

Lupine Adventure Co-operative

Lupine Policies

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Lupine Policies formerly formed part of the Lupine Staff Handbook. It was transferred into a stand-alone document as part of the 2021/2022 Staff Handbook update.

Policies

1 Safeguarding Policy (Children and Young People)

The purpose and scope of this policy statement

The purpose of this policy statement is:

- to protect children and young people who receive Lupine adventure Co-operative's services from harm.
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of Lupine Adventure Co-operative including employed staff, freelance staff and volunteers.

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. The Children Act 1989, the Children Act 2004 and the Children and Social Work Act 2017.

Supporting documents

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

- Safeguarding Officer Duties (in the Lupine Procedure Document)
- Our Code of Conduct for activity participants (Stand-alone document)
- Our Safeguarding Code of Conduct for Staff and Volunteers (in the Lupine Staff Handbook)
- Recognising How Children Can Be Harmed (Lupine Policies: Supporting Documentation)
- Possible signs of Abuse (Lupine Policies: Supporting Documentation)
- What is a disclosure? (Lupine Policies: Supporting Documentation)
- Anti-bullying policy (Lupine Policies)
- How to Respond to a Disclosure, Suspicion or Allegation (Lupine Policies)
- Recording concerns and information sharing (Lupine Policies)
- Allegations against Lupine staff and volunteers (Lupine Policies)
- What Happens if you are Accused of an Abusive Action? (Lupine Policies)
- Safer recruitment Policy (Lupine Policies)
- Recruitment of Ex-offenders (Lupine Policies)
- Complaints Policy (Lupine Policies)
- Equal Opportunities Policy (Lupine Policies)
- Whistleblowing Policy (Lupine Policies)
- Health and safety Policy (Lupine Policies)
- Lupine Risk Assessments (in the Lupine Procedure Document)
- Secure Storage, Handling, Use, Retention & Disposal of DBS Disclosures (Lupine Policies)
- Data protection (Lupine Policies)
- Photography and sharing images policy (Lupine Policies)
- Good Practice for adults working with young climbers (Lupine Policies: Supporting Documentation)

Lupine Adventure Co-operative believe that:

- children and young people should never experience abuse of any kind
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

We recognise that:

- the welfare of children is paramount in all the work we do and in all the decisions we take
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare
- all children, regardless of age, disability, gender identity, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

We will seek to keep children and young people safe by:

- valuing, listening to and respecting them
- appointing a nominated child protection lead for children and young people
- adopting child protection and safeguarding best practice through our policies, procedures and Codes of Conduct
- providing effective management for staff and volunteers through supervision, support, information, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- making sure that children, young people and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns
- supporting anyone who in good faith reports his or her concerns that a child under our duty of care is at risk.

1.1 Lupine Adventure Co-operative Anti-Bullying Policy

Lupine adventure Co-operative seeks to prevent bullying from happening between children and young people who take part in our activities; make sure bullying is stopped as soon as possible if it does happen and to provide information to all staff and volunteers as to what we should all do to prevent and deal with bullying.

Separate documents set out:

- Our Code of Conduct for activity participants
- Our Safeguarding Code of Conduct for Staff and Volunteers
- Our policies and procedures for preventing and responding to bullying and harassment that takes place between adults working for/with Lupine.

1.1.1 What is Bullying?

Bullying includes a range of abusive behaviour that is repeated and intended to hurt someone either physically or emotionally.

We recognise that:

- Bullying causes real distress and affects a person's health and development, in some instances, bullying can cause significant harm
- All children, regardless of age, disability, gender identity, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- Everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to bullying

1.1.2 Responding to Bullying

We will make sure our response to incidents of bullying considers:

- The needs of the person being bullied
- The needs of the person displaying bullying behaviour
- Needs of any bystanders
- Our organisation as a whole

All staff members and volunteers for Lupine Adventure Co-operative should be prepared to:

- Take all signs of bullying very seriously
- Listen to all the children involved to establish what has happened. Take action to ensure the victim is safe. Speak with the victim and the bully(ies) separately.
- Reassure the victim that you can be trusted and will help them, but do not promise that you will not tell anyone else.
- Keep records of what is said (e.g. what happened, by whom, when).
- Ask the child/children who have been bullied what they would like to happen next
- Inform parents and carers (unless doing so would put a child at further risk of harm)
- Provide support to the child/children being bullied, children who witnessed the bullying and the child/children who has been accused of bullying
- Consider appropriate sanctions for children that have carried out bullying
- Continue to monitor the situation even if the situation seems resolved
- If it is necessary to ensure safety, remove children from the activity
- Inform the Lupine Adventure Co-operative Safeguarding Officer (unless the allegation is against the Safeguarding Officer (see Allegations against Lupine staff and volunteers below)
- If you think a child is in immediate danger, contact the police on 999 and contact the Duty Manager

1.2 Promoting Good Practice (and avoiding Poor Practice)

Not all safeguarding concerns pertain to direct abuse. Neglect, omission or failing to adhere to Good Practice can all increase the risk of harm to participants in direct and indirect ways. Poor Practice constitutes anything that is contradictory to the Lupine Adventure Co-operative Safeguarding Policy, Safeguarding Code of Conduct and/or any other Lupine procedures and

guidance relevant to Health and Safety. It may look like failure to follow event/activity guidelines; failure to follow emergency procedures, or act in a timely manner so putting children at unnecessary risk. It might also look like unprofessional or unemphatic conduct that reduces participants feeling of safety in raising concerns. A combination of minor incidents could also be regarded as poor practice.

