

Policies & Procedures

2017-2018

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Administering Medicines Policy and Procedure

As part of our inclusive setting the Club will endeavour to meet the needs of children with medical needs whilst balancing the welfare of all other children.

Clear systems are in place to ensure the safety of all children.

Medicines

3.45

Wherever possible, children should receive their prescribed medication at home. This will be decided through discussion with the parent/carer. **Please note the Club will only administer recently prescribed medication. By this we mean medication recommended for the child by a doctor, dentist, nurse or pharmacist.**

Our Club Membership form requests and obtains information on each child's medical needs.

Administering Medicines forms ensure that medicines are prescribed for the named child only and properly administered. The Administering Medicines forms are used as part of Health Care Plans for children with specific medical needs.

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Medicines (both prescribed and non-prescribed) will never be given without the prior written consent of the parent/carer on an Administering Medicines form. Our Club Membership Form also seeks permission for staff to act as a 'proxy parent' and sign any written form of consent required by the hospital authorities, if the delay in gaining a parent signature is considered by the Doctor to endanger a child's life. **Staff are updated on children's medical needs before the child starts and on an ongoing basis.**

The Administering Medicines form includes the reason for medication, frequency/dosage and any other relevant information. When asked to administer medication staff should discuss the request with the parent/carer to determine whether the child is well enough to attend the Club.

Where there is the risk of severe allergic reactions, or where emergency medical situations may arise, staff will ask the parent/carer to complete a Health Care Plan for long term medical care and ensure that appropriate protocols are in place.

A member of staff will be assigned to administer medication along with a second staff member to witness administration and countersign for each time that medicines are administered. They will also be responsible for ensuring that:

1. The medication is properly labelled and safely stored during the session, in its original container with the pharmaceutical label that includes the child's name, the date it was dispensed, the type of medicine and the dosage to be given along with the expiry date.
2. Another member of staff acts as a witness who countersigns the Administering Medicines form, ensuring that that the correct dosage is given
3. All necessary details are recorded on the Administering Medicines form, which is then signed by the parent/carer to acknowledge that the medication has been given

If for any reason a child refuses to take their medication, staff will not attempt to force them to do so against their wishes. If and when such a situation occurs, the Manager/Play Leader and the child's parent/carer will be notified as soon as reasonably practical and this outcome will be recorded on the Administering Medicines form. If there are any changes in relation to the type of medication, dosage or any

other changes to the information given on the Administering Medicines form, an update must be made on the form.

Where children are able to administer their own medication, e.g. asthma inhalers, it is essential that staff gain parental consent on the Administering Medicines form and written instructions given so that staff are aware of the situation. Inhalers and epi-pens should always be labelled with the child's name and the date of expiry. Parents/carer are responsible for ensuring that a child's medication is in date and available to us whilst the child is in our care.

A very high percentage of Club staff are qualified Paediatric First Aiders and there is always a Paediatric First Aider onsite. However, if a child needs medication requiring medical or technical knowledge or training staff must receive training to provide the best of medical care.

In some cases, the Manager may request that a Healthcare professional carry out staff training. This training must be given at the earliest opportunity. If staff are not trained, it may not be possible for the child to attend straight away. If appropriate, the parent/carer is welcome to visit the Club to carry out the procedure until training is gained. This is to both protect the child and meet their needs appropriately.

Staff Medication

Staff taking medication should inform their Manager. They should also seek medical advice to ensure that they are in a fit state to care for children properly.

Staff medication should ideally not be held on the premises if not needed. Any medicines being held on the premises shall be locked away securely and out of the reach of children at all times.

Admissions

As an Ofsted Registered provider, we are able to accept the childcare element of the Working Tax Credit system. **Our Ofsted registration number can be found on our paperwork and website.**

The Club will accept children between the ages of 4-11 years in Infant & Primary education. (Reception to Year 6 inclusive). *Any other requests are to be made to the Owner/Manager.*

Membership

When a parent/carer contacts us enquiring about a place for their child, they will be provided with information about admissions, fees and procedures.

Members will receive a Welcome Pack containing a Parent/Carer Information Booklet, Membership and Booking forms. The information given includes details of the Club's Admissions, Payments and Fees along with Policies and Procedures. A current Holiday Club programme and newsletter may also be available. Parents/Carers shall be informed of whether there is a place available for their child as soon as possible. *Links to the relevant booklets/Information will be given.*

The child and their parent/carer will be invited to visit the Club and speak to members of staff. If the parent/carer agrees to abide by all the terms and conditions of admission, including the fees and arrangements for payment, they will be asked to complete and sign the Membership form and other documentation to confirm.

Booking Places

Ways to book (depending on the type of child care you need):

- Use an **Allocated Places form** to book a permanent term time place. *(online / at Club)*
- Use a **Monthly Adhoc booking form** for booking any pattern of term time sessions. *(online / at club)*
- Use a **Holiday Club booking form** to book any school holiday dates. *(online / at club).*

The Club will aim to meet the requirements of our parents/carers and be flexible wherever possible.

However, to help us to plan in advance it is vital that parents/carers notify the Club in advance about the places needed. Children who have not been booked in will not be able to attend the Club and will remain in the care of the parents/carers or School. The relevant booking forms must always be used.

- As the Club Yahoo email account is not checked everyday parents/carers should book for last minute places by phoning Mrs Sian Pumford (Manager) on 07531 344 549. An answerphone directing parents/carers to other available staff will be given.
- Please state if it is an urgent matter and leave your number. It may then be possible for a staff member to contact you before 3:15pm.

Holiday Club is open to all, as well as on Broadway Infant School Inset days. Current holiday programmes and booking forms can be found on our website www.wildaboutplayridgewood.co.uk.

Fees

The current Club fee structure is displayed on our website

Please note that fees will most certainly rise on an annual basis.

After School Club: £7.99 (Collection from Broadway & the Ridge)
After School Club: £8.99 (Collection from Abbotswood, Wellesley, St Mary's and Rangeworthy)
Holiday Club Half Day: £13.75 (8am-1pm) (Open to all)
Holiday Club Half Day: £13.75 (1pm-6pm) (Open to all)
Holiday Club Full Day: £21.95 (8am-6pm) (Open to all)
Flexible school day fees etc available on request to the Manager

The level of fees shall be set by the Manager and reviewed on at least an annual basis. Parents/carers shall be informed in advance of a planned fee increase. Current fees are available at the Club near the desk area, on the relevant booking forms and can also be found on our website www.wildaboutplayrdgewood.co.uk.

Late collection of children will be charged at £10. And again for every fifteen minutes or part thereof.

We may be able to offer more flexible arrangements so please feel free to talk to the Manager or Play Leader in charge. Fees are payable in advance. #

Invoices/statements shall be given out via email initially but also out in book bags, available at the desk or sent via post *if so requested by a parent/carer.*

Payment Policy

All payments should be made in advance of care commencing and by the due date on your invoice.

The Club accepts childcare vouchers.

We charge for full After School Club sessions and do not usually offer a set hourly rate, although your child can arrive and leave at times convenient to yourself.

Ways to Pay

- We insist that payment in made in advance by bacs or childcare vouchers for an Allocated (term time) place. Please check with a member of staff to see which voucher schemes we are registered with. Our account details are available at the Club, near the desk area if you wish to register with the relevant vouchers schemes.
- For all care - Allocated, Ad-hoc (term time) places and Holiday Club sessions please note that we do not accept cheques. However, the correct amount of cash only can be taken by staff at the Club. You will need to make the payment by the due date on your invoice or immediately in the case of last minute care.
- If you are transferring money electronically (BACS) to our account please add a reference - your child's initial and surname *or the invoice number.*

Parents/carers are encouraged to speak to the Manager or Play Leader reason, they are likely to have a difficulty in making a payment on time.

Parents/carers are strongly advised to arrange a meeting at the earliest possible opportunity, to avoid jeopardising their child's place at the Club.

If fees are paid persistently late or not at all with no explanation, the matter will be investigated and a different payment plans discussed.

Continued late payment may result in a formal warning being issued to the parent/carer and they will be informed that continued late payment will result in their child's place at the Club being forfeited.

If all options have been explored and the fees are not paid the Club may be forced to terminate the child's place and seek payment through the small claims court.

Payment Information:

- All Allocated Places (a term time place) must be paid for in advance. The usual method of payment is by bacs, payable on the 29th/30th of the month prior to the booking for the next month. Monthly invoices for allocated places will be issued (sent by email in PDF format) by the 15th of each month.
- The only exception to this will be payment by Childcare Vouchers.
- **For allocated places booked after August, the initial payment must be by cash or Childcare Vouchers, followed by regular payments as above.**
- For holiday bookings the Club requires payment in advance with the booking form otherwise your place/s will not be guaranteed. This policy also applies to childcare vouchers.

Non Payment & Termination of Membership

If the above methods of payment cause you difficulties, please speak to the Manager or Bookkeeper who will discuss alternative methods of payment and present them to the Management Committee for approval.

Fees continue to be payable if a child is ill or absent for any reason. Refunds will only be considered in exceptional circumstances.

If payments are not received in advance by 29th/30th of the month, the matter will be brought to the attention of the Management Committee who may suspend the offer of a place until payment in full has been received.

Cancellations and Amendments to Term time Places

- Four weeks' paid notice is required to cancel a term time booking. A Cancellation form must be completed for this and payment must be made regardless of whether your child attends. An Amendments form can be used to add, swap or drop a term time session.

Arrivals and Departures Procedure

The Club staff will give a warm and friendly welcome to each parent and child on arrival and ensure that they depart safely at the end of each session. The time of arrival and collection shall always be recorded and children's safety shall be safeguarded at all times.

Arrivals

At school children shall be collected from their designated registration points for after school sessions. At each school the register shall be taken by a member of staff who shall sign each child in and add their time of arrival. Once all children are accounted for staff shall escort the children to the Club.

For Holiday Club days **parents must sign their child in and out** by adding the time and a signature in the appropriate columns.

Before the start of each session the Club's rooms will have been prepared for the children's arrival and all daily health and safety checks completed.

Departures

Parents and carers are expected to sign children out by adding the time of **collection** and signing beside this on the register. Staff members only will control the main entrance door and will let all visitors, parents and children in and out.

The door will be securely locked on departure by the staff team.

- If a child is to be collected by someone other than those named on the Membership form, this must be indicated to a member of staff prior to the start of the session and recorded by the Club. **Ideally the adult nominated to collect a child must be one of those names on the Membership form.** Only adults aged 18 years and over and with a password or fitting the parent's description will be authorised to collect children. The club reserves the right to refuse to release a child if they have concerns that the adult collecting them is not suitable to do so.

- In the event that someone else should arrive to collect a child without prior knowledge being given to the Club, the Club will telephone the parent/carer immediately and not release the child without their consent to do so.

- **If the parent/carer or designated adult is going to be late in picking up their child they must call to inform the Club at the earliest opportunity.** If the Club is not informed, then the Uncollected Child Procedure will be activated. Please also note that a **late fee** applies as stated in the Payments Policy under 'Fees'.

Permission and arrangements for children aged eight years and over leaving the Club alone at the end of a session will be a matter for discussion between the Manager/Play Leader, based on the understanding of a child's age, maturity and previous experience.

Written consent for children leaving the Club alone must be submitted to the Club before such arrangements are able to commence.

Finally, please note that no child under the age of 8 will be allowed to leave the Club unaccompanied.

Absences

- If a child is going to be absent from a session, parents/carers must contact the club in advance. Any booked sessions for an Allocated, Ad-hoc or Holiday Club place shall still be charged for.
- It is important that parents/carers contact the Club as well as the school when reporting absences. If not, staff will need to follow the Missing Child procedure if they cannot ascertain why the child has not arrived for after school club and this may result in the police being contacted.
- In the event of an emergency parents/carers can phone the Manager Sian on 07531 344 549.
- Regular absences from the Club could be an early sign and/or symptom that a child or family may be encountering some difficulties and might need support from the relevant statutory agencies. The Club staff will always try to discover the causes of prolonged and unexplained absences and where necessary complete CAF forms.

CAF is the Common Assessment Framework. This is an assessment tool used by Locality Teams to coordinate multidisciplinary integrated support for children and young people with additional needs and their families. It can help practitioners develop an understanding of a child's needs so that they can be met more effectively.

Staff and Visitors

All staff must sign in when they arrive at Club, noting the actual time of arrival and signing beside this. Staff must also make sure they note the actual time when they leave.

All visitors to the Club will be required to sign in to the Visitors book, held within the Club.

The following information will be logged:

- Date
- Full name of visitor
- Where they are from/reason for visit
- Time in
- Time out
- ID checked if applicable

Behaviour Management Policy and Procedure

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The Club's Behaviour Policy is based on the twin aims of managing and improving behaviour in an appropriate way whilst safeguarding the health and welfare of others. The Club recognises the importance of positive and effective behaviour management strategies in promoting children's welfare, learning and enjoyment.

By registering with the Club, parents/carers have accepted the conditions of the Incident Procedure and agreed to work in partnership with staff to eliminate any unwanted behaviour that their child may display. An Individual Behaviour Plan may need to be drawn up by staff, parents and other carers for children requiring extra assistance in managing their own behaviour.

The child-focused aims of our Behaviour Management policy are to help all children to:

- Develop a sense of caring and respect for one another
- Build caring and co-operative relationships with other children and adults
- Develop a range of social skills and help them to learn what constitutes as acceptable behaviour
- Develop confidence, self-discipline and self-esteem in an atmosphere of mutual respect and encouragement

Behaviour Management Strategies

The Club's team of staff will receive training on how to manage behaviour according to clear, consistent and positive strategies. Parents/carers are encouraged to contribute to these strategies, raising any concerns or suggestions.

3.52

Under no circumstances will staff or any other person working on the premises, be allowed to give corporal punishment to any child.

Our Club will take reasonable steps to ensure that corporal punishment is not given to a child by any person who cares for or is in regular contact with them. Significant accidents or injuries that happen outside of the setting will be logged and parents/carers asked to sign.

Behaviour Management at the Club will be structured around the following principles:

- Staff and children will work together to establish a clear set of 'Ground Rules' governing all behaviour. These will be periodically reviewed so that new children have a say in how the rules of the Club operate. Parents/carers will also have access to the Club's 'Ground Rules' to encourage unity and consistency
- 'Ground Rules' will apply equally to all children, staff and parents/carers
- The Club's 'Ground Rules' will be put on display in view of the children, staff and parents/carers
- Positive behaviour will be reinforced with praise and encouragement
- Challenging behaviour will be addressed in a calm but assertive manner. In the first instance, staff will try to re-direct children's energies by offering them alternative and positive options.
- Staff will be open in stating and explaining non-negotiable issues
- When dealing with challenging behaviour, staff will always communicate in a clear, calm and positive manner. For those children who need support in order to behave in an appropriate manner, staff will investigate strategies and offer consistent care whilst at Club.

reflect upon the triggers and effects for some children who find some aspects of the play environment stressful.

In the event that unacceptable behaviour persists, more serious actions may have to be taken, in accordance with the Incident Procedure. At all times children will have explained to them the potential consequences of their actions.

It is recognised that an incident of unacceptable behaviour is a stressful situation for staff and children alike. However, staff will be aware that there is also a need to be mindful of confidentiality and will only discuss such incidents on a 'need to know' basis. Where causes of incidents suggest possible abuse, Safeguarding/Child Protection procedures will be followed.

Incident Procedure

In line with our Behaviour Management Policy and Procedure, the Club has some 'Ground Rules' which the children will be expected to follow. These have been set up for the safety, well-being and happiness of all the children who use the Club. The 'Ground Rules' are linked to this Incident Procedure which provides sanctions relevant to the type of behaviour.

By registering with the Club, parents have accepted the conditions of the Incident Procedure.

Procedure

Parents/carers will be made aware of unacceptable behaviour so they can be involved in the management of their child's behaviour. If an incident occurs then the parent/carer shall be asked to sign an Incident form. Incidents of unacceptable behavior displayed by parents can also be recorded on an Incident form along with other incidents such as the Missing child procedure being followed due to a parent/carer not informing us of their child's non-attendance.

Minor disturbances related to children

These will be dealt with, on the spot by the Manager, Play Leader and Play Assistants.

If there is any recurrence of minor trouble (e.g. cheekiness, disobedience, arguments with other children) then a staff member shall complete a Behaviour Form, inform the parent/carer, request a signature and issue a letter stating the next course of action

If a child receives three entries in the Behaviour Book the parent/carer shall be given a letter highlighting the previous incidents and written warnings. They shall also be informed that the three incidents have resulted in the child being temporarily excluded from the Club for a session. The date of exclusion shall be stated in this letter.

The parent and child will be invited in to a formal meeting with the Manager where the Manager will offer support to the parent in managing and improving the child's behaviour.

The parent/guardian and child will be offered the opportunity to discuss formally with the Manager if this formal warning requires any clarification.

Serious incidents

In the case of antisocial behaviour such as violence towards others, persistent swearing/bullying, willful disobedience, or more serious problems, the Manager or Play Leader shall phone the parent/carer to come collect their child immediately. They shall also speak to the parent/carer that day, who will be shown the entry in the Incident Book, and asked to sign it to show that they have read it. A letter of temporary exclusion or permanent exclusion shall be issued. Exclusion of a parent/carer may also be enforced due to aggressive or inappropriate behavior.

Emergency procedure

On the decision of at least two Play workers and the Manager a child may be suspended immediately by informing the parent/carer in the case of a sudden and serious disciplinary problem.

The Use of Physical Interventions

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Physical intervention may be recognised as part of an individual care plan and training will be sought.

Staff may choose to use physical interventions only as a last resort and only then if they have reasonable grounds for believing that immediate action is necessary to prevent a child from significantly injuring themselves or others or to prevent serious damage to property. In this situation staff will have not been deemed to have used corporal punishment or to have committed an offence.

Before reaching this stage, staff will have used all possible non-physical actions, such as dialogue and diversion, to deal with the behaviour. The child or children concerned will be warned verbally that physical intervention will be used if they do not stop.

A dialogue will be maintained with the child or children at all times, so that the member of staff can explain what they are doing and why they are doing it. Staff will make every effort to avoid the use of physical interventions if they are alone with the child or children.

Only the minimum force necessary to prevent injury or damage should be applied. For example, by diverting a child or children, perhaps by leading the child away by a hand or by an arm around their shoulders.

Staff will use physical intervention as an act of care and control and never punishment.

Physical interventions will not be used purely to force a child to do what they have been told and when there is no immediate risk to people or property.

As soon as it is safe, the physical intervention should be gradually relaxed to allow the child or children to regain self-control. The force of the physical intervention will be always appropriate to the age, size and strength of the child or children involved.

If staff are not confident about their ability to contain a particular situation or type of behaviour, consideration will be given to calling the Manager or, in extreme cases, the police.

Where a member of staff has had to intervene physically to restrain a child, the Manager will be notified and the incident recorded in the Incident Book. Or Behaviour Book. The incident will be discussed with the parent/carer at the earliest possible opportunity and a signature requested.

If a staff member commits any act of corporal punishment, violence or abuse towards a child at the Club, serious disciplinary action will be implemented, according to the provisions of the Staff Disciplinary Procedures policy. The use of physical intervention for the purpose of averting immediate danger will not be viewed as a staff disciplinary offence.

Bullying

The Club is committed to providing an environment for children and staff that is safe, welcoming and free from bullying. Bullying of any form is unacceptable at the Club whether the offender is a child or an adult. The victim is never responsible for being the target of a bully and a zero tolerance stance will always be taken.

Everyone involved in our Club- staff, children and parents/carers, will be made aware of our stance on bullying. Such behaviour will not be tolerated or excused under any circumstances.

The Club defines bullying as the repeated harassment of others through emotional, physical, verbal or psychological abuse. Examples of such behaviour are as follows:

- Emotional: Being deliberately unkind, shunning or excluding another person from a group or tormenting them. For example, forcing another person to be 'left out' of a game or activity, passing notes about others or making fun of another person.
- Physical: Pushing, knocking into, scratching, spitting, kicking, hitting, biting, taking or damaging belongings, tripping up, punching or using any other sort of violence against another person.
- Verbal: Name-calling, put-downs, ridiculing or using words to attack, threaten or insult. For example, spreading rumours or making fun of another person's appearance.
- Psychological: Behaviour likely to instil a sense of fear or anxiety in another person.

Preventing Bullying Behaviour

The Manager and the staff will make every effort to create a tolerant and caring environment at the Club, where bullying behaviour is not acceptable. Staff will discuss the issues surrounding bullying openly, including why bullying behaviour will not be tolerated and what the consequences of bullying behaviour will be.

Dealing with Bullying Behaviour

Despite all efforts to prevent it, bullying behaviour is likely to occur on occasion and The Greenfield Club recognises this fact. In the event of such incidents, the following principles will govern the Club's responses:

- All incidents of bullying will be addressed thoroughly and sensitively.
- Children will be encouraged to immediately report any incident of bullying that they witness. They will be reassured that what they say will be taken seriously and handled carefully.
- All staff and volunteers have a duty to inform the Manager if they witness an incident of bullying involving children or adults at our Club.
- If a child or a member of staff tells someone that they are being bullied, they will be given the time to explain what has happened and reassured that they were right to tell.
- The individual who has been the victim of bullying will be helped and supported by the staff team.
- They will be kept under close supervision and staff will check on their welfare regularly.
- In most cases, bullying behaviour can be addressed according to the strategies set out in the Behaviour Management policy. The bully will be encouraged to discuss their behaviour and think about how their behaviour can impact upon another person's well-being. They shall also be given time to talk through the consequences of their actions.

- Where appropriate, they will be encouraged to talk through the incident with the other person concerned.
- A member of staff will inform the parents/carers of all the children involved in a bullying incident at the earliest possible opportunity. If appropriate, staff will facilitate a meeting between the relevant parents/carers. At all times, staff will handle such incidents with care and sensitivity.
- All incidents of bullying will be reported to the Manager and will be recorded on the Incident Record Sheet.
- In the light of reported incidents, the Manager and other relevant staff members will review the Club's procedures in respect of bullying.

Children's Rights Policy

At Wild About Play we recognise and actively promote that every child does matter and all children have rights; with these rights comes responsibilities.

