' Brigade England and Wales Website Privacy Policy	Sets out when, how and why The Girls' Brigade uses and protects any information that you give us.
Subject Access Request Policy	Outlines the procedure The Girls' Brigade must follow upon receipt of a SAR
Appropriate Policy Document	Demonstrates that our processing of Special Category and Criminal Offence data is compliant with the requirements GDPR Article 5 principles
Legitimate Interests Assessment Document	Documents our assessment of whether GBM's processing activities are necessary and proportionate, considering the rights and freedoms of the individuals concerned
FORMS	
Volunteer Registration Form	Registration form for those seeking to be adult volunteers in GB
Self Declaration Form	Form confirming conviction history of volunteers and potential volunteers
GB Joining Form	To be completed by parents/carers giving contact/health/medical details and consent for photographs.
Residential Events Health Consent Form	Used by those taking young people on a residential.
Residential Events Registration Form	To be completed at least six weeks prior to a Residential Event.
Hazardous Activity Form	Used to register all hazardous activities.

TITLE	PURPOSE AND LOCATION
FORMS	
Small Bus Permit Application Form	To be completed by those requiring a small bus permit. A small bus permit is required for those who hire or own a minibus to transport their members.
Sleepover Registration Form	To be completed at least six weeks prior to a sleepover and includes sleepover guidelines.
GUIDELINES AND TOOLKITS	
Residential Events Toolkit	Free download from the resources section – includes model risk assessment.
Residential Events Handbook	Free download from the resources section - to be referred to as part of Residential Events training.
Delivering an Evening's Programme	Free download from the resources section – includes good practice and model risk assessments.
TEMPLATES	
Responding to complaints template	A useful template for you to complete if necessary
Reporting concerns about a child/person's safety/welfare or they disclose abuse template	A useful template for you to complete if necessary
Character reference request template	A useful template for you to complete if necessary

APPENDIX B: UNDERSTANDING AND AWARENESS OF POTENTIAL ABUSE

1 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, child-on-child contextual abuse and forced marriage. Note: contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm beyond their families. It recognizes that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.

In some cases, more than one type of abuse may be present at the same time.

2 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.

APPENDIX C: GLOSSARY OF LGBTQ+ TERMS

Here is a glossary of commonly used LGBTQ+ terms. These definitions aim to promote understanding and inclusivity.

General Terms

LGBTQ+: Acronym for Lesbian, Gay, Bisexual, Transgender, and Queer (or Questioning). The “+” acknowledges the diversity of identities beyond these five.

Ally: A person who supports and advocates for LGBTQ+ individuals, even if they don’t identify as part of the community themselves.

Coming out: The process of recognising, accepting, and sharing one’s LGBTQ+ identity with others.

Sexual Orientation

Asexual: A person who experiences little or no sexual attraction to others.

Bisexual (Bi): A person attracted to more than one gender.

Gay: A person, typically a man, who is romantically or sexually attracted to other men; sometimes used as an umbrella term for homosexuality.

Lesbian: A woman who is romantically or sexually attracted to other women.

Pansexual (Pan): A person who is attracted to people regardless of their gender.

Queer: A broad term for sexual and gender minorities that are not heterosexual or cisgender. While historically used as a slur, many have reclaimed it as a positive identity.

Gender Identity

Cisgender (Cis): A person whose gender identity matches the sex they were assigned at birth.

Genderfluid: A person whose gender identity shifts or changes over time.

Genderqueer: A person who does not subscribe to conventional gender distinctions, often identifying as neither entirely male nor female.

Non-binary: A person whose gender identity does not fit within the binary of male or female.

Transgender (Trans): A person whose gender identity differs from the sex assigned at birth.

Gender Expression

Pronouns: Words used to refer to someone in place of their name. Common examples include “he/him,” “she/her,” and “they/them.”

Transitioning: The process a transgender person may undergo to live as their authentic gender. This can include social (e.g., name, pronouns), medical (e.g., hormones, surgeries), and legal changes.

Other Important Terms

Intersex: A person born with physical sex characteristics (such as chromosomes, hormones, or anatomy) that don’t fit typical definitions of male or female.

Questioning: A person exploring their sexual orientation, gender identity, or both.

This glossary is a starting point for understanding the diverse identities and experiences within the LGBTQ+ community. Always ask individuals how they identify and what terms they prefer.