It is the responsibility of all adults working with Lupine to promote, support and encourage Good Practice and to raise concerns if they witness Poor Practice. Significant concerns of Poor Practice on Lupine Activities should be reported to a senior Staff member (that might be the Course Director, Duty Manager, a Management Committee member, or the Lupine Directors – depending on the situation and who you are)

1.3 How to Respond to a Disclosure, Suspicion or Allegation

“If there is a concern about a child’s welfare, or the behaviour of an adult the one thing not to do is do nothing”

If you think a child is in immediate danger, you should contact the police on 999

A child in your care may indicate to you that they are being abused in some way or information may come to you of possible abuse. On receiving this information you should:

Do:

- React calmly - do not rush into inappropriate action. What you are told may be very shocking but it is important you give the child some stability.
- Remember the first priority is safety of the young person. If they require immediate medical attention call an ambulance, inform the medical staff of your concerns and ensure that they are aware that this is a safeguarding issue.
- Research (Baker et al, 2019), found three key interpersonal skills that help a child feel they are being listened to and taken seriously:
 1. **Show you care**, help them open up: Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases such as ‘you’ve shown such courage today’ help.
 2. **Take your time**, slow down: Respect pauses and don’t interrupt the child – let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what’s happened to them.
 3. **Show you understand**, reflect back: Make it clear you’re interested in what the child is telling you. Reflect back what they’ve said to check your understanding – and use their language to show it’s their experience.
- If a child tells you they are experiencing abuse, it’s important to reassure them that they’ve done the right thing in telling you. Make sure they know that abuse is never their fault.
- Take the child seriously and listen carefully to them. Recognise how difficult it was for them to tell you.
- Only ask questions which help to clarify the situation. Do not question any more than is strictly necessary, it may be appropriate to not ask questions
- Try not to make the child repeat their account unnecessarily
- Do not make promises you cannot keep. Explain that you may have to tell other people in order keep them safe, but that you will do your best to keep the incident as confidential as possible.

- Make a full record of what has been said, heard or seen as soon as possible.
- Make sure the information is shared with the right people in a timely manner. Consider the urgency of the information you now have:
 1. If you think a child is in immediate danger, you should contact the police on 999
 2. Many of our event happen outside office hours. If the information feels time-critical or urgent while falling short of 'immediate danger' consider speaking to the Lupine Course Director, The Lupine Duty Manager or the School/Client contact. The Lupine Duty Manager is a first point of call if you need advice on sharing information and will assist you in doing so.
 3. Inform the Lupine Adventure Co-operative Safeguarding Officer as soon as possible (unless the allegation is against the Safeguarding Officer (see Allegations against Lupine staff and volunteers below)

Do not:

- Talk to the alleged perpetrator about the child's disclosure
- Take sole responsibility for further action.
- Ignore what has happened.
- Make promises you cannot keep.

1.4 Recording concerns and information sharing

Timely information sharing is key to safeguarding and promoting the welfare of children. Safeguarding a child is a clear and legitimate reason for sharing information and data protection law does not prevent you from doing this.

Information that is passed on to Lupine Adventure Co-operative, Client Organisations, Social Services and the Police must be as helpful as possible. Hence there is a necessity for making as detailed record as possible.

This should be written and endeavour to contain:

- The nature of the incident.
- A description of any visible injuries.
- The child's account.
- Times, dates or other relevant information.
- A clear distinction between what is fact, hearsay and opinion.

While sharing this information is important, you should also make sure you are not putting a child's safety and welfare at risk by sharing information about them. Always seek consent to share information, if possible. If consent isn't given, you can still share information with relevant professionals under certain circumstances, for example if you are protecting a child from significant harm. In all cases it is important to understand that the welfare of the child and anyone else who may be affected by the situation is paramount. Make sure information is shared securely.

If you are in any doubt or do not feel confident in sharing your concerns with the Lupine Adventure Co-operative Safeguarding Officer, the NSPCC operates a helpline 11am-5pm Monday to Friday on 0808 800 5000 or can be emailed help@NSPCC.org.uk. The NSPCC also has an online abuse report form <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report-report-abuse-online/>

1.5 Allegations against Lupine staff and volunteers

Concerns and allegations about child abuse require very careful handling and should be treated with the strictest confidence. Any form of abuse can ultimately result in a criminal conviction. It is important to keep an open mind and that all allegations are kept in the strictest practical confidence. It is important you act on your concerns. If the concern/allegation is suspected abuse and relates to a Lupine Adventure Co-operative staff member or volunteer then the Lupine Adventure Co-operative Safeguarding Officer staff should be informed as soon as possible. If the allegation is against the Lupine Adventure Co-operative Safeguarding Officer an alternative member of the Lupine Adventure Co-operative Management Committee should be approached. They may in turn refer the matter to Social Services or the Police.

- The member of staff or volunteer will then be notified that an allegation has been made and where appropriate suspended from his/her duties.

If you are in any doubt or do not feel confident in sharing your concerns with Lupine Adventure Co-operative, the NSPCC operates a helpline 11am-5pm Monday to Friday on 0800 800 5000 or can be emailed help@NSPCC.org.uk. The NSPCC also has an online abuse report form <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/report-abuse-online/>

1.6 What Happens if you are Accused of an Abuse, Bullying or Poor Practice?

In the event of Lupine Adventure Co-operative being informed of an allegation of poor practice, bullying or abuse against a person involved in our activities a Management Committee meeting will be called to discuss the issue. They will decide which of these categories the incident falls within and what action is to be taken. If the allegation is about a member of Management Committee the matter will be dealt with by an alternative committee of Directors (not including the accused person).

The person accused may be asked to stand down/suspended pending the outcome of any investigation by either Lupine or the Statutory Authorities. It should be made clear to this person that this is a precautionary measure and will not prejudice any later disciplinary procedure.

Irrespective of the findings of any external criminal and safeguarding enquiries, a disciplinary sub-committee of Directors will assess all individual cases to decide whether a volunteer or member of staff will be reinstated and how this can be handled. The disciplinary sub-committee will need to base its decision on the facts of the case and, where applicable, the findings of any investigation by the Social Service and the outcome of any prosecution by the Police. They also need to consider the reasons any investigating authority has if the matter is not taken further.

Lupine Adventure Co-operative is committed to providing support to an individual where an accusation of abuse has been shown to be false. However, if a Criminal prosecution is dropped, fails or is not pursued the sub-committee may still conclude that on the balance of probability an incident has occurred, and internal disciplinary action is necessary.