Articles 1-40: The rights and responsibilities of the United Nations Convention on the Rights of a Child

Article	Rights	Responsibilities	Relevant Club Policies
1	Everyone under the age of 18 years of age has all the rights stated in the UN Convention on the Rights of the Child		
2	The convention applies to everyone, whatever their race, religion, abilities, whatever they think, say, whatever type of family they come from	Everyone has the responsibility to treat others how they wish to be treated with respect, without criticism, or abuse	Equal Opportunities, Anti Bullying Policies
3	All organisations concerned with children should work towards what is best for each child	Everyone has the responsibility to work with the organisation. And to support one another	Safeguarding, Early Years Foundation Stage, Play Policies
4	Governments should take all necessary steps to make these rights available to all children	Everyone has the responsibility to learn and understand and respect these rights	Admissions Policy
5	Governments should respect the rights and responsibilities of families to direct and guide their children so that, as they grow, they learn to use their rights properly	Everyone has the responsibility to learn and understand and respect these rights	Early Years Foundation Stage, Equal Opportunities Policies
6	All children have the right to life. Governments should ensure that children survive and develop healthily	Everyone has the responsibility to be kept safe and to have their basic needs met	Safeguarding, Sick Children and Accidents, Inclusion Policies
7	All children have the right to a legally registered name, and nationality. Also the right to know and as far as possible to be cared for by their parents	Everyone has the responsibility to recognise people by their name and to respect their cultural differences	Admissions Policy
8	Governments should respect children's rights to a name, a nationality and family ties	Everyone has the responsibility to recognise people by their name and to	Equal Opportunities and

Articles 1–40: The rights and responsibilities of the United Nations Convention on the Rights of a Child

Article	Rights	Responsibilities	Relevant Club Policies
		respect their cultural differences	Admission Policies
9	Children should not be separated from their parents unless it is for their own good. For example, if a parent is mistreating or neglecting a child. Children whose parents have separated have the right to stay in contact with both parents, unless they might hurt the child.	Everyone has the responsibility to love and care for others	Admissions and Safeguarding Policies
10	Families who live in different countries should be allowed to move between these countries so that parents and children can stay in contact, or get back together as a family	Everyone has the responsibility to respect their cultural differences	Equal Opportunities Policy
11	Governments should take steps to stop children being taken out of the country illegally	Everyone has the responsibility to keep one another safe	Equal Opportunities Policy
12	Children have the right to say what they think should happen, when adults are making decisions that affect them and to have their opinions taken into account	Everyone has the responsibility to be listened to and heard loud and clear so that the needs, wishes and feelings of children are understood and acted upon	Involving and Consulting Children, Safeguarding, Equal Opportunities Policies
13	Children have the right to get and to share information, as long as the information is not damaging to them or to others	Everyone has the responsibility to only write the truth about others and for that information be made available	Early Years Foundation Stage and Confidentiality Policies
14	Children have the right to think and believe what they want, and to practise their religion, as long as they are not stopping other people from enjoying their rights. Parents should guide their children on these matters	Everyone has the responsibility to respect individuals and their religious differences	Equal Opportunities and Involving and Consulting Children Policies

Articles 1-40: The rights and responsibilities of the United Nations Convention on the Rights of a Child

Article	Rights	Responsibilities	Relevant Club Policies
15	Children have the right to meet together and to join groups and organisations, as long as this does not stop other people from enjoying their rights	Everyone has the responsibility to respect each other's choices	Equal Opportunities and Involving and Consulting Children Policies
16	Children have a right to privacy. The law should protect them from attacks against their way of life, their good name, their families and their homes	Everyone has the responsibility to keep one another safe and to respect cultural differences	Safeguarding, Anti Bullying, Equal Opportunities and Confidentiality Policies
17	Children have the right to reliable information from the mass media. Television, radio and newspapers should provide information that children can understand, and should not promote materials that could harm children	Everyone has the responsibility to make sure that TV, radio, films, music, newspapers and magazines that are available are not offensive to each other	Involving and Consulting Children and Safeguarding Policies
18	Both parents share responsibility for bringing up their children, and should always consider what is best for each child. Governments should help parents by providing services to support them, especially if both parents work	Everyone has the right to see both parents who help to decide what is best	Admissions Policy
19	Governments should ensure that children are properly cared for, and protect them from violence, abuse and neglect by their parents, or anyone else who looks after them	Everyone has the responsibility to keep each other safe and to tell a responsible adult if they or they believe somebody is being hurt by an adult	Safeguarding Policy
20	Children who cannot be looked after by their own family must be looked after properly, by people who respect their religion, culture and language	Everyone has the responsibility to respect cultural differences	Equal Opportunities Policy
21	When children are adopted the first concern must be what is best for them. The same rules should apply whether the children are adopted in the country where they were born, or if they are taken to live in another country	Everyone has the responsibility to respect cultural differences	Equal Opportunities Policy

Articles 1–40: The rights and responsibilities of the United Nations Convention on the Rights of a Child

Article	Rights	Responsibilities	Relevant Club Policies
22	Children who come into a country as refugees should have the same rights as children born in that country	Everyone has the responsibility to respect their cultural differences	Equal Opportunities Policy
23	Children who have any kind of disability should have special care and support, so that they can lead full and independent lives	Everyone has the responsibility to respect others for their differences	Equal Opportunities and Admissions Policies
24	Children have the right to good quality health care, to clean water, nutritious food, and a clean environment so that they will stay healthy. Rich countries should help poor countries achieve this	Everyone has the responsibility to help others get clean water, basic health care and to prevent others from starving	Health and Safety, Administering Medication, Healthy Eating Policies
25	Children who are looked after by the local authority, rather than their parents should have their situation reviewed regularly	Everyone has the responsibility to be listened to and heard loud and clear so that the needs, wishes and feelings of children are understood and acted upon	Involving and Consulting Children Policy
26	The government should provide extra money for the children of families in need	Everyone has the responsibility to spend money wisely	Admissions, Payments and Fees Policy
27	Children have a right to a standard of living that is good enough to meet their physical and mental needs. The government should help families who cannot afford to provide this	Everyone has the responsibility to make sure all children have a standard of living that meets their basic needs	Safeguarding Policy
28	All children and young people have a right to primary education, which should be free. Wealthy countries should help poorer countries to achieve this. Discipline in schools should respect children's human dignity. Young people should be encouraged to reach the highest level of education they are capable of	Everyone has the responsibility to encourage and develop one another	Early Years Foundation Stage, Behaviour Management, Play Policies

Articles 1–40: The rights and responsibilities of the United Nations Convention on the Rights of a Child

Article	Rights	Responsibilities	Relevant Club Policies
29	Education should develop each child's personality and talents to the full. It should encourage children to respect their parents, and their own and other cultures	Everyone has the responsibility to encourage and develop	Equal Opportunities, Early Years Foundation Stage Policies
30	Children have a right to learn and use language and customs of their families, whether these are shared by the majority of people in the country or not	Everyone has the responsibility to encourage and respect the development of other languages and customs	Equal Opportunities Policy
31	All children have the right to relax and play, and to join in a wide range of activities	Everyone has the responsibility to play how they want to, when they want to and with whom they want	Play Policy
32	The government should protect children from work that is dangerous, or might harm their health or education	Everyone has the responsibility to keep one another safe from harm	Health and Safety, Playworker Employment and Recruitment Policies
33	The government should provide ways of protecting children from dangerous drugs	Everyone has the responsibility to protect each other from using dangerous drugs	Smoking Drugs and Alcohol, Safeguarding Policies
34	The government should protect children from sexual abuse	Everyone has the responsibility to keep all children safe from abuse	Safeguarding, Playworker Employment and Recruitment Policies
35	The government should make sure children are not abducted or sold	Everyone has the responsibility to keep all children safe from harm	Safeguarding, Playworker Employment and

Articles 1-40: The rights and responsibilities of the United Nations Convention on the Rights of a Child

Article	Rights	Responsibilities	Relevant Club Policies
			Recruitment Policies
36	Children should be protected from activities that could harm their development	Everyone has the responsibility to keep all children safe from harm	Health and Safety, Risk Assessment, Play Policies
37	Children who break the law should not be treated cruelly. They should not be put in prison with adults and should be able to keep contact with their parents	Everyone has the responsibility to be kept safe from harm and have their needs met	Safeguarding Policy
38	Governments should not allow children under 15 to join the army	Everyone has the responsibility to be kept safe from harm	Safeguarding Policy
39	Children who have been neglected or abused should receive special help to restore their self-respect	Everyone has the responsibility to be kept safe from harm, and to love and care for others	Safeguarding, Inclusion Policies
40	Children who are accused of breaking the law should receive legal help. Prison sentences for children should only be used for the most serious offences	Everyone has the responsibility to listen to one another and have their needs met	

Children Settling In

All children are unique and the amount of time that a child takes to settle into the Club can vary enormously. Therefore, children will be given time to settle in at their own pace, so as to make them feel welcome, safe and confident in a new environment.

- ✱ The Club strongly encourages parents/carers to visit the premises with their children before they are due to start. During this time, the Club requires that the parents/carers complete and return the relevant paperwork.

Children new to the Club will be greeted in a warm and friendly manner. They will be introduced to all members of staff and told about any other regular visitors to the Club.

Children and their parents/carers will be informed about Club's routines and the programme of activities. They will be shown around, told where they can and cannot go, and have both registration and signing in/out procedures made clear.

Ground Rules will be explained to the child and they will be encouraged to ask questions and raise any concerns. The child will be told about the Evacuation procedure and the locations of all fire exits, according to the provisions to the Fire Safety policy.

- Parents/carers are offered the opportunity to stay with their child for a period of time during their first week.
- On their first day, children will be introduced to the other children at the Club.
- The new child may be allocated a 'buddy' who, under the supervision of a member of staff, will show them around and introduce them to the other children. The child will then be encouraged to get to know the other children and settle into the group.
- Every child will be assigned a Key person from the staff team who will ensure that the child feels included in play and activities and that their needs are being met.
- All staff will supervise children new to the Club to ensure that they are happy in their new surroundings. The appropriate level of such supervision will be judged according to the child's age, maturity and previous experiences.
- Staff will ask how a child is feeling, what activities they enjoy and if they are unhappy about anything.
- How well new children are settling shall be discussed at the monthly staff meetings to ensure that information is shared appropriately.
- If it seems that a child is taking a long time to settle in, this will be discussed with their parents/carers at the earliest opportunity. Likewise, if a parent/carer feels that there is a problem during the settling in period, they should raise this with a member of staff.
- Staff will always be available to discuss any concerns or other issues with parents/carers regarding their child and their attendance at the Club. If parents/carers wish to meet with the Manager, they should make an appointment to come in for a chat.

3.74 Complaints

The Club is committed to providing a safe, stimulating, consistent and accessible service to children and their parents/carers. We always aim to provide high quality services for everyone, but accept that sometimes things do not always go to plan.

In such circumstances, we want to know so that we can put them right and learn from our mistakes.

3.74 This policy constitutes the Club's formal Complaints Procedure. It is available on the premises at all times.

Under normal circumstances, the Manager will be responsible for managing complaints and communicating with Ofsted if needed.

If a complaint is made against the Manager, then the Deputy Manager will conduct the investigation. **3.74** All written complaints and their outcome, will be recorded in detail in an Incident Record sheet and a provider complaints log will be completed.

If a parent/carer has a complaint about some aspect of the Club's activity, or about the conduct of an individual member of staff, it will often be possible to resolve the problem by simply speaking to the individual concerned and/or to the Manager. As outlined in the Partnership with Parents/Carers policy, the Club is committed to open and regular dialogue with parents/carers.

The Club welcomes all comments on its services, regardless of whether they are positive or negative and regular verbal communications and questionnaires are carried out on a regular basis.

Stage One

In the first instance, parents/carers are encouraged to speak directly to the relevant member of staff, if deemed appropriate. If not, the Manager should be approached and they will try to resolve the problem. If a satisfactory resolution cannot be found, then Stage Two of the procedure will formally come into operation.

Stage Two

If informal discussions about a complaint or problem have not produced a satisfactory resolution to the situation, parents/carers should put their complaint in detail and in writing to the Manager or Deputy Manager. Relevant names, dates, evidence and any other important information on the nature of the complaint should be included.

3.74 The Club will acknowledge receipt of the complaint as soon as possible and the outcome of an investigation will be given to the complainant within 28 days of having received the complaint.

The Manager or Deputy will be responsible for sending them a full and formal response to the complaint.

3.75 Making a Complaint to Ofsted

Any parent/carer can, at any time, submit a complaint to Ofsted about any aspect of registered childcare provision which relates to the Early Years Foundation stage. Ofsted will consider and investigate all complaints received that are in breach of the relevant statutory requirements. Please note that Ofsted do not involve themselves in financial disputes.

Our complaints policy and procedure will be readily available and displayed at Club along with Ofsted's contact details below.

Records of all complaints must be retained for a period of 5 years on which the record was made. A summary of complaints must be available to parents on request. A model complaints form can be downloaded from www.ofsted.gov.uk and photocopied.

Ofsted Address:

Ofsted
The National Business Unit
Piccadilly Gate
Store Street
MANCHESTER
M1 2WD

Telephone: 0300 123 1231

Confidentiality Policy

Statement of intent

It is the Club's intention to respect the privacy of children and their parents and carers, whilst ensuring that they access high quality early years care, play and learning in our setting.

Aim

The Club aims to ensure that all parents and carers, can share their information and that it will only be used to enhance the welfare of their children.

We meet the requirements of the Human Rights Act 1998 with regard to protecting the individual's rights to a private and family life, home and correspondence. Our only justification to interfering with this right is where we believe that a child may be at risk of significant harm, to prevent a crime or disorder.

We meet the requirements of the Data Protection Act 1998 with regard to the information we gather from or about families, how we gather it, store it and use it. Our procedures enable us to meet these requirements.

We have regard to the Common Law Duty of Confidentiality and only share information with other professionals or agencies on a 'need to know' basis, with consent from parents, or without their consent in specified circumstances to do with safeguarding children.

Personal Records

- These include membership and booking forms, signed consents, and correspondence concerning the child or family, reports or minutes from meetings concerning the child from other agencies, an on going record of relevant contact with parents, and observations by staff on any confidential matter involving the child, such as developmental concerns or child protection matters, incident and accident logs, care plans, behaviour plans etc
- These confidential records are stored in a lockable file or cabinet and are kept secure by the person in charge in a suitably safe place. Electronically stored information is password protected and kept stored securely.
- Parents have access, in accordance with the access to records procedure, to the files and records of their own children but do not have access to information about any other child
- Staff will not discuss personal information given by parents with other members of staff, except where it affects planning for the child's needs. Staff induction includes an awareness of the importance of confidentiality in the role of the key person.

Information Sharing

There are times when we are required to share information about a child or their family. These are when:

- There are concerns a child is or may be suffering significant harm
- The 'reasonable cause to believe' a child is or may be suffering significant harm is not clear
- There are concerns about 'serious harm to adults' (such as domestic violence or other matters affecting the welfare of parents).
- We explain to families about our duty to share information for the above reasons.

- Where we have concerns, we would normally gain consent from families to share. This does not have to be in writing, but we record in the child's file that we have gained verbal consent as a result of discussing a concern that we need to refer to a social care agency.
- We do not seek consent from parents to share information where we believe that a child, or sometimes a vulnerable adult, may be endangered by seeking to gain consent. For example, where we have cause to believe a parent may try to cover up abuse, or threaten a child.
- Where we take a decision to share information without consent this is recorded in the child's file and the reason for doing so is clearly stated.
- Where evidence to support our concerns is not clear we may seek advice from our local Social Care agency or the NSPCC.
- We only share relevant information that is accurate, factual, non-judgemental and up to date.

Other Records

Issues to do with the employment of staff, whether paid or unpaid, remain confidential to the people directly involved with making staffing decisions.

When students on recognised qualifications and training, are observing in the setting, they are advised of our confidentiality policy and required to respect it.

Access to Personal Records. "Subject Access Request (SAR).

Parents may request access to any records help on their child and family following the procedure below:

- Any request to see the child's personal file by a parent or person with parental responsibility must be made in writing to the Manager
- The Manager sends a written acknowledgement
- The Club commits to providing access within 14 days - although this may be extended.
- The Club Manager prepares the file for viewing
- All third parties are written to, stating that a request for disclosure has been received and asking for their permission to disclose to the person requesting it. A copy of these letters are retained on the file
- Third parties' include all family members who may be referred to in the records
- It also includes workers from any other agency, including Social Care, the Health Authority, etc. It is usual for agencies to refuse consent to disclose, preferring the individual to go directly to them
- When all the consents/refusals to disclose have been received these are attached to the copy of the request letter
- A photocopy of the complete file is taken
- The Manager will go through the file and remove any information which a third party has refused consent to disclose. This is best done with a thick black marker, to score through every reference to the third party and information they have added to the file
- What remains is the information recorded by the setting, detailing the work initiated and followed by them in relation to confidential matters. This is called the 'clean copy'
- The 'clean copy' is photocopied for the parents who are then invited in to discuss the contents. The file should never be given straight over, but should be gone through by the setting leader, so that it can be explained

- Legal advice may be sought before sharing a file, especially where the parent has possible grounds for litigation against the setting or another (third party) agency.
- All the undertakings above are subject to the paramount commitment of the setting, which is to the safety and well-being of the child. Please see also our policy on Safeguarding.

1. Purpose of the policy

1.1 Wild About Play is committed to complying with privacy and data protection laws including:

- (a) the General Data Protection Regulation (“**the GDPR**”) and any related legislation which applies in the UK, including, without limitation, any legislation derived from the Data Protection Bill 2017;
 - (b) the Privacy and Electronic Communications Regulations (2003) and any successor or related legislation, including without limitation, E Privacy Regulation 2017/003;
 - (c) all other applicable laws and regulations relating to the processing of personal data and privacy, including statutory instruments and, where applicable, the guidance and codes of practice issued by any other supervisory authority.
- (together “**the Legislation**”)

1.2 This policy sets out what we do to protect individuals’ data.

1.3 Anyone who handles personal data in any way on behalf of Wild About Play must ensure that we comply with this policy. Section 3 of this policy describes what comes within the definition of “personal data”. Any breach of this policy will be taken seriously and may result in disciplinary action or more serious sanctions.

1.4 This policy may be amended from time to time to reflect any changes in legislation, regulatory guidance or internal policy decisions.

2. About this policy

2.1 The types of personal data that we may handle include details of:

Employees
Parents/Guardians
Children
Suppliers

2.2 Sian Pumford is Risk Manager at Wild About Play and is responsible for ensuring compliance with GDPR and with this policy. Any questions or concerns about this policy should be referred in the first instance to Sian Pumford who can be contacted at wapridgewood@yahoo.co.uk or on 07531 344 549.

3. Definitions of data protection terms

3.1 The following terms will be used in this policy and are defined below:

3.2 **Data Subjects** include all living individuals about whom we hold personal data, for instance an employee or supporter. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

3.3 **Personal Data** means any information relating to a living person who can be identified directly or indirectly from that information (or from that information and other information in our possession). Personal data can be factual (such as name, address or date of birth) or it can be an opinion (such as a performance appraisal). It can also include an identifier such as an identification number, location data, an online identifier specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

3.4 **Data Controllers** are the people who, or organisations which, decide the purposes and the means for which, any personal data is processed. They have a responsibility to process personal data in compliance with the Legislation. Wild About Play is the data controller of all personal data that we manage in connection with our work and activities.

3.5 **Data Processors** include any person who processes personal data on behalf of a data controller. Employees of data controllers are excluded from this definition, but it could be other organisations such as website hosts, fulfilment houses or other service providers which handle personal data on our behalf.

3.6 **European Economic Area** includes all countries in the European Union as well as Norway, Iceland and Liechtenstein.

3.7 **ICO** means the Information Commissioner's Office (the authority which oversees data protection regulation in the UK).

3.8 **Processing** is any activity that involves use of personal data, whether or not by automated means. It includes but is not limited to:

- (a) collecting;
- (b) recording;
- (c) organising;
- (d) structuring;
- (e) storing;
- (f) adapting or altering;
- (g) retrieving;
- (h) disclosing by transmission;
- (i) disseminating or otherwise making available;
- (j) alignment or combination;
- (k) restricting;
- (l) erasing; or
- (m) destruction of personal data.

3.9 **Sensitive Personal Data (which is defined as "special categories of personal data" under the GDPR)** includes information about a person's:

- (a) racial or ethnic origin;
- (b) political opinions;
- (c) religious, philosophical or similar beliefs;
- (d) trade union membership;
- (e) physical or mental health or condition;
- (f) sexual life or orientation
- (g) genetic data;
- (h) biometric data;
- (i) such other categories of personal data as may be designated as "special categories of personal data" under the Legislation.

4. Data protection principles

- 4.1 Anyone processing personal data must comply with the six data protection principles set out in the GDPR. We are required to comply with these principles (summarised below), and show that we comply, in respect of any personal data that we deal with as a data controller.

4.2 Personal data should be:

- (a) processed fairly, lawfully and transparently;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a way which is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary for the purpose for which it is held;
- (d) accurate and, where necessary, kept up to date;
- (e) not kept longer than necessary; and
- (f) processed in a manner that ensures appropriate security of the personal data.

5. Processing data fairly and lawfully

- 5.1 The first data protection principle requires that personal data is obtained fairly and lawfully and processed for purposes that the data subject has been told about. Processing will only be lawful if certain conditions can be satisfied, including where the data subject has given consent, or where the processing is necessary for one or more specified reasons, such as where it is necessary for the performance of a contract.

5.2 To comply with this principle, every time we receive personal data about a person directly from that individual, which we intend to keep, we need to provide that person with **“the fair processing information”**. In other words we need to tell them:

- (a) the type of information we will be collecting (categories of personal data concerned);
- (b) who will be holding their information, i.e. Wild About Play including contract details and the contact details of our Data Protection Officer (if we have one);
- (c) why we are collecting their information and what we intend to do with it for instance to send them mailing updates about our activities;
- (d) the legal basis for collecting their information (for example, are we relying on their consent, or on our legitimate interests or on another legal basis);
- (e) if we are relying on legitimate interests as a basis for processing what those legitimate interests are;
- (f) whether the provision of their personal data is part of a statutory or contractual obligation and details of the consequences of the data subject not providing that data;
- (g) the period for which their personal data will be stored or, where it is not possible, the criteria that will be used to decide that period;
- (h) details of people or organisations with whom we will be sharing personal data;
- (i) if relevant, the fact that we will be transferring their personal data outside the EEA and details of relevant safeguards;
- (j) the existence of any automated decision-making including profiling in relation to personal data.

- 5.3 Where we obtain personal data about a person from a source other than the person his or her self, we must provide that individual with the following information **in addition to that listed under 5.2 above**:

- (a) the categories of personal data that we hold; and
- (b) the source of the personal data and whether this is a public source.

5.4 In addition, in both scenarios, (where personal data is obtained directly and indirectly) we must also inform individuals of their rights outlined in section 9 below, including the right to lodge a complaint with the ICO and, the right to withdraw consent to the processing of their personal data.

5.5 This fair processing information can be provided in a number of places including on web pages, in mailings or on application forms. We must ensure that the fair processing information is concise, transparent, intelligible and easily accessible.

6. Processing the data for the original purpose

6.1 The second data protection principle requires that personal data is only processed for the specific, explicit and legitimate purposes that the individual was told about when we first obtained their information.

6.2 This means that we should not collect personal data for one purpose and then use it for another. If it becomes necessary to process a person's information for a new purpose, the individual should be informed of the new purpose beforehand. For example, if we collect personal data such as a contact number or email address, in order to update a person about our activities it should not then be used for any new purpose, for example to share it with other organisations for marketing purposes, without first getting the individual's consent;

7. Personal data should be adequate and accurate

The third and fourth data protection principles require that personal data that we keep should be accurate, adequate and relevant. Data should be limited to what is necessary in relation to the purposes for which it is being processed. Inaccurate or out-of-date data should be destroyed securely, and we must take every reasonable step to ensure that personal data which is inaccurate is corrected.

8. Not retaining data longer than necessary

8.1 The fifth data protection principle requires that we should not keep personal data for longer than we need to for the purpose it was collected for. This means that the personal data that we hold should be destroyed or erased from our systems when it is no longer needed. If you think that we are holding out-of-date or inaccurate personal data, please speak to Sian Purnford.