The responsibility of the disciplinary sub-committee is to agree the best way forward and to carry out whatever disciplinary measures, risk assessment and mitigations they consider to be appropriate. In this their primary concern will be the welfare and safety of young people.

1.6.1 In the event of an accusation you are advised to:

- Make notes of all your actions/contacts with the child in question as soon as possible.
- Seek access to professional and legal advice.
- Ensure that you are no longer working with the child/children making the allegation.
- Follow the procedures laid out in this and supporting documents.
- Accept that colleagues may not be in a position to discuss the matter with you while the investigation is underway.
- Accept that you may be suspended from working with any young people.

Such events are difficult for all concerned. Lupine Adventure Co-operative will do its utmost to remain impartial in all matters relating to an accusation. The main concern with any incident is the child's welfare. For an individual, against whom an allegation has been made this will be a difficult time. There are no easy ways to deal with such a situation, it is important that you seek help and support.

2 Safeguarding Policy (Adults)

Lupine Adventure Co-operative recognises that everybody has the right to be protected from harm and live in a safe environment. We have a duty of care to safeguard all participants involved in Lupine Adventure Co-operative activities from harm. All participants have the right to protection and the needs of participants from all backgrounds and abilities must be considered. We will ensure the safety and protection of everyone involved in our activities through adherence to our Safeguarding Policy and procedures.

Principles

The following principles underpin the Lupine Adventure Co-operative Safeguarding Policy:

- To provide everyone with appropriate safety and protection whilst they are in our care.
- To allow all staff/volunteers to make informed and confident responses to specific safeguarding issues.
- All suspicions of abuse will be taken seriously and responded to swiftly and appropriately.
- An adult is defined as aged 18 and over.
- That everyone, regardless of age, disability, gender identity, race, religion or belief, sex, or sexual orientation or ability, have the right to live in a safe environment.
- That the welfare of participants is paramount and will underpin all guidance.
- Some adults are vulnerable due need of special care, support, or protection because of age, disability, risk of abuse or neglect.
- extra safeguards may be needed to keep adults who are additionally vulnerable safe from abuse.
- This guidance is mandatory for all staff and volunteers.

Recognising How People Can Be Harmed

Physical Abuse: In a climbing/mountaineering situation this might occur if a person is forced to train or climb beyond his or her capabilities. In more extreme cases this can take the form of physical attack: e.g., hitting, shaking a person.

Emotional Abuse: This might occur if a person is subjected to excessively critical comments, inappropriate tone in speaking about or to someone, or making jokes at a person's expense.

Sexual Abuse: This might occur through making sexually suggestive comments, unnecessary or inappropriate physical contact, or through inappropriate communication before, during or after an event.

Neglect: this includes situations in which a person's basic physical needs (e.g., food, warm clothing) are not met. Neglect can also occur if an instructor fails to ensure participants are safe or exposes them to undue cold or risk of injury.

Domestic Abuse: is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, including between adults who are related to one another. Domestic abuse can include coercive control, physical, emotional or sexual abuse, financial abuse stalking and harassment.

Bullying: is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable. It can involve people of any age, and can happen anywhere – in person or using online platforms and technologies (cyberbullying). This means it can happen at any time. Bullying encompasses a range of behaviours which may be combined and may

include verbal abuse, physical abuse, emotional abuse and/or Cyberbullying/online bullying. Bullying and cyberbullying can be a form of discrimination, particularly if it is based on a person's disability, race, religion or belief, gender identity or sexuality.

Raising Awareness

It is understandable that people who are well motivated, caring individuals with a commitment to outdoor education, are reluctant to believe that a person may be suffering harm in an outdoor environment. It may be difficult to accept that a person could be at risk because of the way an organisation or its events are run. Levels of awareness need to be raised without creating an atmosphere of anxiety or suspicion.

However, our basic principles are:

- If you become aware of anything which causes you to feel uncomfortable, you should speak to the Lupine Adventure Co-operative Safeguarding Officer or another Lupine director.
- If the behaviour gives rise to concern or is directly contrary to accepted good practice then some type of action must be taken.
- Staff members and volunteers should also seek to help and support each other in avoiding situations of bad practice. This is achievable the more open and co-operative a working environment is.
- We will treat everybody who alleges or discloses abuse in a respectful and sensitive manner, and with maximum consideration to their wellbeing.
- We will treat anybody who an allegation has been made against respectfully and fairly in any investigative or disciplinary process.

3 Equal Opportunities Policy

POLICY STATEMENT

The Company recognises that discrimination is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce.

It is the aim of the Company to ensure that no employee or job applicant receives less favourable facilities or treatment on grounds of sex, marital status, disability, race, colour, nationality, ethnic origin, religion, dependents age, sexual orientation, pregnancy and maternity or gender reassignment or are placed at a disadvantage by imposed conditions or requirements which cannot be shown to be justified. The Company wishes to see its workforce broadly reflecting the community in which its premises are based.

Present numbers of staff and applicants for appointments or promotion shall be assessed on the basis of their suitability, capability and qualifications.

This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any Codes of Practice issued by the Commission for Racial Equality, the Equal Opportunities Commission and the Department of Employment, and guidance from the Department of Health, and other statutory bodies.

DEFINITIONS

Where discrimination against any person or group is referred to it shall be deemed to be potential discrimination within any of the categories listed in the policy statement. Two types of discrimination are covered by statute - direct and indirect.

Direct Discrimination

Direct discrimination occurs when a person or group is treated less favourably than others.

Segregating a person or group on the basis of their race, sex or disability is unlawful. It also is unlawful for an employer to discriminate against a job applicant whose conviction is spent.

Indirect Discrimination

Indirect discrimination occurs when a condition or requirement is imposed which, although applied equally to all individuals or groups, is such that:

- the proportion of persons of a group who can comply with it is significantly smaller than the proportion of persons not of that group who can comply with it;
- the Employer cannot show it as being justifiable based upon the needs of the job;
- it is to the detriment of the individuals concerned because they cannot reasonably comply with it.

For example, a dress policy which prevents women wearing trousers discriminates against women of a particular race or religion; a higher language standard than is actually needed to do the job discriminates on the grounds of nationality/race; a training policy which excludes part-time staff may discriminate against women, who fill the majority of part-time jobs.

RIGHTS OF DISABLED PEOPLE

The Company attaches particular importance to the needs of disabled people.

Under the terms of this policy, Lupine are required to:

- make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours.
- include disabled people in training/development programmes;
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

VICTIMISATION AND HARASSMENT

Discrimination by victimisation occurs when a person is treated less favourably than another because he/she had asserted his/her rights under the Acts relating to discrimination or had helped another person to assert those rights.

MANAGERIAL RESPONSIBILITY

The responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Directors. Directors shall ensure that they and their staff operate within the policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each Director will ensure that:

- all their staff are aware of the policy and the arrangements, and the reasons for the policy;
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
- proper records are maintained.

RESPONSIBILITY OF STAFF

Whilst the responsibility for ensuring that there is no unlawful discrimination rests with management, the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- comply with the policy and arrangements.
- not discriminate in their day-to-day activities or induce others to do so;
- not victimise, harass or intimidate other staff or groups on the grounds specified in the policy statement.
- inform their manager if they become aware of any discriminatory practice.

RELATED POLICIES AND ARRANGEMENTS

All employment policies and arrangements have a bearing on equality of opportunity. The Company policies will be reviewed regularly and any discriminatory elements removed.

GRIEVANCES/DISCIPLINE

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Grievance Procedure

Discrimination and victimisation will be treated as disciplinary offences and they will be dealt with under the Disciplinary Procedure.

REVIEW

The policy and arrangements will be reviewed periodically by the Directors.

4 Health & Safety Policy

Policy Statement

It is the Lupine Adventure Co-operative's policy, so far as is reasonably practicable to:

1. provide and maintain equipment and systems of work that are safe and without risks to health,
2. to provide such information, instruction, training and supervision as is necessary to ensure the health and safety at work of employees and clients,
3. to provide such protective equipment as is necessary for the health and safety at work of employees and clients,
4. to encourage staff to set high standards of health and safety by personal example,
5. to encourage staff to challenge unsafe behaviour,
6. to monitor the effectiveness of health and safety provisions within the company,
7. to keep the company Health & Safety Policy under regular review and to duly publish any amendments.

It is a duty under the Health and Safety at Work Act (1974), for everyone engaged in company activities to exercise responsibility and care in the prevention of injury and ill health to themselves and to others who may be affected by acts and omissions at work. No person shall intentionally interfere with, or misuse anything provided by the company in the interests of health, safety or welfare.

Health & Safety Coordinator

The Directors of Lupine Adventure Co-operative will appoint a Health & Safety Coordinator to have overall responsibility for the future development and implementation of this policy.

Written Risk Assessments

Written risk assessments will be prepared for all adventure activities provided by the company. Their purpose is to identify hazards and their associated risks and to identify the control measures necessary to reduce risk of injury to an acceptable level. Risk assessments will be reviewed by Directors on an annual basis or more regularly if deemed necessary

Incident Reporting

Staff of Lupine Adventure Co-operative are expected to report in writing to the Health & Safety Coordinator, any incident that results in an injury (during a Lupine Adventure Co-operative activity) to themselves, a member of the public or a client. Reports should be sent in as soon as is practicable and should contain the date, time, location, identification of injured party and details of how the injury occurred.

Near Miss Reporting

A near miss is an unplanned event that did not result in injury, illness, or damage - but had the potential to do so. Instructors will send a report to the Health & Safety Coordinator as soon as is practicable and should contain the date, time, location and details of the near miss.

Maintenance of Equipment

Lupine Adventure Co-operative will maintain and check all its equipment in accordance with manufacturers instructions and the current industry standards. Use of all equipment will be logged in and out of the designated storage facilities. Instructors are expected to visually check the appearance of all equipment before use, withdraw it from use and to report any damage to the Health and Safety Coordinator.

Personal Protective Equipment (PPE)

Staff of Lupine Adventure Co-operative will wear the appropriate PPE whilst they are working. Staff will lead by example by wearing helmets during rock climbing/ scrambling sessions etc.

Alcohol & Drugs Policy

Employees Staff of Lupine Adventure Co-operative will not report for work or work whilst under the adverse influence of alcohol, illegal drugs or prescription drugs. Failure to abide by this policy will be viewed as gross misconduct and will result in suspension and an investigation by the Directors.

Sickness Policy

Staff of Lupine Adventure Co-operative should not work if adversely affected by illness or injury. Failure to abide by this policy will be viewed as gross misconduct and will result in suspension and an investigation by the Directors.

Staff Professional Qualifications

Only staff, who have the appropriate NGB for an activity or who have been signed off by a technical advisor, as identified in the relevant risk assessments, shall be lead instructors for that activity. All Staff must supply the Human Resources Manager with a copy of their NGB qualifications.

First Aid Qualifications

All deployed staff of Lupine Adventure Co-operative shall have, as a minimum, a valid First Aid (minimum 16 hours) and are responsible for keeping it up to date. Failure to do this may result in ineligibility to work. All Staff must supply the Human Resources officer with a copy of their First Aid Certificates. In the event of a member of staff also being a qualified medical professional the management committee can waive the requirement of a 16-hour first aid certificate. This can only be done if the member of staff can show that they have relevant and recent experience as well as their professional qualification. A note detailing the reasons and duration of the waiver must be kept on file.

Driving safely

A written Risk Assessment on Vehicle use will be maintained and reviewed by Directors annually. Staff driving for work in their own vehicle must ensure that it always complies with the law, is in safe and roadworthy condition and is suitable for its purpose. All staff (employed and freelance) who drive their own vehicle for work must ensure their motor insurance policy includes business use cover for the amount and type of business mileage they undertake.