8.2 For guidance on how long particular types of personal data that we collect should be kept before being destroyed or erased, please contact Sian Purnford or seek legal advice.

9. Rights of individuals under the GDPR

9.1 The GDPR gives people rights in relation to how organisations can process their personal data. Everyone who holds personal data on behalf of Wild About Play needs to be aware of these rights. They include (but are not limited to) the right:

- (a) to request a copy of any personal data that we hold about them (as a data controller), as well as a description of the type of information that we are processing, the uses that are being made of the information, details of anyone to whom their personal data has been disclosed, and how long the data will be stored (known as subject access rights);
- (b) to be told, where any information is not collected from the person directly, any available information as to the source of the information;
- (c) to be told of the existence of any automated decision-making;
- (d) to object to the processing of data where the processing is based on either the conditions of public interest or legitimate interests;

- (e) to have all personal data erased (the right to be forgotten) unless certain limited conditions apply;
- (f) to restrict processing where the individual has objected to the processing;
- (g) to have inaccurate data amended or destroyed; and
- (h) to prevent processing that is likely to cause unwarranted substantial damage or distress to themselves or anyone else.

10. Data Security

10.1 The sixth data protection principle requires that we keep secure any personal data that we hold.

10.2 We are required to put in place procedures to keep personal data that we hold secure, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisation measures.

10.3 When we are dealing with sensitive personal data, more rigorous security measures are likely to be needed, for instance, if sensitive personal data (such as details of an individual's health, race or sexuality) is held on a memory stick or other portable device it should always be encrypted.

10.4 When deciding what level of security is needed, your starting point should be to look at whether the information is sensitive or highly confidential and how much damage could be caused if it fell into the wrong hands.

10.5 The following security procedures and monitoring processes must be followed in relation to all personal data processed by us:

- (a) encryption of personal data;
- (b) measures to restore availability and access to data in a timely manner in event of physical or technical incident;
- (c) process for regularly testing, assessing and evaluating effectiveness of security measures;
- (d) backing up data (daily back-ups should be taken of all data on the system and data should not be stored on local drives or removable media as these will not be backed up);
- (e) entry controls (any stranger seen in in entry-controlled areas should be reported);
- (f) staff should ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended;
- (g) paper documents should be shredded;
- (h) memory sticks, CD-ROMs and other media on which personal data is stored should be physically destroyed when they are no longer required;
- (i) personal data must always be transferred in a secure manner (the degree of security will depend on the nature of the data – the more sensitive and confidential the data, the more stringent the security measures should be);
- (j) other measures to ensure confidentiality, integrity, availability and resilience of processing systems;
- (k) desks and cupboards should be kept locked if they hold confidential information of any kind (personal information is always considered confidential) and staff must keep data secure when travelling or using it outside the offices.

11. Transferring data outside the EEA

11.1 The GDPR requires that when an organisation transfers personal data outside the EEA, they take steps to ensure that the data is properly protected.

11.2 The European Commission has determined that certain countries provide an adequate data protection regime. These countries currently include Andorra, Argentina, Canada, Guernsey, Isle of Man, Israel, New Zealand, Switzerland, Faroe Islands, Jersey and Uruguay, but this list may be updated.

11.3 As such, personal data may be transferred to people or organisations in these countries without the need to take additional steps beyond those you would take when sharing personal data with any other organisation. In transferring personal data to other countries outside the EEA (which are not on this approved list), it will be necessary to enter into an EC-approved agreement, seek the explicit consent of the individual, or rely on one of the other derogations under the GDPR that apply to the transfer of the personal data outside the EEA.

11.4 The EU-US Privacy Shield is an instrument that can be used as a legal basis for transferring personal data to organisations in the US, although specific advice should be sought from the data protection officer (if we have one) before transferring personal data to organisations in the US.

11.5 For more information please speak to Sian Pumford or seek legal advice.

12. Processing sensitive personal data

12.1 On some occasions we may collect information about individuals that is defined by the GDPR as **special categories of personal data**, and special rules will apply to the processing of the data. In this policy we refer to “special categories of personal data” as “sensitive personal data”. The categories of sensitive personal data are set out in the definition in section 3.9.

12.2 Purely financial information is not technically defined as sensitive personal data by the GDPR. However, particular care should be taken when processing such data, as the ICO will treat a breach relating to financial data very seriously.

12.3 In most cases, in order to process sensitive personal data, we must obtain explicit consent from the individuals involved. As with any other type of information we will also have to be absolutely clear with people about how we are going to use their information.

12.4 It is not always necessary to obtain explicit consent. There are a limited number of other circumstances in which the GDPR permits organisations to process sensitive personal data. If you are concerned that you are processing sensitive personal data and are not able to obtain explicit consent for the processing, please speak to Sian Pumford.

13. Notification

13.1 We recognise that whilst there is no legal obligation for us to make an annual notification to the ICO under the GDPR, we will consult with the ICO where necessary when we are carrying out “high risk” processing.

13.2 We will report breaches (other than those which are likely to be a risk to individuals) to the ICO where necessary, within 72 hours. We will also notify affected individuals where the breach is likely to result in a high risk to the rights and freedom of these individuals.

14. Monitoring and reviewing of the policy

14.1 This policy is reviewed yearly by our Management team to ensure that it is achieving its objectives.

WILD about PLAY

Wild About Play

**Data Subject Requests
Procedure Manual**

Wild About Play

Data Subject Requests Procedure
Manual

Wild About Play

Data Subject Requests Procedure

Manual

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1 INTRODUCTION

This procedure manual outlines the requirements of the General Data Protection Regulation ('the GDPR') in relation to Subject Access Requests and Data Subject Requests and the procedures which Wild About Play has put in place to ensure that staff comply with these. Its aim is -

- to encourage consistency and best practice in compliance regarding Subject Access and Data Subject Requests of the GDPR across Wild About Play, and
- to answer frequently asked questions about Subject Access Requests and Data Subject Requests.

This manual sets out Wild About Play's approach to handling Subject Access and Data Subject Requests from members, including those from Wild About Play employees.

1.1 WHAT IS A SUBJECT ACCESS REQUEST (SAR)?

The GDPR gives individuals the right to be told what personal information Wild About Play is holding about them and, unless an exemption applies, to receive a copy of that information. In the majority of scenarios, the individual ("Data Subject") making the request will be a parent or an employee/ex-employee.

The individual does this by making a subject access request via the manager at Wild About Play (the Data Controller). The request must be in writing (including faxes and emails), so if a request is made by telephone or in person, the individual should be asked to put it in writing.

The request can be very broad (such as, 'give me a copy of information you hold about me') or it can be very precise ('give me a copy of the letter you wrote about me yesterday').

If a request does not mention the GDPR specifically or even say that it is a subject access request, it is nevertheless valid and should be treated as such if it is clear that the individual is asking for their own personal data.

A request is valid even if the individual has not sent it directly to the person who normally deals with such requests – so it is important to ensure that all staff can recognise a subject access request and treat it appropriately.

1.2 WHAT IS AN INDIVIDUAL ENTITLED TO?

Under the Right of access, an individual (the 'Data Subject') has the right to obtain confirmation that their data is being processed, access only to their own personal data, and not to information relating to other people (unless they are acting on behalf of that person) and other supplementary information contained in the Privacy Notice. Therefore, it is important to establish whether the information requested falls within the definition of personal data. In most cases, it will be obvious whether the information being requested is personal data, but there is separate guidance to help you decide in cases where it is unclear.

Subject access provides a right to see the information contained in personal data, rather than a right to see the documents that include that information.

Various exceptions to the right of subject access apply in certain circumstances or to certain types of personal data.

A copy of the information must be provided free of charge. However, you can charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

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You may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that you can charge for all subsequent access requests. The fee must be based on the administrative cost of providing the information.

1.3 WHAT TO DO IF YOU RECEIVE A SUBJECT DATA REQUEST

All subject access requests received must be passed to the club manager, Sian Purnford, with no exceptions.

1.4 INFORMATION REQUIRED BEFORE RESPONDING TO A SUBJECT ACCESS REQUEST

The GDPR allows you to confirm two things before you are obliged to respond to a request.

First, you can ask for enough information to judge whether the person making the request is the individual to whom the personal data relates. This is to avoid personal data about one individual being sent to another, accidentally or as a result of deception. The key point is that you must be reasonable about what you ask for. You should not request more information if the identity of the person making the request is obvious to you. This is particularly the case, for example, when you have an ongoing relationship with the individual. The level of checks you should make may well depend on the possible harm and distress which inappropriate disclosure of the information could cause to the individual concerned.

The second thing you are entitled to do before responding to a subject access request is to ask for information that you reasonably need to find the personal data covered by the request. Again, you need not comply with the subject access request until you have received this information. In some cases, personal data may be difficult to retrieve and collate. However, it is not acceptable for you to delay responding to a subject access request unless you reasonably require more information to help you find the data in question.

You should not ignore a request simply because you need more information from the person who made it. You should not delay in asking for this but should ensure the individual knows you need more information and should tell them what details you need. Provided you have done so, the 30-day period for responding to the request does not begin to run until you have received any additional information that is necessary.

1.5 CAN SUBJECT ACCESS REQUESTS BE MADE ON BEHALF OF OTHERS?

The GDPR does not prevent an individual making a subject access request via a third party. In these cases, you need to be satisfied that the third party making the request is entitled to act on behalf of the individual, but it **is the third party's responsibility to provide evidence of this entitlement**. This might be a written authority to make the request or it might be a more general power of attorney.

If you think an individual may not understand what information would be disclosed to a third party who has made a subject access request on their behalf, you may send the response directly to the individual rather than to the third party. The individual may then choose to share the information with the third party after having had a chance to review it.

1.6 DO I HAVE TO EXPLAIN THE CONTENTS OF THE INFORMATION I SEND TO THE INDIVIDUAL?

The GDPR requires that the information you provide to the individual must be provided in a concise, transparent, intelligible and easily accessible form using clear and plain language.

If the request is made electronically, you should provide the information in a commonly used electronic format. The GDPR includes a best practice recommendation that, where possible, organisations should be able to provide remote access to a secure self-service system which would provide the individual with direct access to his or her information (Recital 63). This will not be appropriate for all organisations, but there are some sectors where this may work well.

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The right to obtain a copy of information or to access personal data through a remotely accessed secure system should not adversely affect the rights and freedoms of others.

1.7 WHAT IF SENDING OUT COPIES OF INFORMATION WILL BE EXPENSIVE OR TIME CONSUMING?

In some cases, dealing with a subject access request will be an onerous task. This might be because of the nature of the request, because of the amount of personal data involved or because of the way in which certain information is held. Where requests are found to be manifestly unfounded or excessive you can;

- charge a reasonable fee taking into account the administrative costs of providing the information; or
- refuse to respond.

Where you refuse to respond to a request, you must explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

1.8 WHAT ABOUT REPEATED OR UNREASONABLE REQUESTS

The GDPR does not limit the number of subject access requests an individual can make to any organisation. However, it does allow some discretion when dealing with requests that are made at unreasonable intervals.

The GDPR says that you are not obliged to comply with an identical or similar request to one you have already dealt with, unless a reasonable interval has elapsed between the first request and any subsequent ones.

The GDPR gives you some help in deciding whether requests are made at reasonable intervals. It says that you should consider the following:

- The nature of the data – this could include considering whether it is particularly sensitive.
- The purposes of the processing – this could include whether the processing is likely to cause detriment to the individual.
- How often the data is altered – if information is unlikely to have changed between requests, you may decide that you are not obliged to respond to the same request twice.

1.9 WHAT ARE THE CONSEQUENCES OF NOT HANDLING A REQUEST CORRECTLY?

The consequences of failing to comply with the GDPR are serious. In the case of subject access requests:

- Individuals have the right to compensation in the event that they are damaged by a contravention of the GDPR, for example if we fail to supply them with the information they request (unless an exemption applies) within the 30-day time limit and their interests suffer as a result;
- Individuals may complain to the ICO about any decision we make regarding the disclosure or non-disclosure of their personal information. The ICO may serve an enforcement notice on us to release the information;
- Further, the individual making the request may seek an order for disclosure from the courts.

It is therefore important that we release information liable for disclosure within the 30-day limit. In the case of any dispute, it is important that Wild About Play Ltd is able to demonstrate that good practice was followed in association with its syndicators.

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2 WILD ABOUT PLAY PROCEDURE FOR PROCESSING SUBJECT ACCESS REQUESTS

The procedures to be followed upon receipt of a Subject Access Request are designed to enable Wild About Play to comply fully with the requirements of the General Data Protection Regulation.

As with Freedom of Information Requests, Subject Access Requests should be overseen, and decisions made by an appropriate 'Decision Maker'. The Decision Maker in Wild About Play is the manager of the club, Sian Pumford.

All responses must be approved at Manager or Trustee level before being passed to the individual making the request on or before day 30.

This will allow appropriate time for feedback and consideration by the trustees, if required.

2.1 STEP 1 – CHECK THAT THE REQUEST COMES WITHIN THE SCOPE OF THE GENERAL DATA PROTECTION REGULATION

For subject access requests, this means one that:

- has been received in writing (including email)
- is a request for information about the data subject;
- provides sufficient information to verify the data subject's identity;
- provides sufficient information to enable Wild About Play to locate the information required.

Please note the applicant does not have to quote the GDPR to have the request treated as such.

2.2 STEP 2 - VERIFY THE IDENTITY OF THE SUBJECT

Before disclosing any personal information, you must verify the identity of the applicant. Whilst it is important that you do not send copies of personal information to people who are not the data subject, you must not appear obstructive. The GDPR requires you to take reasonable measures to verify their identity. You should keep a record of what measures you take.

You can often verify identity from circumstances (e.g. address, internal employee email address. If this is not possible, you can write to the individual asking them to send you a photocopy of some form of identification such as their passport or driving licence).

2.3 STEP 3 - CLARIFY THE REQUEST

If the request is unclear or is very broad, contact the applicant to seek clarification or a narrowing of the request. This can be done by telephoning the applicant or responding to the support ticket. Where further information is required before a search can be undertaken, the applicant should be contacted within one working day of receipt.

2.4 STEP 4 - CALCULATE DEADLINE FOR A RESPONSE

On receipt of all required information you have a maximum of 30 calendar days to respond.

2.5 STEP 5 - ACKNOWLEDGEMENT OF RECEIPT OF SUBJECT ACCESS REQUEST

Acknowledge receipt of the request by email/letter from the employee or other individual.

This step should be completed no later than 17.00 pm on the day following receipt of the request.

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2.6 STEP 6 - SEARCH FOR INFORMATION

Based on your knowledge of your business area, decide where personal information about the applicant might be held and locate that information. You may need to search central filing systems, personnel records and shared databases.

2.7 STEP 7 - REVIEW INFORMATION CONSIDERING POSSIBLE EXEMPTIONS

Once you have collected together the information held about an individual, you must examine it in detail to establish if it can be released. This must be done on a case-by-case basis for each individual piece of information. In some cases, you might have to disclose only parts of particular documents.

Check that the record is actually about the person concerned and not someone else with the same name.

- Screen out any duplicate records.
- Only disclose information about the person making the request. Where a document contains personal data about others, consider blanking out names or contacting the third party to obtain their consent to disclose the record. Please see the Subject Access and Third-Party Information section below.
- Do not disclose information which would prejudice the prevention or detection of a crime. For example, if the police informed Wild About Play that a member of staff is under investigation, but the individual concerned was not aware of this, then we should not provide any information related to the investigation to the individual whilst the investigation is in progress. However, if the investigation is closed, or if the member of staff has been informed that there is an investigation underway, then the information should be disclosed in response to a subject access request.
- You should not disclose any records which contain advice from our legal representatives or where we are asking for legal advice or which were written as part of obtaining legal advice.
- Do not disclose information which is being used in negotiations with the individual if the information gives away our negotiating position and disclosing the information would weaken our negotiating position.
- In addition to the above, the GDPR contains a number of other exemptions.

You must not destroy information because it would be embarrassing to disclose. This is a criminal offence if it is done after a subject access request has been made. As you put the information together, you may discover material which does not reflect favourably on Wild About Play. For example, you may find papers which show that standard procedures were not followed, or documents which may cause offence to the data subject. These documents must be disclosed. However, you should bring their contents to the attention of the relevant business area manager to ensure that appropriate action is taken to address any issues they raise.

2.8 STEP 8 – THIRD PARTY CONSULTATION

In some circumstances, responding to a subject access request may involve providing information relating to another individual who can be identified from that information (third party information). In consideration of the exemptions in Step 7 above you should consult any third party who is included in the requested information if appropriate. Please see Subject Access and Third-Party Information section below. If you are contacting the third party to obtain their consent to disclose the record, please ensure a record is kept of this request.

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2.9 STEP 9 – RESPOND TO APPLICANT

Ensure the applicant is provided with all the personal information relating to them which meets their request, that is not exempt, and which will not disclose personal information relating to a third party (without their consent).

This must be done within 30 Calendar days.

Ensure the applicant is informed of his/her right of appeal to the ICO (excluding requests from syndicators where this is their responsibility as the Data Controller).

2.10 STEP 10 – UPDATE SUBJECT ACCESS REQUEST MONITORING LOG

The Club Manager will hold a file on each Subject Access Request in a restricted section of the database and must ensure that each request is fully documented by providing the following:

- Copies of all correspondence between Wild About Play, the individual and any other parties;
- A record of any telephone conversations used to verify the identity of the individual or the information required.
- A record of your decisions and how you came to make those decisions.
- Copies of information sent to the applicant.

The file should also contain the following information:

- The name of the applicant;
- The date the request was received;
- The 30-day response deadline;
- The date you replied to the subject access request

2.10.1 TIME LIMITS TO NOTE

- Confirmation of Identity Letter and/or Letter requesting clarification of requested information must be issued within 1 working day of receipt of initial request.
- Every subject access request must be acknowledged within 1 working day of receipt (after confirmation of identity & requested information, if required) of valid request.
- The information must be collated, and a decision made as to whether any exemption applies within 12 calendar days.
- Any third-party consultation must be done at the very latest by 12 calendar days to allow 10 working days for their response.
- Sufficient time should be given to review responses prior to day 30 (if applicable)
- The entire process must be completed to ensure the applicant receives a full response as quickly as possible, but no later than 30 calendar days of receipt.

2.10.2 REVIEW PROCESS

Please note that there is no Internal Review option for Subject Access Requests.

Applicants are directed to the ICO to appeal any decisions made by Wild About Play in relation to their request.

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3 SUBJECT ACCESS & THIRD-PARTY INFORMATION

In some circumstances, responding to a subject access request may involve providing information relating to another individual who can be identified from that information (third party information). This can give rise to conflict between the data subject's right of access and the third party's right to respect for his or her private life. When dealing with such requests, Wild About Play should be sensitive to and give proper consideration to this potential conflict before deciding whether to disclose third party information.

The disclosure of the third-party information in compliance with a subject access request may expose Wild About Play to complaint or action by a third party, for example a complaint to the ICO that Wild About Play has breached the principles or an action in the courts for breach of confidence.

Relevant factors to which Wild About Play should give consideration in deciding whether, or to what extent, the GDPR requires it to disclose third party information are set out below.

3.1 DOES THE REQUEST REQUIRE THE DISCLOSURE OF INFORMATION WHICH IDENTIFIES A THIRD- PARTY INDIVIDUAL?

You should consider whether it is possible to comply with the request without revealing information which relates to and identifies a third-party individual. In considering this, you should not only take into account the information being disclosed, but also any information which it reasonably believes the person making the request may have, or get hold of, that may identify the third-party individual.

You should give as much information as possible to the data subject without revealing the identity of the third party. This might be achieved by editing the information to remove names or other identifying details (the obligation is to provide information rather than documents).

However, in such cases, there will always be residual third-party information and so in all such cases you will need to take into consideration other factors before you are in a position to establish whether you are obliged to comply with the request in respect of the additional third-party information.

3.2 HAS THE THIRD-PARTY INDIVIDUAL CONSENTED?

The clearest grounds for disclosing the information is to get the third-party individual's consent. Where the third party has consented to the disclosure to the person making the request, you must comply with the request and disclose the third-party information.

However, there is no obligation to try to get consent. In practice, it may be difficult to get consent. The third party may be difficult to find, they may refuse to give consent, or it may be impractical or costly to try to get their consent in the first place. In these situations, you would then need to consider whether it was 'reasonable in all the circumstances' to disclose the information anyway.

There will be some circumstances where it will clearly be reasonable to disclose without trying to get consent, for example, where the information concerned will be known to the requesting individual anyway. Indeed it may not always be appropriate to try to get consent (for instance, if to do so would inevitably involve a disclosure of personal data about the requesting individual to the third party individual).

However, to avoid falling foul not only of the GDPR but other provisions of law, for example, confidentiality, disclosure without consent should not be made until proper consideration has been given to all the relevant factors.

3.3 WOULD IT BE REASONABLE IN ALL THE CIRCUMSTANCES TO DISCLOSE WITHOUT CONSENT?

The GDPR highlights some of the factors to be taken into account in deciding what would be 'reasonable in all the circumstances' but the list is not exhaustive. They are:

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- any steps taken by Wild About Play to seek the consent of the third party,
- whether the individual is capable of giving consent,
- any express refusal of consent by the third party.

Wild About Play would be expected to be able to justify and keep a record of the course of action and reasoning, including, for example, why it was decided not to try to get consent or why it was not appropriate to try to do so in the circumstances.

3.4 CONFIDENTIALITY

Another factor to be considered in assessing how reasonable a disclosure would be is whether a duty of confidence exists for the third party information. This would arise where information which is not generally available to the public (that is, genuinely 'confidential' information) has been disclosed to you with the expectation that it will remain confidential. This expectation might result from the relationship between the parties. A duty of confidence is characteristic of several types of relationships, for example, employment (trade secrets) legal (solicitor/client) and financial (bank/customer).

In most cases where a clear duty of confidence does exist, it will usually be reasonable to withhold third party information unless you have the consent of the third-party individual to disclose it. Where there is no duty of confidence, it will be reasonable in many cases to disclose third party information without consent. However, there will be circumstances where disclosure should not be made without consent even where the information to be disclosed is not confidential in nature, for example, where it is sensitive or where it is likely to cause harm.

3.5 INFORMATION GENERALLY KNOWN BY THE INDIVIDUAL MAKING THE REQUEST

If the third-party information has previously been provided to the individual making the request, is already known by them, or is generally available to the public, it will be more likely to be reasonable for you to disclose that information. It follows that third-party information relating to a member of staff (acting in the course of their duties), who is well known to the individual making the request through their previous dealings, would be more likely to be disclosed than information relating to an otherwise anonymous private individual.

Similarly, where the third-party individual is the source of the information held about the person making the request, there may be a strong case for their identification if the person needs to correct some damaging inaccuracy.

3.6 DISCLOSURE OR WITHHOLD?

If you have not got the consent of the third-party individual and you are not satisfied that it would be reasonable in all the circumstances to disclose the third-party information, then you should withhold it.

However, you are obliged to communicate as much of the information requested as you can without disclosing the identity of the third-party individual. So, disclosing the information with any third-party information edited or deleted [redacted] may be the best way to meet this request if you cannot disclose all the information.

You should ask the following key questions when dealing with subject access requests involving third party information:

- Does the information being accessed contain information about a third party?
- If so, would its disclosure reveal the identity of the third party?