5 Whistleblowing Policy

Introduction

The Company is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employers' affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, independently of line management. The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

Scope of Policy

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Protection

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person

(see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by any Director.
- If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

Investigating Procedure

The investigating officer should follow these steps:

Full details and clarifications of the complaint should be obtained.

The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.

The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the Directors.

The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.

A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Directors.

The Directors will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.

The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

If appropriate, a copy of the outcomes will be passed to the Company Auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with a Director.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome, the complainant is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.

After the process the management committee will decide if changes need to be made to any of our risk assessments or procedures.

6 Safer recruitment Policy

Lupine Adventure Co-operative is committed to safeguarding and protecting all children, young people and vulnerable Adults by implementing robust safer recruitment practices.

We are committed identifying and rejecting applicants who are unsuitable to work with children and young people, responding to concerns about the suitability of applicants during the recruitment process and responding to concerns about the suitability of employees and volunteers once they have begun their role.

We place safeguarding at the heart of our recruitment. Any person seeking to work with Lupine Adventure Co-operative on activities with children and young people will know early on in the process, through our advertisements, website and recruitment correspondence that we conduct robust background checks.

We are committed to carrying out thorough background checks on all of our Staff (employed and freelance) including a recent Enhanced DBS check or PVG check, checks against the Children's Barred List, taking up references, self-disclosure and ID checks before they work with children or young people.

We are committed to making safeguarding information a key part of our staff induction and encourage and facilitate all our staff in keeping informed and up to date with safeguarding best practice.

Supporting documents

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

- Admin Instructions: HR (internal company document)
- New Freelancer telephone Interview template (internal company document)
- New Freelancer Induction email (internal company document)
- Lupine Policies
- Lupine Procedures
- Lupine Staff Handbooks

7 Recruitment of ex-offenders

As an organisation using the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of trust, Lupine Adventure Co-op complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

Lupine Adventure Co-op is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.

A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all application forms, job adverts and recruitment briefs 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, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within Lupine Adventure Co-op and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.

Unless the nature of the position allows Lupine Adventure Co-op to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in Lupine Adventure Co-op who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

We make every subject of a DBS Disclosure aware of the existence of the DBS Code of Practice and make a copy available on request.

We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences.

8 Secure Storage, Handling , Use, Retention & Disposal of DBS Disclosures

General principles

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

Storage and access

Disclosure information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

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

Retention

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

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

9 Photography and sharing images Policy

- No photographs or video should be taken of young people participating in Lupine Adventure Co-operative activities without the agreement of a parent or guardian.
- No close up/recognizable photograph or video of a young person should be put on any website or used in any print publication without the agreement of a parent or guardian.

10 Data Protection

As an outdoor education company we gather and store a fair amount of data on individuals and organisations in the execution of our business. This page is an attempt to lay out what data we store, why we need it, where we store it, who we share it with and when we delete it.

The Lupine Adventure Co-operative data protection officer is: Andy Godfrey

Individuals and organisations can contact the data protection officer to request a copy of the data that we hold on them and to request corrections are made as well as deletion and cessation of processing of that data. Complaints can also be made to the data protection officer or the Information Commissioners' Office (ICO)

It should be assumed that all PAYE employees of the co-operative have access to all data.

All data that is stored on Microsoft Sharepoint is backed up onto two Network Attached Storage devices and is accessible by, and in some cases synced to, logged in company laptops.

10.1 Individual Clients, enquirers and subscribers to our newsletters

What data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
Email address and name (and details of when newsletters are opened) of subscribers to our newsletters	To be able to send newsletters to subscribers	On the web server	No one	We routinely un-subscribe users whose addresses are bouncing and users may unsubscribe themselves. Un-subscribed user data is deleted every winter.	
Consent form Information (includes medical information) This varies between under 18's and over 18's but can consist of name, address, date of birth, medication,	To ensure we and any instructors working directly with you have contact information and medical	Physical consent forms are scanned in (originals shredded) and stored on Sharepoint. Sometimes consent forms / medical info is collected via	Instructors Medical professionals to assist them in the execution of their duties.	Instructors are obliged to delete information at the end of the event at the latest. We reserve the right to keep the information indefinitely. However, in practice each year we delete	

<p>medical issues, parents contact details, doctors contact details, dietary preferences, Other family and friends contact details. Sometimes rather than using our consent forms we simply take copies of a School's consent forms, these may hold additional information.</p> <p>If we are working under the instruction of a school (i.e. they are responsible for health and safety and we are merely providing one or more staff then we may receive medical information on the day but do not store it at all.</p>	<p>information that we / they may require.</p> <p>To ensure that we are able to consent to emergency medical treatment in the case of under 18's if their parents cannot be contacted.</p> <p>To enable medical staff to release under 18's to our care after treatment.</p>	<p>Google Forms or Microsoft Forms. This information is therefore stored within the company Google drive or Microsoft Sharepoint drive and the data is also saved to an excel spreadsheet which is stored on the Sharepoint drive.</p>	<p>School staff to aid with our collation.</p>	<p>consent forms that we feel we no longer need using the following policy.</p> <p>Adult only courses - consents over 5 years old are deleted.</p> <p>Courses that involved young people as participants - We make an educated guess at the age of the youngest person (scout groups 10, Gold DofE 16, silver Dofe 14 etc. then count the years up to 18 and then add 5. We then delete forms when this period has passed.</p> <p>The reasons that we may keep the information longer than outlined above are twofold.</p> <p>1) The time scales outlined above are estimates and we don't want to delete data when we may still need it. The time required to check each consent form each year is prohibitive so we make educated guesses as to whether we need to keep batches of consent forms, this will result in some consent forms being kept slightly longer than strictly necessary.</p>	
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				<p>2) If we were to have had a medical emergency we may elect to keep consent forms for longer.</p> <p>Data collected in Google and Microsoft Forms format is deleted at the end of each year</p>	
<p>Photos. Photo consent is requested on consent forms.</p>	<p>We take pictures for social media release and for use in our promotions.</p>	<p>Microsoft Sharepoint</p>	<p>Posted on Social Media, used on our website and other promotions.</p>	<p>Not deleted routinely.</p>	
<p>Accident Reports Personal information and details of incidents and near misses on accident reports.</p>	<p>Records need to be kept of first aid incidents and how they were responded to.</p>	<p>Microsoft Sharepoint</p>	<p>Accident reports involving the DofE are shared with the AAP unit of the DofE.</p> <p>The health and safety executive view our accident records but do not take copies.</p> <p>Our insurance company request information regarding accidents.</p>	<p>These are deleted on the same cycle as the consent forms.</p>	
<p>Emails</p>	<p>To organise events, we contact most clients by email.</p>	<p>Microsoft servers, our phones and our laptops.</p>	<p>Employees of the company and freelancers are</p>	<p>Not deleted routinely.</p>	<p>Email is accessed using</p>

Email addresses and personal information contained in emails.			sometimes forwarded relevant information via email.		Microsoft outlook, access is not permitted using other protocols
DofE Green Forms Name, e-dofe number, Date of Birth, location of campsites visited on expedition.	The DofE need to record who has attended courses.	Microsoft Sharepoint	The DofE regional offices and DofE assessors.	Not deleted routinely.	As of 2021 Green forms have been all but discontinued. This remains here for historical reasons
DofE assessor reports Name, e-dofe number, details of their expedition.	If assessor reports are not saved correctly on e-DofE then participants come back to us for copies.	Microsoft Sharepoint	Contents of forms is uploaded onto E-dofe.	Not deleted routinely.	

10.2 Schools and other organisations

What Data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
Schools Database School Name and address, DofE contact, Phone number,	We contact schools to let them know about our services.	Microsoft Sharepoint Hubspot account	No one.	Not routinely deleted.	

email, location of school, date last contacted, brief notes on what contact has been had previously.					
Email list Email address, recipient name. The software also records who has read the emails sent	We have a DofE professionals email list that we email up to 5 times a year.	It is a component of our website.	No one.	Not routinely deleted.	The website has an SSL certificate. People can un-subscribe to individual lists or the whole site. We have a double opt in system but also add people who request to be added via the consent forms.
Emails Email addresses and personal information contained in emails.	To organise events we contact most clients by email.	Emails are stored on Microsoft email servers and our laptops.	Employees of the company and freelancers are sometimes forwarded relevant information via email.	Not deleted routinely.	Email is accessed using Microsoft outlook, access is not permitted using other protocols

10.3 Employees

What Data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
Photos	We take pictures for social media release and for use in our promotions.	Microsoft Sharepoint	Posted on Social Media, used on our website and other promotions.	Not deleted routinely.	
Bank details	To pay wages and expenses.	In the Co-op bank online banking and Quickbooks	The Co-op bank and quickbooks.	Not deleted routinely.	

<p>Emails</p> <p>Email addresses and personal information contained in emails.</p>	<p>To communicate with staff.</p>	<p>Emails are stored on Microsoft email servers our phones and our laptops.</p>	<p>Employees of the company and freelancers are sometimes sent information by group email thus sharing the information and each others email addresses so that all can respond.</p>	<p>Not deleted routinely.</p>	<p>Email is accessed using Microsoft outlook, access is not permitted using other protocols</p>
<p>Details of criminal records</p>	<p>Safeguarding and vetting.</p>	<p>Microsoft Sharepoint</p>	<p>No one.</p>	<p>Deleted when no longer working for the co-operative.</p>	<p>DBS's are not stored but in the event of offenses showing up the information is copied into a file and notes attached detailing if we feel that any of the offences have any bearing on the suitability of the person to work with young people.</p> <p>DBS's that are temporarily stored on our servers while we are processing them may be backed up and theoretically retrievable until that back up file is deleted by the rotation policy. This is unintentional and un-avoidable. All backups are password protected</p>
<p>Qualifications overview and personal details</p> <p>Name, Telephone, email, qualifications held, first aid expiry, DBS Number status</p>	<p>To ensure that we have up-to-date records of qualifications and contact information at a glance.</p>	<p>Microsoft Sharepoint</p> <p>We also use a cloud based</p>	<p>Other members of Lupine staff and school staff as required to carry out duties.</p>	<p>Not routinely deleted.</p>	<p>The excel file is also password protected for a little extra security.</p>

(with a tick box if offences are recorded on it) vehicle insurance expiry, home town, driving license details		database system called Ragic.			
Annual reviews	To identify training needs and check on our performance.	Microsoft Sharepoint	No one.	Not routinely deleted.	
PAYE info National insurance number, tax code, pay amounts, tax and NI paid, Home address, Date of birth	To calculate pay.	Microsoft Sharepoint	HMRC.	Not routinely deleted.	Information is kept within HMRC basic PAYE tools.
Copies of qualifications	To prove that staff have the relevant qualifications.	Microsoft Sharepoint	Clients (on request).	Not routinely deleted.	We only pass on qualifications and do not pass on DBS information or ID such as drivers licenses.
Copies of ID Passport, driving license	To prove that we have ascertained the Identity of staff.	Microsoft Sharepoint	No One.	Not routinely deleted.	If staff have been asked to bring ID to a job but forget then we can pass this on with the consent of the member of staff.
Green Form Data Name and Telephone number	The DofE want contact details of supervisors and assessors on Jobs.	Microsoft Sharepoint	The DofE. Schools will also receive a copy.	Not routinely deleted.	As of 2021 Green forms have been all but discontinued. This remains here for historical reasons