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- In deciding this, has other information which the data subject has/may get been taken into account?
- To what extent can the information be edited so it can be given promptly without revealing the third party's identity?
- Has the third party previously given the information to the person making the request?
- If, or to the extent that, the information will identify the third party, has the third party consented to the disclosure?
- If not, should consent be sought?
- Is it reasonable to disclose the third-party information without consent?
- Is the third-party information confidential, sensitive or harmful?
- Is the third-party information of particular importance to the data subject

4 EXEMPTIONS

Several specific exemptions are set out in General Data Protection Regulation. There are other exemptions in regulations made under the GDPR (such as Third-Party Information).

Subject to these exemptions, any personal information held on the data subject is potentially disclosable in response to a subject access request. Unless a relevant exemption can be invoked, personal data may have to be disclosed.

The GDPR bundles several rights and duties into two groups, and the exemptions tend to work by “disapplying” (blocking) one or both of these groups. The two groups are the “subject information provisions” and the “nondisclosure provisions”.

The subject information provisions include an individual's right to make a subject access request. The following are the exemptions from the right of subject access that may have relevance to Wild About Play:

- Crime and Taxation
- Research, History & Statistics
- Regulatory Activity
- Publicly available information
- Disclosures require by law
- Legal advice and proceedings
- Confidential references
- Management information
- Negotiations
- Domestic purposes

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5 DATA SUBJECT REQUESTS TO UPDATE OR CORRECT PERSONAL DATA, RIGHT TO BE FORGOTTEN OR ERASURE

The GDPR requires personal data to be accurate (see [Keeping personal data accurate and up to date](#)). Where it is inaccurate, the individual concerned has a right to apply to the court for an order to rectify, block, erase or destroy the inaccurate information. In addition, where an individual has suffered damage in circumstances that would result in [compensation](#) being awarded and there is a substantial risk of another breach, then the court may make a similar order in respect of the personal data in question.

The same steps to follow are as detailed above for a subject access request and details kept of all requests made and what data was amended in the activity log.

6 DATA SUBJECT REQUESTS FOR THE RESTRICTION OF PROCESSING THEIR PERSONAL DATA

We may sometimes be able to restrict the use of an individuals' data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share the information in other ways while it is restricted. An individual can ask us to restrict the use of their personal information if:

- It is not accurate.
- It has been used unlawfully but they don't want us to delete it.
- It not relevant any more, but they want us to keep it for use in legal claims.
- They have already asked us to stop using their data but they are waiting for us to tell them if we are allowed to keep on using it.

The same steps to follow are as detailed above for a subject access request and details kept of all requests made and what data was amended in the activity log.

7 DATA PORTABILITY REQUESTS

An individual has the right to request that we send a copy of the personal data we hold about them to another organisation for their own purposes, for example when they are dealing with a different service provider.

If a request is made we will respond within one month after assessing whether or not this is possible, taking into account the technical compatibility with the other organisation in question.

This is unlikely to occur within Wild About Play.

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Data Protection Breach Reporting Procedure

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Data Breach Reporting Procedure

1 INTRODUCTION

1.1 BACKGROUND

The General Data Protection Regulation ("the GDPR") requires that Wild About Play ("the Club") provides evidence that appropriate procedures are in place for the handling of security incidents involving Personal Data. The purpose of this manual is to enable the club to measure their compliance against the law and GDPR guidance and to see whether information is handled correctly and protected from unauthorised access, loss, damage and destruction.

1.2 PURPOSE

The purpose of an incident response is to ensure that:

- Data breach events are detected, reported, categorised and monitored consistently;
- Incidents are assessed and responded to appropriately;
- Action is taken to reduce the impact of disclosure;
- Mitigation improvements are made and put in place to prevent recurrence
- Serious breaches are reported to the Data Processor and Information Commissioner
- Lessons learnt are communicated to the organisation as appropriate and can work to prevent future incidents

1.3 INTENDED AUDIENCE

The intended audience for this document is anyone involved in responding to security incidents.

It is assumed that the readership has a good understanding of the key aspects of privacy legislation and best practice when managing such incidents.

1.4 SCOPE

This procedure applies to all employees, trustees, suppliers, temporary staff, of the group who process personal data for which Wild About Play is either the data controller or has an interest in the personal data affected.

All staff have a role to play to ensure a safe and secure workplace.

1.5 TERMINOLOGY

In line with International Organisation for Standardisation (ISO) directive on the use of terminology in standards and for the avoidance of doubt the following words have the specific meanings ascribed below when used in this document:

- 'Shall' or 'Must' denote a mandatory requirement. Deviation from these shall constitute non-conformance
- 'Shall Not' or 'Must Not' denotes something that is prohibited
- 'Should' denotes a recommendation that is non-mandatory
- 'Should Not' denotes something that is not recommended
- 'May' denotes something that is optional.

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Data Breach Reporting Procedure

2 INCIDENT MANAGEMENT

2.1 DEFINITION

A Data Protection breach is the result of an event or series of events where Personally Identifiable Information (PII) is exposed to unauthorised or inappropriate processing that results in its security being compromised. The extent of damage or potential damage caused will be determined by the volume, sensitivity and exposure of the PII.

Breach management is concerned with detecting, reporting and containing incidents with the intention of implementing further controls to prevent the recurrence of the event.

Examples of common incidents are listed below:

Type	Example
Technical	Data Corruption Malware Corrupt Code Hacking
Physical	Break-ins to sites Thefts from secure sites Theft from unsecured premises Unescorted visitors into secure areas Loss in post
Human Resources	Data Input Errors Non-secure disposal of hardware or paperwork Unauthorised disclosures Inappropriate sharing

The proforma at Annex A is to be used for the reporting of ALL suspected data protection breaches

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2.2 MANAGEMENT STATEMENT OF INTENT

Breach management is concerned with detecting, reporting and containing incidents with the intention of implementing further controls to prevent the recurrence of the event.

Wild About Play shall:

- Put measures in place to ensure that awareness of data protection will enable breaches to be reported more easily
- Issue guidance on how to report PII breaches for analysis, categorisation and response
- Provide resource to analyse reported PII breaches to identify those that are incidents requiring a structured response
- Assemble breach response teams with a defined responsibility assignment matrix, as required, to contain and recover from security incidents
- Ensure that its contemporaneous logs of incidents are kept
- Hold periodic post resolution lessons learned meetings to focus on trends and improvements to reduce the likelihood and impact of recurrence, as appropriate.

Wild About Play recognises that in some instances PII breaches are beyond its reasonable control and the importance of being prepared for such eventualities.

Wild About Play shall ensure that it reacts appropriately to any actual or suspected PII breaches occurring either within the group and its systems or with data controllers.

Wild About Play recognises that a structured response to PII breaches has a number of clear benefits to it including:

- Improving overall PII security
- Reducing adverse business impacts
- Strengthening the PII breach prevention focus
- Strengthening prioritisation
- Strengthening evidence collection and custody arrangements
- Contributing to budget and resource justifications
- Improving updates to information governance risk assessment and risk management
- Providing PII security awareness and training material
- Providing input to PII security policy reviews via lessons learned.

2.3 OUTLINE PROCESS FOR INCIDENTS

Below shows the flow of actions involved in a PII Breach Investigation

Discovery > Identify > Assess > Investigate > Report > Learn

Discovery/Identify/Assess/Investigate - Breaches and weaknesses need to be reported at the earliest possible stage to the Risk Manager in the form of Annex A. Only in urgent circumstances, can incidents be reported in other ways.

Following notification, the Club Manager will open an incident log and make an initial assessment of the breach's severity. The trustees will be informed if deemed applicable.

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Data Breach Reporting Procedure

The reporting tool should capture most of the information needed to establish the scope of a breach but there will be a need to obtain additional information about the event, the assets affected, determining the type of incident, its category and priority before putting together an incident response team to manage the incident.

This is achieved by interviewing the key personnel involved in the breach and their managers and collecting as much information as possible to determine how the breach occurred, what actions have been taken, whether syndicators are involved and whether the data subjects have been notified.

Not all data protection breaches will result in formal action. Some will be false alarms or “near miss” events that do not cause immediate harm to individuals or the organisation. These should still be reported, as analysis of these will allow lessons to be learnt and continual improvement.

2.4 REPORTING

The objective of any breach investigation is to identify what actions the organisation needs to take to first prevent a recurrence of the incident and second to determine whether the incident needs to be reported to the Information Commissioner’s Office. The purpose of the report is to document the circumstances of the breach, what actions have been taken, what recommendations have been made and whether the disciplinary action process needs to be followed.

2.5 LESSONS LEARNED

Key to preventing further incidents is ensuring the group learns from an incident. Regular review meetings will take place chaired by the Club Manager to agree recommendations and each Breach Report will be shared with the trustees. These meetings should consider trends and identify opportunities for improvement.

2.6 REVIEW AND REVISION

This document will be reviewed as it is deemed appropriate, but no less frequently than every 12 months.

2.7 KEY MESSAGE

A culture in which data protection breaches are reported should be fostered. Although sanctions cannot be totally ruled out, the key objective is to develop valuable insight into how such events occur and staff need to be assured that reporting a breach will not in itself result in disciplinary action.

3 OUTLINE PROCEDURE FOR INCIDENT HANDLING

3.1 INVESTIGATION

Once a breach has been reported in the form of Annex A the following actions must be carried out by the Club Manager as soon as possible:

- Create an entry in the Data Breach Log using the information provided by the reporter
- Create a folder under Data Breaches using the following format – PB [Breach Reference Number]
- Start an investigation report and save it in this folder together with any emails/documents relating to the breach.
- Inform the trustees and prepare report for Breach Review Meeting if required.

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Data Breach Reporting Procedure

If the Club Manager decides that a report to the ICO is required, an initial report for the ICO should also be prepared and that they are notified within 72 hours. The Trustees and the Data Controller and/or Data Processor should also be notified.

Consideration must be given to notifying the individual(s) affected by the breach. Factors to consider include:

- Sensitivity of Information
- Volume of information
- Likelihood of unauthorised use
- Impact on individual(s)
- Feasibility of contacting individuals

Any notification must be agreed by the trustees and if required, legal services and communications. Begin investigation and complete report as soon as possible.

4 INCIDENT REVIEW

A key part of data protection breach management is a process of continual review. At least every three months the trustees meet to review current breaches. The purpose of these meetings is to provide an update on the progress of any investigation, discuss possible recommendations and consider whether specific incidents should be reported to the ICO.

5 RECOMMENDATIONS

Regardless of the type and severity of incident, there will always be recommendations to be made even if it is only to reinforce existing procedures. There are two categories of recommendation that can be made:

- Local – these apply purely to the department(s) affected by the incident and will usually reflect measures that need to be taken to restrict the chances of the same type of incident occurring.
- Corporate – some incidents will be caused by factors that are not unique to one department but can be found right across the organisation. Issues such as training, information handling and physical security affect all departments and it is essential that the organisation identifies such risks and puts in place measures to prevent the incident occurring elsewhere.

All recommendations will be assigned an owner and have a timescale by when they should be implemented which has a dual purpose. The first is to ensure that the organisation puts in place whatever measures have been identified and that there is an individual that can report back to the trustees on progress. The second is that where incidents are reported to the ICO, the group can demonstrate that the measures have either been put in place or that there is a documented plan to do so.

This is a recurrent theme of ICO enforcement and it's important that the group's procedures reflect this. Identifying recommendations is more than just damage control – the knowledge of what has happened together with the impact is a fundamental part of learning which can then be disseminated throughout the organisation and beyond.

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Data Breach Reporting Procedure

6 ANNEX A– DATA PROTECTION BREACH REPORTING FORM

The aim of this document is to ensure that in the event of a security incident such as data loss, all information can be gathered to understand the impact of the incident and what must be done to reduce any risk to syndicators/consumers and/or Wild About Play data and information and the individuals concerned.

The checklist can be completed by anyone with knowledge of the incident. It will also require review by the Club Manager who can determine GDPR implications and assess whether changes are required to existing business processes.

1. Summary of Incident	
Date and Time of Incident	
Number of people whose data is affected	
Department	
Nature of breach e.g. theft/ disclosed in error/technical problems	
Description of how breach occurred	
2. Reporting	
When was breach reported?	
How you became aware of the breach:	
Has the Club Manager been informed?	

Paxport

Data Breach Reporting Procedure

3. Personal Data	
Full description of personal data involved (without identifiers);	
Number of individuals affected:	
Have all affected individuals been informed:	
If not, state why not:	
Is there any evidence to date that the personal data involved in this incident has been inappropriately processed or further disclosed? If so, please provide details:	
4. Data Retrieval	
What immediate remedial action was taken:	
Has the data been retrieved or deleted? If yes - date and time:	
5. Impact	
Describe the risk of harm to the individual as a result of this incident:	
Describe the risk of identity fraud as a result of this incident:	

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Data Breach Reporting Procedure

Have you received a formal complaint from any individual affected by this breach? If so, provide details:	
6. Management	
Do you consider the employee(s) involved has breached information governance policies and procedures:	
Please inform of any disciplinary action taken in relation to the employee(s) involved:	
Had the employee(s) completed data protection training and if not why not:	
As a result of this incident, do you consider whether any other personal data held may be exposed to similar vulnerabilities? If so, what steps have been taken to address this:	
Has there been any media coverage of the incident? If so, please provide details	
What further action has been taken to minimise the possibility of a repeat of such an incident? Please provide copies of any internal changes in procedure:	

Wild About Play

Introduction

Wild About Play is an After School & Holiday Club based in Yate, South Gloucestershire.

This privacy notice sets out how Wild About Play will process personal data we collect from or about you, or which you provide to us.

Please read this Privacy Policy carefully to understand why data is being collected and what we do with that data one in our possession.

We may change the privacy policy of the terms of business from time to time by amending this page. Further information about data privacy may be found in our engagement letter with you.

The Club Manager is Sian Purnford who can be contacted on 07531 344 549 or wapridgewood@yahoo.co.uk.

On what basis can we process your information?

Data Protection law states we are allowed to use personal information only if we have a proper reason for doing so. This includes sharing it outside Wild About Play. The law states we must have one or more reasons for processing it:

- to fulfil a contract we have with you, or
- when it is our legal duty, or
- when it is in our legitimate interest, or
- when you consent to it

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. For example we will send out Newsletters informing you of the club's activities and news.

What type of information we collect from you?

What we use your personal information for

- to manage our relationship with you
- to develop new ways to meet our customers' needs and to grow our business
- to develop and carry out marketing activities
- to provide guidance or advice about our service
- to develop and manage our products and service
- to make and manage customer payments
- to collect and recover money that is owed to us
- to manage risk for us and our customers
- to obey laws and regulations that apply to us (e.g. Ofsted, Insurance companies)
- to respond to complaints and seek to resolve them
- to run our business in a proper and efficient way which includes managing our financial position, business capability, planning communications, audit and governance

Wild About Play

Data from third parties we work with:

- Companies that introduce you to us
- Card associations
- Social networks
- Public information sources such as Companies House
- Government and law enforcement agencies

How long we keep your data for

We will keep your personal information for as long as you are a customer or employee of Wild About Play.

After you stop being a customer or employee, we may keep your data for up to 15 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 15 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

As regards the recruited applicants whose data are stored in their personal file, the retention period of their data related to the selection procedure follows the period of storage of the personal file, which is six years.

The retention period for data relating to the non-recruited applicants, and unsolicited personal data, the documents related to these candidates are kept for a period of six months after which time they are destroyed.

Who your information will be shared with

We may share your personal information with these organisations:

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators and other authorities
- Companies we have an agreement to co-operate with
- Companies you ask us to share your data with
- Our professional indemnity insurer in the event a claim is made against us in order to defend ourselves.

We may need to share your personal information with other organisations to provide you with the service you have chosen:

- Payroll software/companies (for employees)
- Book Keeper services

We may also share your personal information if the make-up of Wild About Play changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.



Moving your information to another organisation

You have the right to request that we send a copy of the personal data we hold about you to another organisation for your own purposes, for example when you are dealing with a different service provider. If you would like us to move, copy, or transfer your information to another organisation please let us know. We will respond to you within one month after assessing whether or not this is possible, taking into account the technical compatibility with the other organisation in question.

Automated decision making

We do not use your information for automated decision making.

Complaints about the use of your personal data

If you wish to raise a complaint on how we have handled your personal data and have the matter investigated please make contact with Wild About Play Manager, Sian Purnford on 07531 344 549 or wapridgewood@yahoo.co.uk.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office. Find out on their website how to [report a concern](#).

Cookies

To find out more about how we use cookies please see our Cookie notice on our website.

WILD ABOUT PLAY

- to exercise our rights set out in agreements or contracts
- DBS Checks (for employees)

Where we collect personal information from

We may collect personal information about you from these sources:

Data you give to us:

- When you apply for our services – Membership Form
- When you talk to us on the phone or at the club
- When you use our website
- In emails and letters
- In customer surveys
- When you apply for vacancies directly
- When you send us unsolicited personal data

Data we collect when you use our service. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Data we collect about the children when you use our service. This includes the amount, frequency, type, location, origin and recipients:

- Health Care Plan forms
- Behaviour Plans
- Accidents and Incident logs
- Administering Medicine forms
- Any other information relating to the child deemed by staff or parents/carers to be relevant and significant
- Permission to go home alone where appropriate according to arrivals and departure policy
- Safeguarding Incident Form – where appropriate
- Permission for the use of marketing and photographs
- Permissions for trips and some activities

Wild About Play

Data from third parties we work with:

- Companies that introduce you to us
- Card associations
- Social networks
- Public information sources such as Companies House
- Government and law enforcement agencies

How long we keep your data for

We will keep your personal information for as long as you are a customer or employee of Wild About Play.

After you stop being a customer or employee, we may keep your data for up to 15 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 15 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

As regards the recruited applicants whose data are stored in their personal file, the retention period of their data related to the selection procedure follows the period of storage of the personal file, which is six years.

The retention period for data relating to the non-recruited applicants, and unsolicited personal data, the documents related to these candidates are kept for a period of six months after which time they are destroyed.

Who your information will be shared with

We may share your personal information with these organisations:

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators and other authorities
- Companies we have an agreement to co-operate with
- Companies you ask us to share your data with
- Our professional indemnity insurer in the event a claim is made against us in order to defend ourselves.

We may need to share your personal information with other organisations to provide you with the service you have chosen:

- Payroll software/companies (for employees)
- Book Keeper services

We may also share your personal information if the make-up of Wild About Play changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.

WILD about PLAY

- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If a change to our club happens, then other parties may use your data in the same way as set out in this notice.

Security of your data

Information and records held on children are kept in a locked file, access to which is restricted to the Manager and members of staff where necessary. Systems are in place to safeguard confidential information kept on computer. Where possible any identifiable information will be encrypted or minimised.

Sending data outside of the EEA

We do not send data outside of the EEA

How you can access and update your information

You have a right to request a copy of the personal information we hold about you, known as a data subject access request. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first told us, is updated or removed. These requests are free of charge and can be sent to Wild About Play Manager, Sian Pumford at wapridgewood@yahoo.co.uk

How you can object to us using your personal data

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data or ask us to delete it or restrict how we use it or, please contact us.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain services to you. If this is so, we will tell you.

Documentation and Information

The Club recognises the importance of maintaining up to date and accurate records, policies and procedures necessary to operate safely, efficiently and in accordance with the law.

The Club is also aware of its obligations with regard to the storing and sharing of information under the Data Protection Act 1998, and is committed to complying with its regulations and guidance.

The Manager and staff are aware of the implications of the Data Protection Act 1989 in so far as it affects their roles and responsibilities within the Club.

The Club is committed to a policy of openness with parents/carers with regard to its policies and procedures and the information that we hold on their child. Records and information will be made available to parents/carers on written request unless subject to an exemption. If for any reason a request is going to be refused, then this decision, and its explanation, will be communicated in writing.

Information and records held on children will be kept in a locked file, access to which will be restricted to the Manager and members of staff where necessary. Systems are in place to safeguard confidential information kept on computer.

The Manager has overall responsibility for the maintenance and updating of children's records and ensuring that they are accurate. Registration and medical forms will be renewed when information changes and generally on an annual basis.

The club will keep records about the children. These include:

- Health Care Plan forms
- Behaviour Plans
- Accidents and Incident logs
- Administering Medicine forms
- Membership Forms
- Any other information relating to the child deemed by staff or parents/carers to be relevant and significant
- Permission to go home alone where appropriate according to arrivals and departure policy
- Safeguarding Incident Form – where appropriate
- Permission for the use of photographs
- Permissions for trips and some activities

Staff Records

Additionally, and in accordance with our policies and procedures, an up to date record of all staff, students and volunteers who work at the Club will be stored and maintained onsite by the Manager.

Staff/Volunteer Suitable Person folders shall contain

- Evidence of DBS check ie disclosure number and date of issue
- Application forms and references
- Copies of certificates of relevant training and qualifications
- Emergency contact numbers
- Up to date name; address; telephone number
- Employment details

Other staff documentation may include:

- Any other information (such as Appraisals and Personal Development Action Plans) during their time spent working at the Club.

Documents and Records

- A comprehensive set of policies and procedures as required by the Statutory Framework for the Early Years Foundation Stage and/or Childcare Register (Compulsory or Voluntary) that are reviewed when appropriate
- A Self Evaluation folder completed and contributed to by all staff
- A record of any other individuals who regularly visit/spend time at the Club including their contact details
- Visitors Book
- The daily attendance registers
- An up to date waiting list of all children waiting for a place at the Club
- Records of the play and activities planned and implemented by the Club, including any offsite visits and outings
- Records of any medication being held by staff on behalf of children, along with the signed Administering Medicines Form
- Records of signed emergency medical treatment Consent (found on each child's Membership Form), giving parental authorisation for staff to consent to emergency treatment for children (in accordance with the Health, Illness and Emergency policy)
- Provider Complaints Log completed by the Manager and details of any complaints made
- An Inventory Record of all equipment owned or used by the Club, including safety checks and repairs carried out
- Ofsted Registration certificate (which must be displayed at all times)
- Public Liability and Employer's Liability Insurance certificate/s and information (which we display at all times)
- Accident/Near Misses and Incident/Safeguarding Report sheets
- Fire Drill Log
- Risk Assessments and Daily (Health and Safety) checks
- Notification of Changes to Ofsted

The Club recognises its responsibilities in keeping children, parents/carers, staff and Ofsted informed of any changes to the running or management of the Club that will directly affect them.

Wherever possible, if changes are to be made affected parties will be given as much warning as possible. In the case of proposed changes that are of considerable importance, the Club will facilitate consultation with the affected groups or individuals.

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In the following cases, it is a legal requirement for the Club to notify Ofsted at the earliest possible opportunity:

- Any changes in the registration or Management of the Club
- Any significant change to the premises such as building work or reduced space
- Any allegation of abuse by a member of staff or volunteer or any abuse, which is alleged to have taken place on the premises
- Change of name or address
- Change in the hours the Club operates
- Serious accidents or injuries sustained at Club
- Any allegations against staff or the Manager
- Any concerns regarding staff suitability to care for or be in regular contact with children
- Any other significant events

Emergency Contact Details

The Club will keep an up to date copy of emergency contacts for a staff member to access in the event of an emergency (such as a road traffic accident whilst being on a trip or outing)

Environmental Policy

The Club is committed to promoting environmentally friendly practice to help reduce pollution, emissions and waste.

Staff will be made aware of how to reduce the use of raw materials, supplies and energy through the staff induction process and continued participation.

Awareness will be raised with the children through discussion, projects and routine systems within the Club.

- Scrap paper and junk will be re-used for craft activities where safe and appropriate. In other cases these will be recycled appropriately.
- Recycling bins will be easily accessible to the children and staff to enable recycling to happen.
- Where possible, lights will be fitted with energy saving bulbs and switched off when not needed.
- Water will not be wasted.
- When taking children on trips, the Club will endeavour to use public transport or minibuses rather than cars. Routes will be planned to save unnecessary vehicle use.
- Electrical equipment will be turned off at the source of power when not in use (standby mode will not be used)
- The heating system will be serviced regularly by a qualified engineer to ensure it operates safely and economically (in line with our premises lease).
- Hazardous waste such as computer monitors, televisions and other electrical equipment is to be disposed of at appropriate waste management sites.
- Where appropriate and possible, the Club will participate with local organisations, collections and special events which raise awareness, offer waste solutions and free advice.
- Partnerships with other Clubs will be developed to help sustain environmentally friendly systems.
- Bristol Scrapstore will be used as a supplier so that safe recyclable materials are used instead of creating more landfill waste
- We will always endeavour to consider how to and who might, reuse the waste produced by the Club.

Equal Opportunities

The Club is committed to taking positive and proactive steps to ensure that we provide a safe and caring environment, free from discrimination, for everyone in our community including children with additional needs.

The Club equal opportunities procedures aim to help everyone involved in the Club to counteract and eliminate both direct and indirect discrimination in decision-making, employment practices and service provision and to ensure that our services strive to achieve equality of opportunity for all.

The Club aims to provide a welcoming and caring environment that promotes and reflects cultural and social diversity and is equally accessible to all.

The Club will endeavour to challenge any offensive behaviour, language or attitudes with regards to race, age, sex, marriage or civil partnership, pregnancy or maternity, ethnicity, nationality, class, religion or belief, culture, gender, gender reassignment, language, sexual orientation and disability, as protected under the Equality Act 2010.

The Club recognises that achieving the objectives of our equal opportunities policy relies on the active involvement of parents/carers, as set out in the Partnership with Parents/Carers policy. As such, the Club will both welcome and encourage parents and carers to get involved in the running and management of the Club, and to comment on the effectiveness of its policies and procedures.

The Club will facilitate regular opportunities for consultation with parents/carers about the service that the Club provides, as a means of monitoring the effectiveness of the Equal Opportunities policy.

Equal Opportunities Procedures

To realise the Club's objective of creating an environment that is free from discrimination and welcoming to all, the Club will:

- Ensure that its services are open and available to all parents/carers and children in the local community
- Ensure that issues of race, age, sex, marriage or civil partnership, pregnancy or maternity, ethnicity, nationality, class, religion or belief, culture, gender, gender reassignment, language, sexual orientation and disability do not inhibit a child from accessing the Club's services
- Treat all children and their parents/carers with equal concern and value
- Have regard for promoting understanding, respect and awareness of diversity and equal opportunities issues in planning and implementing the Club's programme of activities
- Help all children to celebrate and express their cultural and religious identity by providing a wide range of appropriate resources and activities
- Ensure that the Club's recruitment policies and procedures are open, fair and non-discriminatory
- Endeavour to recruit a staff team that reflects the make-up of the Club's local community
- Ensure that all members of staff are aware of, and understand, the Equal Opportunities policy as it relates to all aspects of its work

- Encourage and support staff to act as positive role models to children by displaying and promoting tolerant and respectful behaviours, language and attitudes and challenging any discriminatory incident, according to the provisions set out in the Staff Disciplinary Procedures, the Behaviour Management, and Dealing with Racial Harassment policies
- Treat seriously any member of staff found to be acting, or have been acting, in a discriminatory way, according to the provisions of the Staff Disciplinary Procedures policy
- Work to fulfil the legal requirements of the Equality Act 2010 and the Human Rights Act 1998.

The Manager will ensure a delegated person attends Equal Opportunities Training so that an ENCO is in place. The ENCO is responsible for ensuring that the Equal Opportunities policy is implemented and that its effectiveness is regularly monitored.

They will be responsible for ensuring that:

- Staff receive appropriate training
- The Equal Opportunities policy is consistent with current legislation and guidance
- Appropriate action is taken wherever discriminatory behaviour, language or attitudes become apparent
- The Club's policies and procedures will be kept under review to ensure they do not operate in a discriminatory manner or in any way against its commitment to equal opportunities.

British Values

The Club is committed to supporting British Values.

At the Club staff know the importance of child engagement as part of the community and are fully aware that disengagement, intolerance and racial hatred can lead to children being drawn into Terrorism. All staff are fully trained in Prevent Duty and the importance of British Values is understood within the Club.

The staff will carry out a number of activities and will role model and teach a variety of standards that are valued and promoted at Club:

1. Respect - Staff will listen, respect and value each child's views and opinions and gain an awareness of the British law
2. Democracy - Staff will demonstrate the British Value of democracy - allowing the children to decision make and vote for resources, trips and snack food etc
3. Diversity - Staff will help the children to understand that we are all different yet all accepted as part of the community
4. Manners - Having good manners is very important at Club and children will be encouraged to take their turn/queue, say please and thank you and show respect to everyone at all times.
5. As well as exploring a host of other multi-cultural festivals, the Club will also be proud of and celebrate the British traditions that the country holds such as Christianity, Christmas, fish and chips and our Monarchy.

These British Values will be worked into everyday Club life as well as being incorporated into our activity themes and play ideas.

Dealing with Racial Harassment

The Club is committed to promoting tolerance and fairness towards all members of staff, students, volunteers, children and parents/carers. We fully and wholeheartedly adhere to the spirit and detail of the Equality Act 2010 which outlaws discrimination against anyone on grounds of race, colour, nationality or ethnicity.

Preventing Racial Harassment and Discrimination

Proactive steps can be taken to prevent racial harassment and discrimination, and the Club believes that this is more effective than tackling a situation once it has already occurred. Therefore, alongside the procedures outlined later in this policy to deal with incidents of racial harassment and discrimination,

The Club will:

- Ensure that all children are valued, irrespective of their race, colour, nationality or ethnicity
- Encourage individuals to treat each other with respect, regardless of their race, colour, nationality or ethnicity
- Acknowledge the existence of racism in society and take steps to promote harmonious race relations in our community
- Promote good relations between different ethnic groups and cultures within the Club and in the wider community
- Ensure that different cultural and religious needs are met, understood and communicated to all individuals involved in the Club

Examples of Racial Harassment and Discrimination

Racial harassment and discrimination can manifest itself in a variety of ways, some overt and others much less so. Some examples of unacceptable behaviour include:

- The use of patronising words or actions towards an individual for racial reasons - including name calling, insults and racial jokes
- Threats made against a person or group of people because of their race, colour, nationality or ethnicity
- Racist graffiti or any other written insults or the distribution of racist literature
- Physical assault or abuse against a person or group of people because of their race, colour, nationality or ethnicity

Addressing Racial Harassment and Discrimination

If a member of staff or a child becomes aware of an incident of racial harassment or discrimination occurring at the Club, they will be encouraged to report the incident to the Manager or other senior member of staff.

Any allegation made against a member of staff or a child will be investigated thoroughly. The individuals concerned will be involved in discussion about why such behaviour cannot be tolerated. The Greenfield Club will make every effort to support all those involved in the incident and find ways to increase understanding and tolerance.

Each incident will be fully investigated and details will be recorded in a separate section of the Incident Record Sheet.

In the case of children, incidents will be reported to their parent/carer and a course of action agreed upon to resolve the situation, in accordance with the provisions of the Behaviour Management policy. However, if a solution cannot be found, then the Club may have to inform the child - and their parent/carer - that they are no longer able to attend sessions, in accordance with the Suspensions and Exclusions policy.

In the case of staff, provisions within the Staff Disciplinary Procedure policy will be activated and a record of the incident will be kept and made available to statutory authorities if appropriate.

The Manager is responsible for ensuring that all incidents are handled both professionally and sensitively.

All incidents will be kept confidential. In cases where the Manager is involved in an allegation, the named Deputy will handle the incident, or nominate a senior member of staff in their place.

In all cases, continued racial harassment or discrimination from any individual will result in exclusion from the Club, where all other efforts have failed to provide a satisfactory resolution.

The Club as an Employer

As an employer, the Club is committed to ensuring that the workforce reflects the multicultural community that it serves. To this end, the Club will:

- Advertise job vacancies in a variety of media sources and outlets and in a variety of places
- Ensure that our human resource procedures prohibit racial discrimination and harassment, and investigate any concerns when this is suspected of failing
- Investigate any allegation of racial discrimination or harassment according to the provisions of the Staff Disciplinary Procedures and Behaviour Management policies
- Collect and monitor information about the ethnic background of the staff team and children

3.67 Children with Special Educational Needs and/or Additional Needs

The Club is aware that some children have additional needs and/or physical disabilities that require particular support and assistance. We are committed to having appropriate arrangements in place to ensure that all children are able to access our services, made to feel welcome, and that our activities promote their welfare and development.

The Club is committed to the inclusion of all children in its care. The Club also believes that children with additional needs and/or physical disabilities have a right to play, learn and be able to develop to their full potential alongside other children.

Whenever possible, children with additional needs and/or physical disabilities will have access to the same facilities, activities and play opportunities as their peers. Everybody stands to gain if all children are allowed to share the same opportunities and are helped to overcome any disadvantages that they may face.

The policies, procedures and practices of the Club in relation to children with additional needs and/or physical disabilities are consistent with current legislation and guidance. These include the Special Educational Needs and Disability Act 2001 and the Equality Act 2011. The Club believes that by identifying individual needs and taking proactive steps alongside parents/carers and other statutory professionals or agencies, all children should be able to play a full, active and equal part in the Club's activities.

SENCO (Special Educational Needs Coordinator)

The Manager may appoint a member of staff as the SENCO to manage provision for children with special educational needs and/or physical disabilities. The coordinator's responsibilities will include:

- Working alongside the Manager to ensure that all staff are aware of all legislation, regulations and other guidance on working with children with additional needs and/or physical disabilities
- Working with the Manager to ensure that all staff who work with children with additional needs and/or physical disabilities and have appropriate skills and training
- Coordinating regular monitoring and reviews of children's progress: involving parents/carers, other members of staff, relevant representatives from statutory agencies and, if appropriate, the child themselves. Alongside the Manager, they will also be responsible for ensuring that any actions following such reviews are followed through
- Assessing each child's specific needs and adapting the Club facilities, procedures, practices and activities as appropriate
- Ensuring that all systems are in place to adequately plan, implement, monitor, review and evaluate the Additional Needs Policy
- Ensuring that children with additional needs and/or physical disability are fully considered when activities are being planned and prepared
- Liaising with parents/carers about the needs of their children and the plans and actions of The Club, as well as being the point of contact for parents/carers
- Liaising with other agencies and seeking advice, support and training for themselves and other staff as necessary
- Supporting other members of staff to become more skilled and experienced in the care of children with additional needs and/or physical disabilities
- Ensuring that all children are treated with equal concern and respect and are encouraged to take part in all activities
- Ensuring that accurate observations of how the child or young person uses the play space are used to reflect on practice and improve access for all
- Ensuring that the child or young person is fully consulted and independence is encouraged when possible. Consideration will always be given to the dignity and choice of the individual and where necessary staff will seek strategies to enable good communication at all times.

Intimate Care

Settings that work with young children or children/young people* who have intimate care needs will require staff to be respectful of children's needs.

Intimate care can be defined as care tasks of an intimate nature, associated with bodily functions, body products and personal hygiene which demand direct or indirect contact with or exposure from the genitals. Examples include care associated with continence and menstrual management as well as more ordinary tasks such as help with washing or bathing.

Children's dignity will be preserved and a high level of privacy, choice and control will be provided to them.

Staff who provide intimate care to children have a high awareness of Safeguarding Children issues. Staff behaviour is open to scrutiny and staff at the club work in partnership with parents/carers to provide continuity of care to children/young people wherever possible.

The Club is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. The Club recognises that staff must treat all children with respect when intimate care is given. No child should be attended to in a way that causes distress or pain.

Our Approach to Best Practice

All children who require intimate care are treated respectfully at all times: the child's welfare and dignity is of paramount importance.

Staff who provide intimate care are trained to do so (including Safeguarding Children and Health and Safety training in moving and handling) must be fully aware of best practice. Apparatus will be provided to assist with children who need special arrangements following assessment from physiotherapists/occupational therapist as required.

Staff will be supported to adopt their practice in relation to the needs of individual children taking into account developmental changes such as the onset of puberty and menstruation.

There is careful communication with each child who needs help with intimate care in line with their preferred means of communication (verbal, symbolic, etc) to discuss the child's needs and preferences. The child is aware of each procedure that is carried out and the reason for it.

As a basic principle children will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each child to do as much for themselves as they can. This may mean, for example, giving up the child responsibility for washing themselves. Individual intimate care plans will be drawn up for particular children as appropriate to suit the circumstances of the child. These plans include a full risk assessment to address issues such as moving and handling, personal safety of the child and the carer and health.

Each child's right to privacy will be respected. Careful consideration will be given to each child's situation to determine how may carers might need to be present when a child needs help with intimate care. Where possible, one adult will care for one child unless there is a sound reason for having two adults present. If this is the case, the reasons should be clearly documented.

Wherever possible the same child will not be cared for by the same adult on a regular basis; there will be a rota of carers known to the child who will take turns in providing care. This will ensure, as far as possible, that over-familiar relationships are discouraged from developing, while at the same time guarding against the care being carried out by a succession of completely different carers.

Parents/carers will be involved with their child's intimate care arrangements on a regular basis: a clear account of the agreed arrangements will be recorded on the child's care plan. The needs and wishes of children and parents will be carefully considered alongside any possible constraints, eg staffing and equal opportunities legislation.

Each child/young person will rely on the Manager to act as an advocate to whom they will be able to communicate any issues or concerns that they may have about the quality of care they receive.

The Protection of Children

The Local Children's Safeguarding Board – 'Recognising The Signs of Child Abuse' and the DCSF 'What To Do If You Think A Child is Being Abused' booklets will be accessible to staff and adhered to. Where appropriate, all children will be taught personal safety skills carefully matched to their level of development and understanding.

If a member of staff has any concerns about physical changes in a child's presentation, eg marks, bruises, soreness etc, s/he will immediately report concerns to the Manager/Play Leader for safeguarding children and the children's safeguarding policy will be followed.

If a child becomes distressed or unhappy about being cared for by a particular member of staff, the matter will be looked into and outcomes recorded. Parents/carers will be contacted at the earliest opportunity as part of this process in order to reach a resolution. Staffing schedules will be altered until the issue(s) are resolved so that the child's needs remain paramount. Further advice will be taken from outside agencies if necessary.

Allegations made Against a member of staff

If a child makes an allegation against a member of staff, all necessary procedures will be followed, including following the 'Allegations against a member of staff' procedure which should include contacting the local Social Services department/First Point Team/LADO (Local Area Designated Officer).

Dealing with Bodily Fluids/Waste

Spillages of substances likely to result in the spread of infections will be dealt with rapidly and carefully. Blood, vomit, urine and faeces will be cleaned up immediately and disposed of safely and hygienically by double bagging and taken out of the setting. Staff will wear disposable plastic gloves and an apron and wash themselves thoroughly afterwards. Children will be kept well clear while such substances are being dealt with. The relevant Health and Safety procedures shall be followed by staff so that any the spread of germs is prevented, especially when using cleaning equipment.

The Manager and staff are committed to taking all practicable steps to prevent and control the spread of infectious germs, and to uphold high standards of personal hygiene in order to minimise the risk of catching or spreading infection.

Guidance and Model Policy for Intimate Care

Part 1 Guiding Principles

Part 2 Model Policy for Intimate Care

Part 3 Guidance

Part 4 Appendix 1 - Intimate Care Plan and Guidance for use

Part 1

Guiding Principles

These three fundamental guiding principles are paramount and should be evident whenever intimate care involving children or young people is considered.

1st Principle

The exchange between all those involved in any intimate care procedures must be one of mutual respect.

2nd Principle

Every plan supporting a child/young person can be enabled to develop their autonomy.

3rd Principle

The number of adults engaged in the care should be no more than the minimum needed to perform the task safely and respectfully. Each situation should reflect both the safety and vulnerability of child/young people and staff.

Part 2

Model Policy for Intimate Care

Introduction

The Club is committed to ensuring that all staff responsible for the intimate care of children or young people will undertake their duties in a professional manner at all times. We recognise that there is a need to treat all children/young people with respect when intimate care is given. No child/young person should be attended to in a way that causes distress, embarrassment or pain.

What is Intimate Care?

Intimate care is any personal care that most people usually carry out for themselves.

Our Approach to Best Practices

The management of all children/young people with intimate care needs will be carefully planned and should be a positive experience for all involved. The child/young person who requires intimate care is treated with respect at all times; the child's welfare and dignity is of paramount importance.

Staff who provide this care are trained to do so (including Safeguarding and Child Protection and Moving and Handling Training) and are fully aware of best practice. Suitable equipment and facilities will be provided to assist with children/young people who need special arrangements following assessment from a physiotherapist/occupational therapist.

Staff will be supported to adapt their practice in relation to the needs of individual children/young people taking into account developmental changes such as puberty, eg menstruation.

Children/young people will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will ensure each child/young person does as much for him/herself as he/she can.

This may mean, for example, giving the child responsibility for washing themselves. Individual intimate care plans will be drawn up as appropriate and shared and agreed by the child/young person and their parents/carers.

Intimate Care Plans should highlight particular areas of risk and sensitivity. Each child/young person's right to privacy will be respected. Careful consideration will be given to each situation to determine how many carers need to be present when the child/young person is being cared for.

Where possible one child will be catered for by one adult unless there is a sound reason for having more adults present. In this case, the reasons should be clearly documented and reassessed regularly.

Wherever possible staff should only care intimately for an individual of the same sex. However, in certain circumstances this principle may need to be waived where failure to provide appropriate care would result in negligence, for example female staff supporting boys when there is no male staff.

Intimate care arrangements will be discussed with parents/carers on a regular basis and recorded on the care plan. The needs and wishes of children/young people and parents will be taken into account wherever possible within the constraints of staffing and equal opportunities legislation.

Part 3 **Guidance**

Context

The purpose of this guidance is to set out a framework for staff that provide intimate care to children and young people. This acknowledges staff responsibilities and also protects the rights of everyone involved.

Children and young people who require intimate care may attend any setting.

Young people are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Adults need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the children and young people with whom they work.

Purpose of Guidance

It is important that all adults working with children and young people understand that the nature of their work and the responsibilities related to it place them in a position of trust. This guidance provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts. This guidance aims to:

- Keep children and young people safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided
- Assist adults working with children and young people to work respectfully, safely and responsibly and to monitor their own standards and practice
- Support managers and employers in setting clear expectations of behaviour and/or codes of practice relevant to the service being provided.
- Support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken
- Support safer recruitment practice
- Minimise the risk of misplaced or malicious allegations made against adults who work with children and young people.
- Reduce the incidence of positions of trust being abused or misused
- Support staff to respectfully and safely teach or consolidate autonomy for the children or young people with whom they work. Staff will enable each child or young person to do as much for themselves as possible.

Employers should be familiar with, and know how to access, their Local Safeguarding Children's Board's policy and procedures for managing allegations against staff. This guidance is available in Working Together to Safeguard Children, Chapter 12 and Safeguarding Children and Safer Recruitment in Education, Chapter 5.

What is Intimate Care?

Intimate care encompasses areas of personal care, which most people usually carry out for themselves but come people may be unable to do so because of an impairment or disability. Children or young people might require help with eating, drinking, washing, dressing, toileting and helping to deal with menstruation.

What is Invasive Care?

Invasive care is an aspect of personal care where a procedure used for the care of an individual involves a further proximity to a person's body. This is to the point where equipment or medication needs to enter the body space, for example, medication administered orally or by injection. These are medical procedures and can only be undertaken in a school/setting by an appropriately trained person. These procedures need to be supported by a clear medical protocol endorsed by the supporting Health Professional.

Good Practice in Intimate Care

Wherever possible, intimate care provided to older children and young people should be carried out by a staff member of the same gender. The religious and cultural values of children and their families must also be taken into account.

The following positive approaches will assist in promoting good practice for intimate care:

- Staff should get to know the child or young person well beforehand and be familiar with his/her moods and methods of communication
- Staff should speak to the child personally by name so that he/she is aware of being the focus of the activity
- Staff should have knowledge and understanding of any religious and cultural sensitivities related to aspects of intimate care and take these fully into account
- Staff should enable the child or young person to be prepared for or anticipate events while demonstrating respect for his/her body, eg by giving a strong sensory or verbal cue such as using a sponge or pad to signal intention to wash or change
- Staff should ensure that the child or young person's privacy and modesty is respected and protected

- Staff should agree with the child or young person and their family appropriate terminology for private parts of the body and functions. Best practice in personal safety work would be to use the correct anatomical names for intimate body parts
- Staff must always communicate in an age appropriate way taking into account the child or young person's developmental level and their preferred communication method.
- Staff should keep records, which note a child or young person's responses to intimate care and any changes in behaviour
- If a member of staff has concerns about physical changes in a child or young person's presentation, eg unusual anxiety, bruising, soreness etc they will immediately report their concerns to the designated person for child protection and log them
- An appropriate written plan for intimate personal care should be agreed with the child or young person and their family

Duty of Care

The Children Act 2004, through the Staying Safe outcome of the Every Child Matters Change for Children programme, places a duty on organisations to safeguard and promote the well being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in these organisations are competent, confident and safe to do so.

All adults who come into contact with children and young people whether working in a paid or unpaid capacity have a duty to care to safeguard and promote their welfare. Children and young people have a right to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well being of children and young people. Failure to do so may be regarded as neglect.

The duty of care is in part, exercised through the development of respectful and caring relationships between adults and children and young people. It is also exercised through the behaviour of the adult, which at all times should demonstrate integrity, maturity and good judgement.

Employers also have a duty of care towards their employees, both paid and unpaid, under the Health and Safety at Work Act 1974. This requires them to provide a safe working environment for adults and provide guidance about safe working practices. Employers also have a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances. The Human Rights Act 1998 sets out important principles regarding protection of individuals from abuse, by state organisations or people working for those institutions. Adults who are subject to an allegation should therefore be supported and the principles of natural justice applied.

The Health and Safety Act 1974 also imposes a duty on employees (5) to take care of themselves and anyone else that may be affected by their actions or failings. An employer's duty of care and the adult's duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of these guidelines.

One to One Situations

All settings working with or on behalf of children and young people should consider one to one situations when drawing up their policies.

Always consider the 3rd Guiding Principle: The number of adults engaged in the care should only reflect the minimum needed to perform the task safely and respectfully.

It is not realistic to state that one to one situations should never take place. It is however, appropriate to state that where there is a need, agreed with the Manager /Play Leader and/or parents/carers, for

an adult to be alone with a child/young person, certain procedures and explicit safeguards must be in place.