10.4 Freelance outdoor professionals

What Data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
Photos	We take pictures for social media release and for use in our promotions.	Microsoft Sharepoint	Posted on Social Media, used on our website and other promotions.	Not deleted routinely.	
Bank details	To pay invoices.	In the Co-op bank online banking.	The Co-op bank.	Not deleted routinely.	
Emails Email addresses and personal information contained in emails.	To communicate with staff.	Emails are stored on Microsoft email servers and our laptops.	Employees of the company and freelancers are sometimes sent information by group email thus sharing the information and each others email addresses so that all can respond.	Not deleted routinely.	Email is accessed using Microsoft outlook, access is not permitted using other protocols
Details of criminal records.	Safeguarding and vetting.	Microsoft Sharepoint	No one.	Deleted when no longer freelancing for the co-operative.	DBS's are not stored but in the event of offenses showing up the information is copied into a file and notes attached detailing if we feel that any of the offences have any bearing on the suitability of the person to work with young people. DBS's that are temporarily stored on our servers while we are processing them may

					be backed up and theoretically retrievable until that back up file is deleted by the rotation policy. This is un-intentional and unavoidable. All backups are password protected
Qualifications overview and personal details Name, Telephone, email, qualifications held, first aid expiry, DBS number (with a tick box if offences are recorded on it) vehicle insurance expiry, home town, driving license details	To ensure that we have up-to-date records of qualifications and contact information at a glance.	Microsoft Sharepoint We also use a cloud based database system called Ragic.	Names, Phone numbers, email addresses and vehicle insurance status are shared with other staff on jobs (Lupine staff and Freelancers). DBS numbers are sometimes shared with school staff Other personal information is routinely shared.	If a Freelancer retires or is retired without ever working for us this information is deleted on retirement. If a Freelancer has worked for us on their retirement we archive this data to be deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.	The excel file is also password protected for a little extra security.
Reviews of work Brief details of work done, strengths and weaknesses, if we feel that there should be deployment restrictions, etc.	To ensure we place suitable staff on jobs.	Microsoft Sharepoint	No one.	If a Freelancer retires or is retired without ever working for us this information is deleted on retirement. If a Freelancer has worked for us on their retirement we archive this data to be	

				deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.	
Invoices and amounts paid	To ensure we pay the right amount and can show HMRC where our money has gone if requested.	Microsoft Sharepoint	HMRC, quickbooks and our accountant.	Not routinely deleted. We delete invoices after 6 years	
Copies of qualifications	To prove that staff have the relevant qualifications.	Microsoft Sharepoint	Clients (on request).	If a Freelancer retires or is retired without ever working for us this information is deleted on retirement. If a Freelancer has worked for us on their retirement we archive this data to be deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.	We only pass on qualifications and do not pass on DBS information or ID such as drivers licenses.
Copies of ID Passport, driving license	To prove that we have ascertained the identity of staff.	Microsoft Sharepoint	No one.	If a Freelancer retires or is retired without ever working for us this	If staff have been asked to bring ID to a job but forget then we can pass this on with

				<p>information is deleted on retirement.</p> <p>If a Freelancer has worked for us on their retirement we archive this data to be deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.</p>	the consent of the member of staff
<p>Green Form Data Name and Telephone number</p>	The DofE want contact details of supervisors and assessors on Jobs.	Microsoft Sharepoint	The DofE. Schools will receive a copy.	Not routinely deleted.	As of 2021 Green forms have been all but discontinued. This remains here for historical reasons

11 Lupine Adventure Policies: Supporting Documentation

11.1 Recognising How Children Can Be Harmed

Any child or young person can experience abuse or neglect. They may experience harm in a family environment, or in an institution or community setting such as a school or sports club. They may know the person who is abusing them or, more rarely, experience abuse from a stranger. Abuse can happen in person or online, or through a combination of the two. Children can also experience more than one type of abuse, and this can have serious and long-lasting impacts on their lives. Child abuse happens when someone harms a child. It can be physical, sexual or emotional, or involve neglect. Abuse may result from action or inaction by a staff member or volunteer, family member or another young person.

Types of Abuse and Neglect

Neglect: this includes situations in which adults fail to meet a child's basic physical needs (e.g. food, warm clothing). This may involve the lack of medical attention or consistently leaving children alone and unsupervised or monitored. Neglect can also occur if a supervisor fails to ensure children are safe or exposes them to undue cold or risk of injury. This has obvious implications for those taking young people into potentially hostile mountain environments.

Physical Abuse: is to physically hurt or injure children. In a climbing/mountaineering situation this might occur if the child is forced to train or climb beyond his or her capabilities. It may also occur if the training disregards the capacities of the child's immature and growing body. In more extreme cases this can take the form of physical attack i.e. hitting, shaking, burning or biting them.

Emotional Abuse: occurs when a child is not given love, help and encouragement and is constantly derided or ridiculed. It can occur, conversely, if a child is over protected preventing them from socialising. In a sporting/climbing context this may be present in the unrealistic expectations of what a child can achieve by parents, coaches or even fellow climbers. This can also occur in the undermining of a young person through ridicule. This abuse often manifests itself in the form of bullying.

Sexual Abuse: occurs when a child knowingly or unknowingly takes part in an activity which meets the sexual needs of the adult person or persons involved. It could range from sexually suggestive comments to physical sexual activities. Exposing young people to pornography is also a form of sexual abuse. In a sporting/adventure activity context this may take the form of photographing or videoing for the sexual gratification of the viewer.

Child Sexual Exploitation (CSE): Child sexual exploitation (CSE) is a type of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in return for gifts, drugs, money or affection. CSE may include grooming, where young people have been tricked into trusting their abuser and may not understand that they're being abused, believing they're in a loving, consensual relationship.

Problematic or harmful sexual behaviour: Problematic sexual behaviour (PSB) is developmentally inappropriate or socially unexpected sexualised behaviour which doesn't have an overt element of victimisation or abuse. Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people

which is harmful or abusive and includes peer on peer abuse. This is harmful to the children who display it as well as the people it's directed towards.

Domestic Abuse: is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, including between adults who are related to one another. Domestic abuse can include coercive control, physical, emotional or sexual abuse, financial abuse stalking and harassment. Being exposed to domestic abuse in childhood is child abuse. Young people aged 16 or over can also experience domestic abuse in their own relationships.