Adults should be offered training and guidance for the use of any areas of the workplace, which may place themselves or children in vulnerable situations. This would include those situations where adults work directly with children and young people in unsupervised settings and/or isolated areas.

One to one situations have the potential to make children/young people more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one situations with children/young people may also be more vulnerable to unjust or unfounded allegations being made against them.

Both possibilities should be recognised so that when one to one situations are unavoidable, reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of children and young people and the adults who work with them.

There are occasions where the Manager will need to undertake a risk assessment in relation to the specific nature and implications of one to one work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis.

Underpinning Values

- The welfare of the child is paramount
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This responsibility extends to a duty of care for those adults employed, commissioned or contracted to work with children and young people
- Adults who work with children are responsible for their own actions and behaviour and should avoid any conduct that would lead any reasonable person to question their motivation and intentions
- Adults should work and be seen to work in a respectful, open and transparent way
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document
- Adults should ensure that where a child or young person attends different settings that there is consistency in dealing with this aspect of intimate care

Underpinning Principles

Intimate care should be a positive experience for both staff and the child or young person. It is essential that care is given gently, respectfully and sensitively and that every child or young person is treated as an individual. As far as possible, the child or young person should be allowed to exercise choice and should be encouraged to have a positive image of his/her own body.

These principles of intimate care can be put into practice by:

- Ideally allowing the child or young person, whenever possible to choose who provides their intimate care which should be age appropriate
- Enabling the child or young person to indicate if they find a carer unacceptable
- Allowing the child or young person a choice and control over the sequence of care
- Ensuring privacy wherever the intimate care is taking place
- Allowing the child or young person to care for him/herself as far as possible
- Being aware of and responsive to the child/young person's reactions

All children have a right to safety, privacy and dignity when contact of a physical or intimate nature is

required and depending on their abilities, age and maturity should be encouraged to act as independently as possible. The decision as to whether or not a door is locked when intimate care is taking place needs to be considered.

The following are some of the factors that might be taken into account:

- Age, ability and wishes of the child/young person
- Location of the facility, eg school hygiene room, public toilet etc
- Safe working practice of the adult(s) involved

The views of the child should be actively sought, wherever possible, when drawing up and reviewing intimate care plans. As with all individual arrangements for intimate care needs, arrangements between the child/young person, parents/carers and the school/setting must be negotiated and recorded.

When the plan is completed consideration should be made as to whether the underpinning values and principles are reflected.

Given the right approach, intimate care should provide opportunities to teach children about the value of their own bodies, to develop their personal safety skills and to enhance their self-esteem. Whenever children can learn to assist in carrying out aspects of their own intimate care they should be encouraged to do so.

Confidentiality

Adults may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. These details must be kept confidential at all times and only shared when it is in the interests of the child/young person to do so. Such information must not be used to intimidate, humiliate, or embarrass the child/young person concerned.

If an adult working with children or young people is in any doubt about whether to share information or keep it confidential he or she should seek guidance from a senior member of staff or the designated person for child protection. Any actions should be in line with locally agreed information sharing protocols.

The storing and processing of personal information about children and young people is governed by the Data Protection Act 1998. Employers should provide clear advice to adults about their responsibilities under this legislation.

Whilst adults need to be aware of the need to listen and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child or young person under any circumstances.

Additionally, concerns and allegations about adults should be treated as confidential and passed to the designated child protection person without delay.

It is important that the child/young person and their family have a copy of the intimate care plan and any other linked documentation, eg star chart.

Making a Professional Judgement

These guidelines cannot provide a complete checklist of what is, or is not appropriate behaviour for adults in all circumstances. There may be occasions and circumstances in which adults have to make

decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists.

Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge. Such judgements, in these circumstances, should always be recorded and shared with a senior manager. In undertaking these actions individuals will be seen to be acting reasonably.

Adults should always consider whether their actions are warranted, proportionate and safe and applied equitably.

Power and Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship can be described as one in which one party in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

A relationship between an adult and a child or young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential.

Where a person aged 18 or over is in a specified position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity. Please refer to the Sexual Offences Act 2006 and the Protection of Vulnerable Adults (POVA).

Whistle Blowing

Whistle blowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Each employer should have a clear and accessible whistle blowing policy that meets the terms of the Public Interest Disclosure Act 1998. Adults who use whistle blowing procedures should be made aware that their employment rights are protected.

Adults should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.

Developing an Intimate Care Plan (See Appendix 1)

Where a routine procedure is required, an intimate care plan should be agreed in discussion with the child/young person, setting staff, parents/carers and relevant health personnel. The plan should be signed by all who contribute and reviewed on an agreed basis. A six monthly review would be recommended but this would need to be more frequent if the circumstances are changing.

In developing the plan the following should be considered:

Implications for settings:

- The importance of working towards independence
- Arrangements for transport etc
- Who will substitute in the absence of the appointed person/s
- Strategies for dealing with pressure from peers, eg teasing/bullying particularly if the child/young person has an odour
- Management of the plan: writing it, managing it, handling confidentiality, reviewing it etc
- Management of the environment. Appropriate area for changing ensuring privacy and dignity for the child or young person
- Intimate care plans will be available to the member of staff giving the care and not displayed for all to view, thus helping to support the child/young person's dignity.

All plans must be clearly recorded to ensure clarity of expectation, roles and responsibilities. A procedure should also be included to explain how concerns arising from the intimate care process will be dealt with.

Environmental Considerations

Consideration needs to be given as to the most appropriate space and facilities for the intimate care to take place. Under the Disability Discrimination Act 1995, all public buildings must have an accessible toilet, but in many instances these are not adequate for children and young people who need additional equipment such as changing benches or hoists.

Advice can be sought on providing a suitable environment which takes into account the needs and choices of the child/young person and of other users of the building. It is necessary to look at issues such as proximity to the play room, how to ensure privacy and dignity, the types of equipment needed, how to alert for assistance if required etc. Environmental advice pertinent to a child/young person can be gained by contacting the Occupational Therapist who supports the child/young person in the setting.

Moving and Handling

Assisting with personal care tasks may present challenges for moving and handling. At all times the child/young person's wishes and choices must be considered, but procedures must also take in to account the safety of the people who are assisting.

Manual handling risks need to be assessed and identified and measures put in place to reduce the risk as required. This may involve small items of equipment, such as grab rails or steps, or may be more complex equipment such as mobile or ceiling track hoists and electric height adjustable changing benches.

Advice as to the best moving and handling procedures can be requested via the Occupational Therapy (OT) and Physiotherapy (PT) service supporting the setting. This service can be found via South Gloucestershire's Children's Information Service (01454) 868008.

For children in mainstream it is possible to request formal moving and handling training for staff involved with an individual child/young person via the Special Needs Officer within Student Assessment Service. Special Schools are responsible for providing their own training package. The Manager will liaise closely with the health OT/PT to ensure that advice is consistent and in keeping with the therapeutic aims.

In the same way as an intimate care plan is required, there also needs to be a clear protocol for the moving and handling procedures identified for the task. This should clarify who and how these

procedures are to be undertaken. This also needs regular review due to changing circumstances. At minimum, annual training is needed and more frequently in the event of changing staff or circumstances.

The Intimate Care Plan

Having identified, as far as possible, with the child/young person the most appropriate procedures and methods to ensure the personal care is met, it is advised to produce an 'Intimate Care Plan'. This is a signed record of agreed procedures and persons who are engaged in the task. It states the aims and purpose of the activity and how this is to be met. As situations are subject to change, this needs to be reviewed on a six monthly basis. In some instances, review will need to be made on a more frequent basis.

See Appendix for Model Intimate Care Plan and Guidance.

Links with Other Agencies

Positive links with other agencies will enable setting based plans to take account of the knowledge, skills and expertise of other professionals and will ensure the child's well being and development remains paramount.

It is recommended good practice for settings to know which agencies and involved with the child/young person, to seek advice, involve parents or the person who knows the child/young person best and also to consult a relevant health professional such as the school nurse, OT or physiotherapist.

Staff Development

- All staff should receive training in good practices, which comply with best practice. Every member of staff must receive Child Protection training every year; this will include the Manager, Play Leaders, Play Assistants, the school collectors/Walkers and Volunteers.
- Individual staff must be supported in the specific types of intimate care that they carry out and fully understand the intimate care policy and guidelines
- Where appropriate staff must receive Moving and Handling training at least every year
- Newly appointed staff should be closely supervised until completion of a successful 'probationary' period
- Whole Club staff training should foster a culture of good practice and a whole school approach to intimate care
- Individual staff must keep a dated record of all training undertaken.

The following guidelines should be used in training staff identified to support intimate care.
The Club Manager should be able to:

- Ensure staff have had appropriate external checks (eg DBS) and that the setting has a protective ethos and all staff are aware of the whistle blowing policy
- Ensure staff know of the whole setting approach to intimate care
- Ensure staff know who to ask for advice if they are unsure or uncomfortable about a particular situation
- Ensure that sensitive information about a child/young person is only shared with those who need to know, such as parents, members of staff specifically involved with the child. Other staff should only be given information that keeps the child safe
- Consult with parents/child/young person about arrangements for intimate care
- Ensure that appropriate personal safety skills are taught to all children/young people so that they understand good/bad touches, good/bad secrets, telling etc
- Ensure staff are aware of set procedures, the Child Protection Policy and Health and Safety Policy etc

- Ensure staff understand the needs of refugee children, asylum seekers and children from different racial and cultural backgrounds and specialist advice is sought where necessary
- Ensure staff are aware of and have training in the communication system/s that the child they are working with uses

In addition staff members should be able to:

- Access other procedures and policies regarding the welfare of the child/young person, eg Safeguarding and Child Protection, Behaviour, Anti-Bullying, Positive Handling etc
- Understand their duty of care, know how to log and pass on concerns to the designated person in the setting
- Identify and use a communication system with which the child/young person is most comfortable with
- 'Read' messages a child/young person is trying to convey
- Communicate with and respectfully involve the child/young person in the intimate care process
- Offer choices, wherever possible
- Ensure greater independence with the procedure of intimate care
- Maintain confidentiality with the child/young person when discussing elements of their intimate care unless it is a child protection issue when Child Protection Procedures must be followed.

Sharing Concerns and Recording Incidents

All staff members should be made aware that the Club Manager is the designated person for child protection is, where the Safeguarding and Child Protection policy and procedures are kept, including procedures for dealing with allegations against adults. There is a named Deputy who shall deal with any allegations against the Manager. All allegations must be taken seriously and properly investigated in accordance with local procedures and statutory guidance. Adults who are the subject of allegations are advised to contact their professional association.

In the event of any allegation being made, information should be clearly and promptly recorded and reported to the manager who should then follow the LSCB procedures.

Staff should always feel able to discuss with the Manager any difficulties or problems that may affect their relationship with children and young people so that appropriate support can be provided or action can be taken.

It is essential that accurate and comprehensive records be maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of children and young people.

Visits and 'Out of Club' Activities

A setting may have robust procedures and plans in place for the day to day intimate care needs of a child or young person, but further consideration will need to be taken in good time before a trip or for an 'out of club' activity. The same principles apply and advice can be requested from the Occupational Therapist who supports the child/young person in school.

If required, the Manager can request that the Club/setting be visited in advance and considerations as to how equipment can be accommodated. Again, specific training may be required as the environmental aspects may be different.

Appendix 1

Intimate Care Plan

Child's Name:	Date of Birth:
Male/Female:	Other settings used:
Description of Intimate Care Needs:	
Describe what the young person can do for themselves:	
Identify one part of this process, which could be developed so that greater independence/involvement can be achieved:	
Action Plan - Describe the steps needed to achieve this task: 1. 2. 3. 4. The following people will be assisting in the above activities: Named Person:	
Additional people who may be involved to cover when the named people are absent:	
I am in agreement with the above procedures being undertaken (please sign as appropriate):	
Person for whom the plan is for:	
Parent/Carer:	
SENCO/Inclusion Officer:	
Date:	
Date for Review:	

Guidelines for Use

The plan is an individualised protocol to ensure that the process of giving and receiving care is respectful, tailored to the individual needs of a child or young person and promotes safety for those receiving and administering the care.

It is recommended that where intimate care is required, an individual plan is drawn up and updated regularly. A six-monthly review is good practice. It is advisable to have a named person who takes the lead and this needs to be identified on the plan.

The child/young person's choices and preferences need to be considered and incorporated into the plan as far as possible.

1. Description of the child/young person's Intimate Care Needs

Use this space to describe the child/young person's ability and need for intimate care. (eg 'N' needs full assistance for his/her toileting needs. S/he does not indicate a need to go to the toilet or when wet or soiled. 'N' needs assistance to transfer onto a changing table using a hoist and sling from the wheelchair. 'N' can assist with cleaning his/her hands by sitting at the wash basin in

the wheelchair and placing their hands under the running water and rubbing them with soap.)

2. Task

Select a part of the whole intimate care process, which could be developed to encourage the child/young person's independence. This may be only one stage of the whole process, but more can be added. If possible, involve the child/young person in selecting which part of the task to focus on. (eg 'N' will assist in taking the wipe and assist in their own personal cleaning.)

3. Action Plan

A detailed plan of what is needed for 'N' to be able to achieve the selected task eg:

- Two staff members will assist 'N' to move from wheelchair to the changing bench using a hoist and sling as demonstrated
- When 'N' is lying on the bench give a verbal/visual cue that the pad will be removed
- Undo tapes and remove and dispose of pad
- Give a verbal/visual cue that a wipe is to be used
- Assist 'N' in taking the wipe and prompt verbally/visually for him/her to complete the cleaning as required
- If additional cleaning is required, explain this to 'N' and staff member to complete the task
- Give verbal/visual prompt to say that you are now going to put on a clean pad
- Replace clothing and transfer back to wheelchair using equipment as before

The frequency of review will depend on the complexity of the task and progress of the individual. Circumstances may change which require more frequent review. This will work best if all people involved feel that they have some influence in the progress.

Wild About Play

Early Years Foundation Stage (EYFS) Policy

Overarching principles

Four guiding principles should shape practice in early years settings. These are:

- every child is a **unique child**, who is constantly learning and can be resilient, capable, confident and self-assured;
- children learn to be strong and independent through **positive relationships**;
- children learn and develop well in **enabling environments**, in which their experiences respond to their individual needs and there is a strong partnership between practitioners and parents and/or carers; and
- **children develop and learn in different ways and at different rates**. The framework covers the education and care of all children in early years provision, including children with special educational needs and disabilities.

As a setting registered with Ofsted on the Early Years Register, we at Wild About Play are aware of our responsibility to support children from pre-school age during the Summer Holiday club to the 31st of August following the child's 5th birthday. In practice this means children who are pre-school aged or in the Reception Year at school will be supported with their learning and development in line with the Early Years Foundation Stage.

In order to support children in the EYFS, Wild About Play will have regard for the EYFS themes:

A Unique Child

- EYFS children will be identified at the point of membership via the membership form
- Individual planning, that takes into account the individual interests and development of each EYFS child, will be completed for sessions that the individual EYFS child attends
- Sensitive observations will be completed regularly and logged
- Next Steps gained and shared with parents, carers and teachers will be supported through play

Positive Relationships

- Consent to share information with the main EYFS provider will be sought from parents
- The child's EYFS record will be freely available to both parent/carer and child to view at any time and parents/carers are encouraged to contribute to this record if they wish
- Each EYFS child will be allocated a named keyperson before they start at the Club, and children and parents will be made aware of whom this person is. The key working arrangement will be reviewed after the child has attended for a few weeks to ensure that best member of staff supports each child

Enabling Environments

- Each EYFS child's main EYFS provider will be identified at the point of membership via the membership form
- As a play setting, the Club will ensure that it provides a good range of freely accessible resources (both inside and out) so that children's self-directed play covers all of the seven areas of learning and development
- The Club will remain true to the principles of play being child directed by providing opportunities that the child can choose to engage with but will never insist that a child takes part in any planned activity
- The Club will have an awareness of main topics being covered by the main provider so they are in a position to support and extend children's interests

Learning and Development

- The setting has a named EYFS Co-ordinator whose role is to ensure that the EYFS is effectively implemented within the setting
- We will ensure that all staff are familiar with the EYFS
- Staff shall be trained on Club procedures for EYFS which involve gathering information and settling the child in, establishing relationships with children, parents/carers and providers, observing, assessing and planning
- Group play linked to the seven areas of learning and development will be encouraged and take on board the ideas and interests of all children
- The Club will make every effort to link with the main EYFS provider. We shall support, where appropriate, areas that the main provider has identified
- Observations will be reviewed regularly to ensure the child's progress and areas to focus on for the next period will be identified. These will be shared with the main provider where appropriate.

Safeguarding Children

All children/young people will be taught personal safety skills relative to their age, ability and understanding. These skills will be shared with parents/carers to enable them to be consolidated within the home/community.

If a member of staff has any concerns about physical or behavioural changes in a child/young person's presentation, eg marks, bruises, soreness or reluctance to go to certain places/people etc s/he will immediately pass their concerns to the Play Leader leading that particular session who shall then in turn inform the Manager.

If a child/young person is displaying inappropriate sexual behaviour, advice should be sought from the local Social Services Department.

If a child becomes distressed or unhappy about being cared for by a particular member of staff, the matter will be looked into and outcomes recorded. Parents/carers will be contacted at the earliest opportunity as part of this process in order to reach a resolution. Staffing schedules will be altered until the issue/s are resolved so that the child/young person's needs remain paramount. Further advice, following the Interagency Procedures will be taken from outside agencies as necessary.

If a child makes an allegation against a member of staff the procedures for Allegations Against Staff, in the Safeguarding Procedures will be followed. All staff will be required to take part in the appropriate training of the Club's procedures for logging and reporting Safeguarding concerns.

Fire Safety and Fire Risk Assessment

The designated Fire Safety Officer has the responsibility to ensure that all staff and volunteers are made aware of the following procedures at the start of their induction period.

The Manager of the Club will appoint a designated Fire Safety Officer.

The Club complies with the Regulatory Reform (Fire Safety) Order 2005, which came into force in October 2006. It demands that a specific fire safety risk assessment is undertaken for every workplace, bringing fire safety into line with other health and safety legislation.

Designated Fire Safety Officers are responsible for:

Producing a fire risk assessment with the support of the Manager;

1. identifying potential fire hazards
2. deciding who, in the event of a fire, might be in danger in the workplace or while trying to escape from it, and note their location
3. evaluating the risks arising from the hazards and decide whether existing fire precautions are adequate or whether more should be done to get rid of the hazard or to control the risks, eg by improving the fire precautions
4. recording the findings and details of the action taken as a result and tell employees about the findings
5. keeping the assessment under review and revise it when necessary (at least once a year)
6. Recording and sharing with colleagues/Managers: fire risk assessments, fire drills, incidents and any findings and actions identified
7. Instruction and training relevant people/colleagues on fire procedures and the use of fire fighting equipment
8. Carrying out regular (at least once per half term) fire drills to allow all children and adults to experience the evacuation process. All fire drills will be recorded and evaluated

General Fire Prevention Precautions

- Ensuring that power points are not overloaded with adaptors
- Equipment will be properly maintained and inspected in accordance with the manufacturer's instructions. All electrical toys and equipment are subject to PAT (Portable Appliance Testing) regularly
- Ensuring that the Club 'No Smoking' policy is always observed
- Checking for frayed or trailing wires
- Checking that fuses are replaced safely
- Switching off all electrical equipment before leaving the premises
- Storing any potentially flammable materials safely

All staff are aware of the location of all fire exits, the fire assembly point and where fire safety equipment is stored. Where possible, staff will be trained to use basic fire fighting equipment such as extinguishers and fire blankets. In the event of a small fire, staff will only attempt to put out if they feel confident to do so and they or others are in no imminent danger.

Children will be made aware of the fire safety procedures during their settling in period and on regular occasions from then on. All children will be made aware of the location of fire exits and the fire assembly point.

Fire doors and fire exits are clearly marked and never locked, are not obstructed at any times, and are easily opened from the inside.

Fire extinguishers and fire alarm systems are regularly tested in accordance with manufacturer's guidance.

The assembly point will be risk assessed and moved when appropriate.

In the Event of a Fire

A member of staff will raise the alarm immediately and the emergency services will be called at the earliest opportunity.

The children will immediately be escorted out of the building by assistants and to the assembly point using the nearest safe fire exit. No attempt will be made to collect personal belongings, or to re-enter the building after evacuation.

The Designated Fire Safety Officer will check the entire premises and the register and registration forms (in order to contact parents to collect their children if necessary) will be collected, providing that this does not put anyone at risk. On exiting the building, the Fire Safety Officer will close all accessible doors and windows to prevent the spread of fire.

The register will be taken and all children and staff accounted for. If any person is missing from the register, the emergency services will be informed immediately. If for any reason the register is not to hand, the Manager should access the emergency contacts list that is kept off the premises (for further details see the Documentation and Information policy).

If for any reason the designated fire safety officer is absent at the time of an incident, the Play Leader will assume responsibility.

Healthy Eating

3.47

The Club is committed to providing healthy, balanced and nutritious food and drinks for children during our sessions. The Manager and staff will make every effort to ensure that food and drink is safely prepared and sensitive to the dietary, religious and cultural requirements of all the children.

When preparing food and drink, staff will be mindful of the provisions Health and Safety policy.

At least one member of staff are to hold a level 2 Food Handling training certificate and are fully trained in food storage, preparation, cooking and food safety.

3.48

All other staff preparing foods shall be given food handling training along with the Club's Kitchen Code guidance and will prepare snacks in suitable areas such as the kitchen or snack areas.

Parents and carers are required to complete the Membership form, including information about any special dietary requirements or allergies the child suffers from, along with their food and drink preferences.

3.47

Any information relating to food allergies, special dietary requirements will be shared with the staff team and where appropriate displayed in the kitchen for food handlers to observe.

No child will ever be forced to eat or drink something against their will and the withholding or granting of food or drink will never be used as either a punishment or reward.

Healthy Eating

3.47 Food and Drink

The staff at the Club will make every effort to promote healthy eating and will lead by example.

- Staff will discuss with children the importance of a balanced diet where appropriate
- Children will be involved in the planning of snack foods
- The Club will ensure that snack time incorporates plenty of fresh fruit and vegetables followed by some energy foods
- During specific food activities/party days meat, vegetarian and vegan options will be available
- Good quality brown and white bread will be offered
- Healthy packed lunches with an icepack are encouraged for Holiday Club
- The Club will not regularly provide sweets for children
- Excessive amounts of fatty or sugary foods will be avoided
- The Greenfield Club will provide a choice of healthy drinks
- Fresh drinking water will be available at all times
- Particular dietary requirements will be met by embracing medical, cultural and religious needs
- Children will be introduced to different religious and cultural festivals and events through different types of food and drink
- Children will eat food in a hygienic and smoke free environment, on the Club snack/dinner time areas

3.49

In the event of an outbreak of food poisoning affecting two or more children Ofsted will be notified within 14 days of the incident.

Health and Safety

The Clubs takes the maintenance of health and safety extremely seriously as a matter of both legal and moral importance. The Manager and staff will always strive to go beyond the minimum statutory standards to ensure that health and safety remains the first priority.

The Club aims to ensure the health, safety and welfare of all staff, children, visitors and other individuals. The Health and Safety at Work Act 1974 and the Workplace (Health, Safety and Welfare) Regulations 1992 and their associated Approved Code of Practice (ACoP) and guidance will be complied with at all times.