Bullying: is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable. It can involve people of any age, and can happen anywhere – at home, school or using online platforms and technologies (cyberbullying). This means it can happen at any time. Bullying encompasses a range of behaviours which may be combined and may include verbal abuse, physical abuse, emotional abuse and/or Cyberbullying/online bullying. Bullying and cyberbullying can be a form of discrimination, particularly if it is based on a child's disability, race, religion or belief, gender identity or sexuality.

Child Criminal Exploitation (CCE): is when a child under 18 is manipulated, coerced, or deceived into committing crimes for someone else. CCE can take place online, offline, or both.

11.2 Possible Signs of Abuse

Many of the signs that a child is being abused are the same regardless of the type of abuse. These include a child:

- being afraid of particular places or making excuses to avoid particular people
- knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour
- having angry outbursts or behaving aggressively towards others
- becoming withdrawn or appearing anxious, clingy or depressed
- self-harming or having thoughts about suicide
- showing changes in eating habits or developing eating disorders
- regularly experiencing nightmares or sleep problems
- regularly wetting the bed or soiling their clothes
- running away or regularly going missing from home or care
- not receiving adequate medical attention after injuries.

Other signs might be more typical of specific types of abuse:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to injury.
- An injury of which the explanation seems inconsistent.
- Children who appear hungry
- Children whose clothes are inadequate for the weather conditions
- Becoming increasingly unkempt or dirty.
- Children who are left alone or unsupervised for long periods inappropriate to their age
- Inappropriate sexual awareness or behaviour
- Have older boyfriends or girlfriends
- Be involved in petty crime such as shoplifting
- Have access to drugs and alcohol
- Have new things such as clothes and mobile phones, which they aren't able to easily explain
- Difficulty making friends.

These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents or carers.

Lupine Adventure Co-operative believe that anyone working with children or young people should be aware of these signs and know they have a responsibility to act upon any concerns.

11.3 What is a disclosure?

Disclosure is the process by which children and young people start to share their experiences of abuse with others. This can take place over a long period of time – it is a journey, not one act or action.

Children may disclose directly or indirectly and sometimes they may start sharing details of abuse before they are ready to put their thoughts and feelings in order. Not all disclosures will lead to a formal report of abuse or a case being made or a case being taken to court, but all disclosures should be taken seriously. It takes extraordinary courage for a child to go through the journey of disclosing abuse. It's vital that anyone who works with children and young people undertaking this journey is able to provide them with the support they need.

11.3.1 How disclosure happens

Children and young people may disclose abuse in a variety of ways, including:

- directly– making specific verbal statements about what’s happened to them
- indirectly – making ambiguous verbal statements which suggest something is wrong
- behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)
- non-verbally – writing letters, drawing pictures or trying to communicate in other ways.

Children and young people may not always be aware that they are disclosing abuse through their actions and behaviour.

Sometimes children and young people make partial disclosures of abuse. This means they give some details about what they’ve experienced, but not the whole picture. They may withhold some information because they:

- are afraid they will get in trouble with or upset their family
- want to deflect blame in case of family difficulties as a result of the disclosure
- feel ashamed and/or guilty
- need to protect themselves from having to relive traumatic events.

11.3.2 Barriers to disclosure

There are many reasons why children and young people might find it hard to talk about their experiences of abuse or neglect. They might be reluctant to seek help because they feel they don’t have anyone to turn to for support. They may have sought help in the past and had a negative experience, which makes them unlikely to do so again or they may not have the knowledge or words to describe their experience.

Some children and young people may also:

- blame themselves for the abuse or feel shame or guilt - feelings which can be made worse through the use of ‘victim-blaming’ language or labelling
- experience feelings of isolation
- be afraid of negative reactions from parents, caregivers, peers and professionals
- worry they will be causing trouble and making the situation worse
- be concerned about confidentiality
- feel too embarrassed to talk to an adult about a private or personal problem
- feel that they will not be taken seriously

- lack trust in the people around them (including parents) and in the services provided to help them
- find formal procedures overwhelming
- not know about the support services available to them, or be unable to access these services

Not all children and young people realise they have experienced abuse, for example if they have been groomed.

11.4 Good Practice for adults working with young climbers

Lupine Adventure Co-operative volunteers and staff, particularly those involved in climbing activities, will be working in an environment where a “hands on approach” may sometimes be necessary. Ensure that such contact is kept to the safe minimum, done openly, in response to the child’s needs, and is within the knowledge and consent of the child and their parent/guardian. There may, in extreme circumstances, be situations where reasonable force may be used as restraint i.e. self-defence, preventing risk or injury or damage to property. Please record any such incident and report it immediately to the Lupine Adventure Co-operative member responsible for safeguarding. Below are outlined guidelines, ideas and suggestions that help to create a safe environment for children. They should also help in ensuring that a child or others do not misinterpret the behaviour of adults

- Staff and volunteers must respect the rights, dignity and worth of all. They must also treat everyone with equality.
- Climbing coaches and supervisors should ensure that the welfare of any young climber is paramount and that the activity should be fun.

They should think about:

- Not over-climbing, or over-training, young climbers.
- Young people climb because they enjoy it.
- Motivate young people through positive feedback and constructive criticism.
- Ensure young climbers climb in an environment where inherent risk/objective danger is kept to a minimum and is within accepted guidelines.
- Never allow young climbers to climb when injured.
- Ensure all equipment is appropriate and in good condition.
- It is important when supervising young people to avoid situations where an adult and an individual child are completely unobserved e.g. when climbing at a crag.
- If physical support is required e.g. spotting, support when bouldering, ensure the individual is aware of what is happening and has consented to this physical help. Some parents /carers are becoming increasingly sensitive about this type of help and their views should be respected at all times.
- When supervising young people in a changing area adults should ideally work in pairs. Always check before entering a changing area that everyone is decent. Ideally parents/guardians should take responsibility for their own child in these situations.
- Encourage an open environment, always explain why you are doing something and try to facilitate, as far as is practical, an open and inclusive approach to Lupine Adventure Co-operative activities. People often respond better if they feel they are part of the process.