It is vital to ensure that all members of staff and other persons who are affected by the Club's activities take health and safety matters seriously. Staff who have been found to have blatantly disregarded safety instructions or recognised safe practices will be subject to the procedures laid out in the Staff Disciplinary Procedures policy.

Staff are responsible for ensuring that the provisions of Health and Safety policy are adhered to at all times. As such, they are required to:

- Take reasonable care for their own health and safety as well as of other persons who may be affected by their acts or omissions at work
- Report any accidents, incidents or dangerous occurrences that have led to, or may in the future be likely to lead to, injury or damage, and assist in the investigation of any such events
- Undergo relevant health and safety training when instructed to do so by the Manager
- Maintain an environment that is safe and without risk to health.

The Registered Body holds ultimate responsibility and liability for ensuring that the Club operates in a safe and hazard free manner. The Registered Person will ensure that adequate arrangements exist for the following:

- The Club will identify a designated trained health and safety officer
- Ensuring that staff both understand and accept their responsibilities in relation to health and safety procedures
- Providing adequate health and safety training for all staff
- Monitoring the effectiveness of the Health and Safety policy and authorising any necessary revisions to its provisions
- Providing adequate resources, including financial, as is necessary to meet the Club's health and safety responsibilities
- Ensuring that all accidents, incidents and dangerous occurrences are adequately reported and recorded (including informing the Health and Safety Executive - The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (refer to RIDDOR FORM), AND Ofsted, where appropriate)
- Reviewing all reported accidents, incidents and dangerous occurrences, and the Club's response, to enable corrective measures to be implemented
- Information received on health and safety matters is distributed to all the members of staff

- Death of a member of staff or child
- Serious assault on a staff member or child by a member of the public
- Serious accident or illness
- Chemical contamination

In such circumstances, the Manager and staff will ensure that all steps are taken to keep both the children and themselves safe. All staff and children will assemble at the pre-arranged venue, where a register will be taken.

Steps will then be taken to inform parents/carers and the Manager and to take the necessary actions in relation to the cause of the closure. All children will be supervised until they are safely collected.

If after every attempt, parents/carers cannot be contacted, the Club will follow it's Uncollected Child procedure.

A child will never be left alone on the Club premises.

If the premises are unsuitable and the registration is therefore affected it is necessary to inform Ofsted of a closure.

If the Club is closed due to bad weather then our Club website and social media site will give updates where needed about the closure of the Club.

Health

3.47

Staff will make sure there is a regular supply of drinking water available to children at all times, especially in hot conditions. In such circumstances, staff will also ensure that children are adequately protected from the sun.

Sun Protection

The Manager and staff understand the dangers posed to children and themselves by over exposure to the sun. In hot weather, parents/carers are encouraged to provide sun cream for their children.

Parents should give permission for sun cream to be applied in the Membership Form.

Children will also be encouraged to wear a hat when playing outside in the sun.

When deemed necessary, staff may apply sunscreen to children who cannot do so for themselves, where prior permission has been given by the parent/carer on the Membership Form.

In hot weather, staff will encourage children to drink water frequently. Staff should also ensure that shady areas out of the sun are always available to children when playing outside.

Hygiene

The Manager and all staff will be vigilant to any potential threats to good hygiene at the Club. To this end, a generally clean environment will be maintained at all times.

Toilets are cleaned daily and that there is always an adequate supply of soap and hand drying towels for both staff and children. This is also monitored throughout the session.

The Paediatric First Aider will be mindful of the need to observe the highest standards of personal hygiene when administering any treatment to children.

As such, they will wash their hands thoroughly both before and after giving first aid, and ensure that plasters or disposable gloves cover any cuts, wounds or skin damage.

Site Security

Parents/carers are encouraged to talk to their children about the importance of remaining safe and not leaving the Club premises during the session. The Club staff will reinforce this.

The main entrance to the Club will be kept locked using two separate locks to prevent any strangers accessing the premises.

All staff will observe and supervise the entrance and exit points when the Club is in operation.

Visitors will be greeted on arrival and will be asked to sign the visitor's book and state the purpose of their visit. Visitor I.D shall be checked as necessary.

Visitors to the Club will not be left unsupervised with children at any time.

If an unexpected visitor has no suitable reason to be on the Club premises, then they will be asked to leave immediately and escorted from the premises. If the visitor repeatedly refuses to leave, the police will then be telephoned immediately.

A record will be made of any such incidents in the Incident Record Book, and the Manager will be immediately notified.

The Manager (in consultation with staff and parents/carers) will regularly review security procedures.

Equipment

All furniture, toys and equipment are kept clean, well maintained and in good repair and in accordance with BS EN safety standards of the Toys (Safety) Regulations (1995) where applicable.

Equipment will be properly maintained and inspected in accordance with the manufacturer's instructions. All electrical toys and equipment are subject to PAT (Portable Appliance Testing), and that relevant staff are trained on the correct use of computers and other IT equipment.

All equipment and resources will be selected with care, and risk assessments carried out before new toys and equipment are purchased, according to the principles of the Risk Assessment policy.

Defective or broken equipment will be taken out of use and stored in a safe place before being disposed of. Flammable equipment will be stored in a safe location away from sources of heat and/or naked flames.

Animals

No animal will be allowed on the premises without prior knowledge (with the exception of disability assistance dogs) and permission of the Manager.

Closing the Club at Short Notice/in an Emergency

In very exceptional circumstances, the Club may need to be closed at very short notice due to an unexpected event. Such incidents could be:

- Serious weather conditions (combined with heating system failure)
- Burst water pipes
- Threat of an attack/Terrorist attack
- Discovery of dangerous structural damage
- Fire or bomb scare/explosion

Health and Safety Inspections and Risk Assessment

The identification, assessment and control of hazards within the Club are vital in reducing accidents and incidents. For further information refer to the risk assessment policy.

Daily safety checks are carried out, to ensure that the facilities are maintained in a suitable state of repair and decoration.

Any action required as a result of health and safety inspection is taken as rapidly as possible. An investigation is carried out on all accidents, incidents and dangerous occurrences.

3.54

Safety Policy

The Club premises are fit for purpose- safe, secure and adequately spacious for play and for children to interact freely (a minimum of 2.3 square metres' space per Early Years child).

Staff and any other authorised persons who are regular visitors to the Club will be issued with either an identity badge or clearly identifiable clothing, which they are expected to wear at all times while on the Club premises (lanyard/polo-shirt).

The Manager is responsible for, in partnership with the premises owners, ensuring that the Club's premises are clean, well lit, adequately ventilated and maintained at an appropriate temperature. Under our Fire Safety obligations adequate fire and smoke detecting equipment as well as fire control equipment is in working order.

The Club premises, where reasonable, comply with all the requirements of the Disability Discrimination Act 1995 and all other relevant regulations and guidance.

During the Holiday Club opening hours, the premises are used by the Club, its staff and the children only. Any visitors are recorded in the Visitor Book.

There is adequate space for storing all equipment safely and securely so that staff and children are protected when accessing toys and equipment.

Staff will ensure that there is suitable toileting and hand washing facilities with warm water, anti-bacterial soap and paper towels readily available.

No child will be left unsupervised in the kitchen area.

Members of staff will have access to a telephone at all times whilst on the Club premises.

In the event of snow or ice on external pathways, the premises owners and staff will ensure that this is regularly cleared and kept safe.

All chemicals will be stored in an appropriate way that is inaccessible to children. COSHH regulations must also be observed.

Supervision

Children are supervised appropriately according to the level of risk involved during play and activities along with the ages and number of children involved in a given activity. Staff are deployed adequately to ensure general supervision at all times.

Kitchen Hygiene

All areas where food and drink are stored, prepared and eaten are prone to the spread of infections. Therefore, staff must be particularly careful to observe high standards of hygiene in such instances. To this end the following steps will be taken:

- At least one member of staff will be trained in level 2 food hygiene
- All food handlers will be trained in food handling and storage
- Waste will be disposed of safely and all bins will be kept covered
- Food storage facilities will be regularly and thoroughly cleaned
- Kitchen equipment will be thoroughly cleaned after every use
- If cooking is done as an activity, all surfaces and equipment involved will be thoroughly cleaned before and after the session.
- Additionally, staff will be aware of the provisions set out in the Food and Drink policy when handling, cooking and serving food or drink at the Club. They shall be requested to follow the Club's Kitchen Code at all times.

Personal Hygiene

In all circumstances, staff will adhere to and ensure that children carry out the same routines.

- Washing hands before and after handling food or drink
- Washing hands after using the toilet
- Washing hands before, if needed, and always after handling creatures/animals
- Covering cuts and abrasions while at the premises
- Using blue plasters for food handlers with a skin break
- Taking any other steps that are likely to minimise the spread of infections
- Washing of hands prior to and following first aid

Dealing with Spillage

Spillages of substances likely to result in the spread of infections will be dealt with rapidly and carefully. Blood, vomit, urine and faeces will be cleaned up immediately and disposed of safely and hygienically by double bagging and taken out of the setting. Staff will wear disposable plastic gloves and an apron while using bleach or disinfectant solution, and wash themselves thoroughly afterwards. Children will be kept well clear while such substances are being dealt with.

The Manager and staff are committed to taking all practicable steps to prevent and control the spread of infectious germs, and to uphold high standards of personal hygiene in order to minimise the risk of catching or spreading infections.

Insurance

The Children Act 1989 and the Health and Safety at Work Act 1974, place a number of legal responsibilities on the Club. Therefore, the Club has Public Liability Insurance cover appropriate to its duties under this legislation, including Employer's Liability Insurance.

Responsibility will, in most cases, rest with the Club, but staff will take reasonable care, both for themselves and other people who may be affected by their acts or omissions at work. If the Club is held responsible for any incident that may occur, public liability insurance should cover compensation.

Lockdown

The Club takes health and safety very seriously. There may be an occasion where the building, Club or local area is under threat. In these circumstances, the Club will have a well-prepared response proportionate to the potential threat or risk.

Any incident likely to invoke fear or terror and have a potential affect to our safety may trigger a lockdown response.

Some possible scenarios of our lockdown procedures being carried out are:

- Air Pollution from smoke or chemicals
- Civil disturbance within the local community
- A report or sighting of an unsuitable person in or around the premises
- Terror threats or attacks/risk of injury or death

Procedures:

- In the event of these circumstances the Leader in charge will contact the emergency services (a phone is always accessible at Club) and take the registers with them
- The Centre Manager, who has ultimate responsibility for the premises, will contact the Club to inform staff of a potential risk or vice versa so that other building users are alerted to any dangers
- The Leader will need to make a decision, depending on location and the location of the risk, whether to vacate the area or to lockdown

If the Leader makes the decision to implement full lockdown then the following procedures will take place:

- All children will be accounted for and every safe attempt made to locate them quickly and safely
- Play Assistants will ensure that the children are directed towards the safest area under the circumstances
- The children will be kept safe and calm whilst decisions on maintaining secure windows/fire exits and doors etc are made
- Appropriate and immediate action will be taken in response to the type and level of risk: reducing or removing any risks such as shutting doors and windows to prevent air pollution, hiding the children away from possible terrorists or barricading entrance points

In the case of many play areas or outside areas being in use the following procedures will apply (this will also apply to the staff collecting children from school on foot or by bus):

- Notify the staff team (and emergency services if needed) immediately
- If already outside of the premises, or in a situation where staff are needing to vacate the premises quickly, a safehouse must be sought. Some suggested buildings are as follows - Schools, Churches, shops and other buildings that may already have lockdown procedures in place.
- Staff are to contact the person holding the whole Club registers so that everyone can be accounted for as soon as possible

When the emergency services or staff member in charge gives the all clear staff members will evacuate the area with their children safely and the following will take place:

- Parents/carers will be informed as soon as possible of the situation and whether it is safe or possible yet to collect their children

In order to be as prepared as possible, staff will undergo evacuation training scenarios including terror attacks and fire. The aim of this training is for staff to be clear in dealing with any high-risk scenarios..

✓ Inductions

→ Staff Training

→ Evacuation Scenarios

Involving and Consulting Children

The Club and all its members of staff, are committed to the principle of involving and consulting children whenever decisions that affect them are made within the Club. This is part of our British Values policy and procedure where we respect the opinions and decisions of others.

The Club's commitment to involving and consulting children stems from the 'listening to children' provisions set out in Articles 12 and 13 of the United Nations Convention on the Rights of the Child. These state that:

'a child's opinion should be taken into account in anything that affects them. Children should have information disseminated in a way that enables them to make choices and decisions.'

And with the development of a Participation Charter which states:

Participation is a right

The United Nations Convention on the Rights of the Child states that any child or young person has a right to express their views and have them given due weight in decisions affecting them. In accordance with their age and maturity. Participation is not a privilege and it does not have to be earned; rather, it values children and young people as citizens in their own right. The UK has ratified the convention, and public services are increasingly required by law to take seriously the wishes and feelings of children.

For children, involvement and consultation helps them to develop new skills such as negotiating, sharing and understanding the perspectives of others. It helps them to understand how decisions are made, and recognises that their opinions are important.

There are multiple benefits of such an approach such as relationships with children based on partnerships, a more cohesive environment and activities and decisions that children feel a sense of ownership over, that leads to an improved overall higher standard of behaviour.

All children that attend the Club will be listened to and consulted actively. This will take a number of forms, including:

- Listening to what they say in speech and other forms of communication
- Observing body language and behaviour
- Drama and role-play
- Through play and creative expression and the use of visual aids
- Via regular group based discussions and Q & A sessions
- Questionnaires, dot voting and other regular feedback on activities
- Notice boards that display important information about activities at the Club
- Regular children's meetings, between children and staff, discussing the Club's activities and any other relevant topics.

Age, maturity and the type of decision being made will determine the extent and nature of children's involvement. However, the emphasis should always be strongly in favour of involving children.

We undertake to ensure that children have the opportunity to make decisions and/or participate in, as a minimum, the following:

- Choosing the type of snacks available
- Choosing how, when and where they have their snack
- Being involved with preparation of snack
- Involved with choosing new toys/equipment/resources
- Involved with the actual purchase of toys/equipment/resources

- Choosing to play inside/outside when they want to
- Choosing the venue on excursions
- Involved with developing club rules
- Contribute to new children's induction/welcome packs
- Contribution to the Club newsletters
- Creating and implementing fundraising activities
- Assisting with designing publicity posters
- Assisting with the evaluation of fire drills
- Involved with the recruitment of new staff

Consultation and involvement will be regularly monitored and acted upon so that children are able to see that their input has led to visible outcomes. The Club and its staff will also be clear about what decisions children will be involved in and attempt to offer clear explanations if and when consultation and involvement is deemed inappropriate.

The Club and its staff are committed to working towards achieving level 10 on Harts Ladder.

What's it all about – Harts Ladder

10. Children and young people in charge!
9. Young people lead with help from others
8. Joint decision making
7. Consultation
6. Invitation
5. Tokenism
4. Decoration
3. Manipulation
2. Adults rule kindly
1. Adults rule!

Hart's Ladder is a standard framework for understanding children and young people's participation. It's progressive, encouraging practitioners to build on their experience, but its distinctions are sharp, supporting us to separate our aspirations from our actual achievements. By way of example, much of what gets called consultation is more properly described as invitation, where children and young people are invited to contribute their opinions, but the opinions themselves aren't really used or reflected on.

This kind of distinction stands even in situations where what the young people say is written up and published in glossy formats – recording something doesn't always equate to considering it.

Mission Statement

This statement outlines the services that children, parents/ carers and the community can expect from the Club, and the values that inform our work:

The Club aims to:

- Provide a happy, safe, warm and stimulating environment for all children to play, learn and develop freely
- Help children to develop responsibility for themselves and their actions and to become competent, confident, independent and cooperative individuals
- Encourage children to have a positive attitude and respect for both themselves and other people
- Promote a positive relationship with parents/ carers and work in partnership with them to provide high quality play and care for their children
- Offer inclusive services that are accessible to all children in the community
- Undergo regular monitoring and evaluation of our services to ensure that the Club continues to meet the needs of children and parents/ carers
- Work in partnership with the local schools

The Club is committed to meeting the needs of children, parents and carers by:

- Listening and responding to their views and concerns
- Keeping them informed of our policies and procedures, including opening times, fees and charges, and programmes of activity
- Sharing and discussing their child's achievements, experiences, progress and friendships, along with any difficulties that may arise

The Club is committed to:

- Offering a wide range of play and activities that respond to children's needs
- Providing access to a variety of facilities and equipment under safe and supervised conditions
- Ensuring the staff and team is experienced, well trained and properly supported
- Offering a service that meets the conditions of the Children Act 1989 and all other relevant childcare legislation, wherever they apply
- Providing an environment where no child is bullied or suffers discrimination of any form

Missing Child

- The main aim of this policy and its procedures is to ensure our children's safety at all times
- Staff shall take actions to minimise the potential for children to go missing
- Staff shall act promptly by following clear procedures if a child is discovered to have gone missing

Child Missing from the Club

The Club has the highest regard for the safety of the children in our care. Staff will always be extremely aware of the potential for children to go missing during sessions.

Even when all precautions are properly observed, emergencies can still arise. Therefore members of staff will undertake periodic head counts, especially at the transition points between sessions, promote children's play within boundaries and be aware of area risk assessments.

Staff shall request updated Membership form details if they have changed on an annual basis and give regular reminders for parents/carers to update their contact details.

If for any reason a member of staff cannot account for a child's whereabouts during a session at the Club, the following procedure will be followed:

- The Manager/Play Leader and the rest of the staff team must be informed that the child is missing.
- A thorough search of the entire premises will commence and time noted.
- The staff team will be careful not to create an atmosphere of panic and to ensure that the other children remain safe and adequately supervised.
- The Manager/Play Leader will nominate as many members of staff as possible to search the area surrounding the premises.
- All staff will be extra vigilant to any potentially suspicious behaviour or persons in and around the Club.
- If after 10 minutes of thorough searching the child is still missing, the Manager/Play Leader will inform the Police immediately and then the child's parent/carer.
- The Child's emergency contacts should be phoned straight away if there is any difficulty in contacting the parent/carer. If no one from the child's contacts list can be spoken to then staff must not hesitate in telephoning the child's school to check if any new numbers have been given.
- While waiting for the Police and the parent/carer to arrive, searches for the child will continue.
- During this period, other members of staff will maintain as normal a routine as is possible for the rest of the children at the Club.
- The Manager/Play Leader will be responsible for meeting the Police and the missing child's parent/carer.
- The Manager/Play Leader will coordinate any actions instructed by the Police, and do all they can to comfort and reassure the parents/carers.
- Once the incident is resolved, the Manager and the staff team will review relevant policies and procedures and implement any necessary changes.

All incidents of children going missing from the Club will be recorded on an Incident Record Sheet, and in cases where either the Police or Social Services have been informed, Ofsted will also be informed, as soon as possible.

Child Missing from School

If for any reason a member of staff cannot account for a child's whereabouts whilst collecting the children from the school's designated area, the following procedure shall be followed:

(At School end time)

- The Manager/Play Leader and the rest of the staff team must be informed that the child is missing.
- A member of staff must be delegated the task of checking with the School office with regards to a child's whereabouts. School offices shall use their knowledge of the child's attendance, extra-curricular activities and messages from parents to establish where the child is.
- The School or Play Leader in charge shall contact the child's emergency contacts to establish whether they have been collected by their parent/carer as well as any other parent/carers if needed.
- The child's classroom should be searched during this time.
- If the child can no longer be found then a thorough search of the entire school premises will commence and time noted.
- The staff team collecting the children from school shall be careful not to create an atmosphere of panic and to ensure that the other children remain safe and adequately supervised. They shall be updated on any progress by the staff member dealing with the missing child situation.
- All staff will be extra vigilant to any potentially suspicious behaviour or persons in and around the School.
- If after 10 minutes of thorough searching the child is still missing, if staff have confirmation that the child has not been collected by a designated adult or if there has been no response from the child's emergency contacts, the Manager/Play Leader or School Office shall inform the Police immediately followed by the child's parent/carer.
- While waiting for the Police and the parent/carer to arrive, searches for the child shall continue.
- During this period, other members of staff will maintain as normal a routine as is possible for the rest of the children at the Club. The children may be walked back to the Club for snack time after an update from the designated 'searcher'.
- The Manager/Play Leader and School staff shall be responsible for meeting the Police and the missing child's parent/carer.
- The Manager/Play Leader will coordinate any actions instructed by the Police, and do all they can to comfort and reassure the parents/carers.
- Once the incident is resolved, the Manager and the staff team will review relevant policies and procedures and implement any necessary changes.

All incidents of children missing from their school when they are due to be collected by the Club staff, will be recorded on an Incident Record Sheet.

Partnership with Parents and Carers

The staff team is committed to working in partnership with parents/carers at Wild About Play.

This is to help provide a high quality of care and safe and stimulating play opportunities for children.

The Club will aim to achieve this by:

- Ensuring that all parents/carers are made to feel welcome and valued in all dealings with the Club.
- The Club staff will allow for parent and carers to be involved in settling their child in to the Club.
- Ensuring that the Club always listens to parents/carers concerns whenever they are raised.
- The Manager will ensure that parents/carers receive a prompt response from the Club.
- Making every effort to print information about the Club in different languages and brail where necessary. Sign language and interpreters will be used where required.
- Developing a Mission Statement for parents/carers, which outlines what they can expect from the Club. The Mission Statement will be given to every parent/carer when their child starts at the Club. A copy will also be posted up in the Club premises.
- Developing a regular newsletter that highlights special events and shares information that may impact on the Club, such as change of staff, staff training, new legislation.
- Making records and information available to parents on written request, unless subject to an exemption eg if an investigation is in process by the police or other statutory agencies.
- Ensuring that the Club's policies and procedures are made available to parents/carers on Request.
- Encouraging parents/carers to comment on the Club policies and procedures and consulting them on a regular basis about the play and activities that are provided for their children.
- Ensuring that there are regular opportunities for parents/carers to meet with staff and discuss their child's progress and any problems that they might be encountering. Meetings will be arranged to enable all parents to attend, taking into consideration timing, notice, venues etc.
- Ensuring that any complaints from parents/carers are dealt with swiftly and effectively according to the Complaints Procedure policy.
- Encouraging parents/carers to undertake supportive roles at the Club, such as volunteering or participating in activities, visits or outings.
- Encouraging parents/carers to help in the decision making and possible running of the Club.
- Providing parents/carers with formal and, if necessary, confidential means to comment on the work of the Club. This will include an annual 'Your Views' satisfaction Questionnaire and Settling In Questionnaires.
- Keeping parents/carers up to date with any changes in the operation of the Club, such as fee levels.

Play Policy

Play is an essential part of a child's life. The Club takes children's play seriously. It is the role of the playworker to offer a wide range of play opportunities that enable children to play freely and be the masters of their own play.

All children and young people need to play; the impulse to play is innate. Play is a biological, a psychological and a social necessity, and is fundamental to the healthy development and well-being of individuals and communities. Play is a process that is freely chosen, personally directed and intrinsically motivated. That is, children and young people determine and control the content and intent of their play, by following their own instincts, ideas and interests, in their own way for their own reasons.

The prime focus and essence of playwork is to support and facilitate play.

To play is to allow one to freely explore and make sense of the world, experiment, and express things without fear of judgement.

To best facilitate children's play, the role of the playworker is to support all children and young people in the creation of a space in which they can play.

The environment will be set up prior to children arriving and will include a range of play opportunities. Children will be confident in making requests for other equipment. Equipment may be used in conjunction with other equipment.

Children are not required to be occupied at all times.

The playworker's response to children and young people playing is based on a sound and up to date knowledge of the play process, and reflective practice.

Playworkers recognise their own impact on the play space and also the impact of children and young people's play on the playworker.

Playworkers choose an intervention style that enables children and young people to extend their play. All playworker intervention must balance risk with the developmental benefit and well-being of children. A record of activities and play opportunities will be kept and reviewed to ensure that appropriate ranges of play types are offered.

Playworkers recognise that children need to put their own creative style and ideas into their creation such as cooking, arts, crafts, sports and gardening.

Children will be involved in planning activities so that the programme reflects their opinions. Activities will be carefully planned to allow children to build on the natural curiosity, advance their thinking and use their imagination.

Children will be given notice when their play must come to an end. If a play request is refused an explanation will be given.

Early Years Children

We will always endeavour to give some extra time to support our youngest children's play. Where possible our play activities will focus around the seven areas of learning and development.

Outdoor Play

3.58

Children will be offered access to outdoor play every day, with the exception of severe weather conditions.

Any outdoor activities will take place in safe, appropriately supervised spaces.

Before any outdoor activities commence, safety checks are carried out.

The Club equipment and resources reflect positive images with regard to culture, ethnicity, gender and disability.

Activities will be evaluated by staff and children regularly so play experiences and activities can be improved.

Risk in Play

The Club will facilitate and encourage play opportunities for children, which are deemed to be risky.

We recognise that risk is different for individuals, eg a four year old may deem it a risk to walk along a plank 50cms off the ground, whereas a seven year old may not deem that to be a risk unless the plank was considerably higher. We support the need for risky play and recognise that it is an important aspect of child development.

Children often crave risk when playing; they want challenge and excitement in their play. They need to experience challenging play opportunities in order to develop in their daily lives more effectively. However, opportunities for children to take such risks are often limited due to our risk-adverse culture and a preserved increase in health and safety constraints. Playworkers however need to reflect on whether they have a genuine reason to stop risky play, or if they are simply intervening out of habit or due to their personal limitations.

Equipment

The Club will provide a wide range of resources and equipment in order to provide a range of play opportunities and activities and enhance children's play experiences.

Resources will, whenever possible, show men and women in a variety of roles and jobs, and people with different abilities being both active and creative. Examples of every day life will portray people from a variety of family groupings and cultural backgrounds in a range of non-stereotypical roles.

The Club provides a wide selection of books that are regularly updated, as financial resources allow. The selection will always include reference books, dual language books and a range of age-appropriate formats. Staff are encouraged to select books that reflect a multicultural society and challenge stereotypes.

An Inventory record will be kept which will be used to see gaps in equipment. It will be updated whenever a new item is added or when an old item is removed from use.

Prevent Duty

At Club we are aware of our obligation to have "due regard to the need to prevent people from being drawn into terrorism.

The Club's Manager is aware of our duty to prevent. All staff are trained on recognising the possible signs of a child or family being drawn into terrorism.

Staff members are aware of the risk factors such as disengagement and also of the importance of an integrated multi-cultural society.

At Club the usual reporting of concerns will be followed if staff have a concern about a child or person who may have the intent or capability to carry out terrorist activities. All staff know how to log and report any concerns. The Manager understands the procedures to be followed with regards to reporting concerns to the counter-terrorism police.

In line with our Equal Opportunities, Bullying, Dealing With Racial Harassment and British Values policy and procedures the Club will ensure that all families are welcomed into the Club.

The Club will work with families and if needed, the relevant Government agencies to prevent radicalism.

An online general awareness training module on Channel is available – all staff will be encouraged to complete this online course as part of their training programme.

More Information:

(From The Prevent duty Departmental advice for schools and childcare providers June 2015)

The Prevent duty: what it means for schools and childcare providers In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools' and childcare providers' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools and childcare providers can also build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues.

What to do if you have a concern As explained above, if a member of staff in a school has a concern about a particular pupil they should follow the school's normal safeguarding procedures, including discussing with the school's designated safeguarding lead, and where deemed necessary, with children's social care. In Prevent priority areas, the local authority will have a Prevent lead who can also provide support.

You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

Risk Assessment

We understand the importance of ensuring that systems are in place for checking that the Club is a safe and secure place for children, staff and other visitors. Our risk assessment procedures are part of a continuous process to prevent any dangerous incidents taking place. They are the responsibility of all staff as part of their daily duties.

In accordance with our duties under the Management of Health and Safety at Work Regulations 1999, The Manager is required to undertake regular risk assessments and take any necessary action arising from these according to provisions set out in the Health and Safety policy and elsewhere. Reviews are conducted when there is any change to equipment or resources, any change to the Club premises, or when particular needs of a child or other visitor necessitates this.

The Manager is further responsible for conducting any necessary reviews of making changes to the Club policies or procedures in the light of any potential risks that they or other members of staff discover.

A visual inspection of both the equipment and the entire premises - indoor and outdoor - will be carried out daily. This will, ordinarily, be carried out by a designated member of staff on arrival at the Club and will be completed before any children arrive.

During the session, staff will be vigilant and continuously aware of any potential risks to health and safety arising from the Clubs environment, all surfaces and floors inside and out and all equipment used by children and staff.

On discovering a hazard, staff will take all steps necessary to making themselves and any other people potentially affected safe.

The Manager is then responsible for ensuring that any necessary action is taken.

Recording Accidents, Incidents and Dangerous Occurrences

All accidents, incidents and dangerous occurrences will be recorded either on the Incident Record or Accident Record Sheets on the same day as the event took place.

Records will be tracked in order to see regular occurrences.

Records must contain:

- The time, date and nature of the incident, accident or dangerous occurrence
- Details of the people involved
- The type, nature and location of any injury sustained
- The action taken and by whom
- Any actions or recommendations made by staff to parents
- The signature of the member of staff who dealt with the event, any witnesses and countersignature of the parents/carers of the children involved.

Safeguarding at Wild About Play

Introduction

The Club fully recognises the responsibility to have arrangements in place to safeguard and promote the welfare of children as they learn best in secure environments.

Through their day to day contact with children and direct work with families, staff at the Club have a crucial role to play in noticing indicators of possible abuse or neglect at the earliest opportunity and they need to respond in a timely way.

3.5

The designated Lead Practitioner/Safeguarding Officer will undergo appropriate Child Protection training and must report any concerns to the 'First Point team' at the Department of Children and Young People, South Gloucestershire Council-

Tel: (01454) 866000

Email: firstpoint@southglos.gov.uk.

(note for staff-).
Tina Wilson (L.A-D.O) also has a displayed contact tel no. at Club

For immediate concerns about the safety of children in emergencies the police should be called.

This policy sets out how the Club discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who attend the Club.

There are four main elements to our policy:

5. PREVENTION through the support offered to children and the creation and maintenance of a whole club protective ethos.
6. PROCEDURES for identifying and reporting cases, or suspected cases, of abuse.
7. SUPPORTING CHILDREN who may have been abused.
8. PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN Our policy applies to all staff, paid and unpaid, working at the including volunteers. Concerned parents may also contact the Club Manager and our Designated Committee Person for Child Protection.

6. PREVENTION

We recognise that high self-esteem, confidence, supportive friends and good lines of communication, with a trusted adult, help to protect children. Being engaged in your local community and being accepting of everyone's differing backgrounds also develops a child's social well-being.

The Club will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk, and are actively listened to.
- Ensure children know that there are adults in the setting whom they can approach if they are worried or in difficulty.

- We also recognise as part of our British Values and Prevent Duty knowledge (Prevent Duty Guidance for England and Wales 2015) that we have a duty to prevent and report incidents where vulnerable children or family members may display extremist views or belief systems causing them to be drawn into terrorism.

Dec 2017:

- Training on how to identify possible signs + symptoms of being drawn into terrorism.
- Vulnerable groups/ characteristics are considered.

3.4

The Use of Mobile Phones and Cameras

In order to minimise the potential misuse of mobile phones and cameras the Club shall follow these procedures:

- Staff members and volunteers shall keep their mobile phones/cameras locked away at the designated staff area.
- The Play Leader in charge of the session may use their mobile phone to act as our emergency landline
- Staff members must request that family /friends make emergency phone calls to the club phone only unless they experience difficulty in getting through to a member of staff.
- During trips, staff members shall be able to take their own mobile phones with them. They must however not take their phones/cameras into any private areas such as toilets but instead pass these over to another member of staff.
- During trips staff members shall always stay with at least one other staff member and their groups of children.
- Parents shall not be allowed to take their phones into private locations such as the toilets if a child other than their own is present.

Please note: These procedures not only prevent the potential misuse of mobiles, phones and cameras by parents, staff and volunteers but to prevent potential for allegations being made against an adult.

7. PROCEDURES

We will follow South Gloucestershire Local Safeguarding Children Board procedures, which can be accessed online. A copy of what to do if you're worried a child is being abused' can be found at the Club.

*LSCB's bring together representatives of each of the main agencies and professionals responsible for helping to protect children from abuse and neglect in a given area. The LSCB is a multi-agency forum set up to agree how the different services and professional groups should cooperate to safeguard children in that area, and for making sure that arrangements work effectively to bring about good outcomes for children.

All staff shall be trained to understand the Club's Safeguarding Policies and procedures and have updates to support their knowledge of safeguarding issues.

3.6

Staff shall have training from the Manager/Lead Practitioner that teaches them about the four types of possible abuse and neglect. The training should enable them to identify, understand and respond to signs of possible abuse and neglect, respond appropriately to a disclosure of abuse or neglect and log and report such incidents.

The Lead Practitioner for Safeguarding in the Club is the Manager, Mrs Sian Purnford.

March 2018: This policy now covers any device that records video, sound or photos i.e. technical watches etc.

3.5

The Club will:

- Ensure it has a designated person for Safeguarding on site at every session, who has undertaken relevant training.
- Ensure that the Lead Practitioner has undergone Child Protection training.
- Recognise the importance of the role of the designated person and ensure s/he has the time and training to undertake her/his duties
- Ensure there are contingency arrangements should the designated person not be available (another trained person will be on site)
- Ensure that the designated person will take advice from a child protection specialist when managing complex cases. (The designated person has access to Social Care for 'what if' conversations. The emergency duty team (out of hours) is also available
- Ensure that the designated person for child protection provides support, advice and guidance to any other staff on an on-going basis and on any specific safeguarding issues
- Ensure that an allegation made against a member of staff or volunteer is recorded and reported to the Manager/designated Committee member.
- Ensure that the lead practitioner (The Manager) will contact the South Gloucestershire Local Authority Designated Officer (LADO) by phoning (01454) 868924 who shall discuss the concern or allegation and coordinate what needs to happen next
- Ensure that **Ofsted** are informed any allegations of serious harm or abuse by any person working or looking after children at the setting (whether the allegations relate to harm or abuse committed on the premises or elsewhere) within **14 days of the allegation being made**.

3.5

The Role of the Club's Lead Practitioner is to ensure every member of staff knows:

- The name of the designated person and her/his role
- How to pass on and record concerns about a child
- That they have an individual responsibility for referring child protection concerns using the proper channels and within the timescales set out in LSCB procedures

3.6

FGM

The Lead Practitioner will as part of all staff training, educate and update staff on Female Genital Mutilation (FGM). This is an illegal act in the UK and is treated as child abuse which occurs outside of the setting.

Staff will report if a child is at risk of or has experienced FGM. Normal Safeguarding Procedures will commence in this situation as will continued support for the child.

3.4

The Club will provide training for all staff from the point of their induction, and ensure that it is updated annually at a minimum, so that they know:

7. Their personal responsibility
8. The local procedures including how to log a concern or incident and who to report the concern to
9. The procedures for dealing with an Allegation of Abuse Made against a Member of Staff or Manager and who to report these concerns to
10. The need to be vigilant in identifying the signs of possible abuse and neglect
11. How to support and respond to a child who tell of abuse
12. Whistleblowing procedures

The Club will ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are

addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.

Liaison with Other Agencies

The Club will work to develop effective links with relevant agencies and cooperate as required with their enquiries regarding the child protection matters including attendance and written reports at child protection conferences and core groups.

Record Keeping

The Club will keep clear detailed written records of concern about children using the Safeguarding Incident/Concern form (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately:

The Club will ensure all records are kept secure and in locked locations.

Confidentiality and Information Sharing

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager or Social Care Team as required.

The designated person will disclose any information about a child to other members of staff on a need to know basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be clear with children that they cannot promise to keep secrets.

Communication with Parents

The Club will:

- Undertake appropriate discussion with parents prior to involvement of another agency (unless the circumstances will put the child at further risk of harm)
- Ensure that parents have an understanding of the responsibility placed on the Club and staff for child protection by setting out its obligations in the Staff Induction and Training Folders.

8. SUPPORTING THE CHILD AT RISK

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth and trust those around them. They may feel unhappiness, humiliation and some sense of self-blame.

We recognise that some children actually adopt abusive behaviours and that these children must be referred on for appropriate support and intervention.

The Club will endeavour to support the child through:

- Activities to encourage self-esteem and self-motivation
- The Club's ethos that actively promotes a positive, supportive and secure environment and values people
- * The Local Safeguarding Children's Board Guidance on the Sharing of Information on Children in Need and in Need of Protection can be accessed from the LSCB website at www.sgcyp.org.
- The Club's Behaviour policy is aimed at supporting vulnerable children. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the child's sense of self-worth.
- The Club will ensure that the child knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies which support the child such as Social Care, and the Locality

Teams.

- A commitment to develop productive and supportive relationships with parents.
- Recognition that children living in a home environment where there is domestic violence, drug or alcohol abuse are vulnerable and in need to support and protection.
- Vigilantly monitoring children's welfare, keeping records and notifying Social Care as soon as there is a recurrence of a concern.

Drug Use and Child Protection

The discovery that a young person is using illegal substances or reported evidence of their drug use is not necessarily sufficient in itself to initiate child protection proceedings but the Club will consider such action in the following situations:

Where there is evidence or reasonable cause:

- To believe the young person's drug misuse may cause him or her to be vulnerable to other abuse such as sexual abuse
- To believe the young person's drug related behaviour is a result of abusing or endangering pressure or incentives from others, particularly adults
- Where the misuse is suspected of being prompted by serious parent/carer drug misuse.

Children of Drug Using Parents

Further enquiries and/or further action will be taken when the Club receives reliable information about drug and alcohol abuse by a child's parent/carers in the following circumstances:

- The parental misuse is regarded as problematic (ie multiple drug use including injection)
- A chaotic and unpredictable home environment exists which can be attributed to drug or alcohol misuse
- Children are not being provided with acceptable or consistent levels of social and health care
- Children are exposed to criminal behaviour

9. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

- The Club will operate safe recruitment practices including ensuring I.D checks, enhanced DBS checks and references are undertaken
- The Club's Lead Practitioner will immediately consult the First Point team at Department of Children and Young People, South Gloucestershire Council- (01454) 866000 in the event of an allegation being made against a member of staff or volunteer.
- The locality Social work team will advise if other external/internal agencies (eg police) should be informed and we will act upon the advice given to ensure that any investigation is not jeopardised.
- The Club will notify Ofsted of a significant incident, which includes any allegation against a staff member within 14 days of the allegation being made.
- The Club will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with children and parents.
- The staff will receive guidance as part of induction about how to communicate and create appropriate professional boundaries with disabled and vulnerable children.

10. OTHER RELATED POLICIES

Anti-Bullying

Our policy on anti-bullying is set out in the Bullying policy and is reviewed annually. We expect staff to acknowledge that to allow or condone bullying constitutes a lack of duty of care. This may be subject to investigation under child protection procedures.

Racist Incidents

Our policy on racist incidents is set out in the Racial Harassment policy and is reviewed annually. The Club records racist incidents. We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

Health and Safety

Our Health and Safety policy, set out previously in this document, is reviewed annually. It reflects the consideration we give to the protection of our children both within the Club environment and when away from the Club when undertaking trips and visits.

Children with Special Educational Needs and/or Additional Needs

We recognise that, statistically, children with behavioural difficulties and disabilities are most vulnerable to abuse. The Club staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to signs of abuse.

If the Club has children with emotional and behavioural difficulties or challenging behaviours the staff will be supported to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents.

We are aware that children who may have communication difficulties are vulnerable to abuse because they are unable to express themselves to others. Such children will often exhibit changes in behaviour or signs and symptoms of abuse recognised by staff with a good knowledge of the child.

Staff will receive appropriate training in relation to Intimate Care. Staff will never carry out intimate care for a child if the child can do it for themselves. If support is required, staff will follow the child's intimate care plan. Unless a child has a particular need, staff should not accompany children into the toilet cubicle. * See Intimate Care Policy.

Safeguarding - Useful Numbers:

- South Gloucestershire Children's 'First Point' team- (01454) 866000.
- Ofsted: 0300 123 1231
- LSCB (Local Safeguarding Children Board) www.sgcyp.org

Sick Children and Accidents

The Club is committed to dealing efficiently and effectively with illnesses and emergencies that may arise while children are in our care, and helping to keep all staff and children safe from infectious and communicable diseases.

Paediatric First Aid

3.50

The Club recognises its responsibilities in providing adequate and appropriate equipment, facilities and personnel to enable suitable first aid to be given to the children in our care.

The Club has designated members of staff responsible for Paediatric First Aid and resuscitation. These persons have an up to date Paediatric First Aid certificate that meets the criteria set out by Ofsted. The certificate must be updated every 3 years. There is always at least one member of staff onsite who is a qualified Paediatric First Aider. However, due to our commitment to continual evaluation and improvement, the Club endeavours to train as many staff members as possible in Paediatric First Aid to ensure the safety and welfare of children at all times.

3.50

The First Aid box will be regularly checked to ensure its contents are up to date, in good condition and fulfil the criteria set out in the Health and Safety (First Aid) Regulations 1981.

The location of the First Aid box, and the names of any other qualified first-aiders, will be clearly displayed at Club.

A First Aid box will be taken on all site visits or outings. This is the responsibility of the designated Paediatric First Aider, who is usually the Play Leader in charge.

All parents/carers are asked in the Membership form 'consent' section to complete and sign for Emergency Medical Treatment, enabling the Manager or any member of staff so empowered, to give permission for emergency medical treatment for their child in the event of a major accident or illness.

In the Event of a Minor Accident or Illness

- The First Aider will be notified and take responsibility for deciding upon the appropriate action
- The First Aider will assess the situation and decide whether the child needs to go straight to hospital or whether they can safely wait for their parent/carer to arrive
- If the child needs to go straight to hospital, an ambulance will be called. The parent/carer will also be contacted. A member of staff will accompany the child to the hospital and will consent to medical treatment being given, so long as Emergency Medical Treatment has been completed
- The child's medical form should be taken to hospital

3.50

- All such accidents or incidents will be recorded in detail and logged in the Incident Record Book or the Accident/Near Misses Record Book. Parents/carers will be asked to sign in the relevant section of the book to acknowledge the incident or accident and any action taken by the Club and its staff. If this is not possible then the parent/carer should be informed on the same day or as soon as possible.
- The Manager and other relevant members of staff should consider whether the accident or incident highlights any actual or potential weaknesses in the Club policies or procedures, and act accordingly, making suitable adjustments where necessary
- Parents/carers will be made fully aware of the details of any incidents involving their child's health and safety, and any actions taken by the Club and its staff

In the Event of a Serious Accident, Illness, Injury or Death

3.51

- Ofsted will be notified by the Manager within 14 days

The designated First Aider will be notified and take responsibility for deciding upon any appropriate action.

- If the child is judged to be able to safely remain at the Club, the First Aider will remove the child from the activities and, if appropriate, treat the illness/injury themselves
- If the child is feeling sufficiently better, they will be resettled back into the activities, but will be kept under close supervision for the remainder of the session
- At the end of the session, the First Aider will fully inform the parent/carer of the illness/accident and any treatment given
- If the injury cannot be treated by the First Aider, but does not warrant hospitalisation (or the child continues to feel unwell or requests to go home) the parent/carer will be contacted immediately and asked to collect their child. Until the parent/carer arrives, the child will be kept under close supervision and as comfortable as possible
- All such accidents and incidents will be recorded in detail and logged on to an Incident Record sheet or the Accident Record sheet. Parents/carers should sign to acknowledge the incident and any action taken

The Manager and any other relevant staff should consider whether the accident or incident highlighted any actual or potential weakness in the Club's policies or procedures, and make suitable adjustments if necessary.

If a child has had to go home prematurely due to illness, they should remain at home until they are better for at least 24 hours, or according to the times set out in the infectious and communicable diseases policy.

If a member of staff becomes ill at work, similar restrictions on their return will apply.

Infectious and Communicable Diseases

If any infectious or communicable disease is detected on the Club premises, the Club will inform parents/carers in writing as soon as possible. RIDDOR (where relevant) and Ofsted will also be informed of any infectious or communicable diseases discovered on the Club premises.

Head Lice

When a case of head lice is discovered at the Club, the situation will be handled sensitively. The child concerned will not be isolated from other children, and there is no need for them to be excluded from activities or sessions at the Club.

When the child concerned is collected, their parent/carer will be informed in a sensitive manner. Parents/carers will be informed as quickly as possible of the head lice but the child concerned will not be mentioned. Parents will be given advice and guidance on treating head lice. Staff should check themselves regularly for lice and treat whenever necessary.

Minimum Exclusion Periods for Illness and Disease Guidelines

Disease/Condition Exclusion Period

- Antibiotics prescribed First 24 hours
- Chicken Pox – until the last scab has dried and scabbed up
- Conjunctivitis 24 hours or until the eyes have stopped 'weeping'
- Diarrhoea 24 hours
- Diphtheria 2-5 days
- Gastro-enteritis, food poisoning, 24 hours or until advised by the doctor
- Salmonella and Dysentery
- Glandular Fever Until certified well
- Hand, Foot and Mouth disease During acute phase and while rash and Ulcers are present
- Hepatitis A 7 days from onset of jaundice and when recovered
- Hepatitis B Until clinically well
- High temperature 24 hours
- Impetigo Until the skin has healed
- Infective hepatitis 7 days from the onset
- Measles 7 days from when the rash appeared
- Meningitis Until certified well
- Mumps 7 days minimum or until the swelling has subsided
- Pediculosis (lice) Until treatment has been given
- Pertussis (whooping cough) 21 days from the onset
- Plantar warts Should be treated and covered
- Poliomyelitis Until certified well
- Ringworm of scalp Until cured
- Ringworm of the body Until treatment has been given
- Rubella (German Measles) 4 days from onset of rash
- Scabies Until treatment has been given
- Scarlet fever and streptococcal 3 days from the start of the treatment
- Infection of the throat Until declared free from infection by a doctor
- Tuberculosis Until declared free from infection by a doctor
- Typhoid fever Exclusion not necessary
- Warts (including Verruca) Exclusion not necessary (Sufferer should keep feet covered)

This list is not necessarily exhaustive, and staff are encouraged to contact local health services if they are in any doubt.

Smoking, Alcohol and Drugs

Drugs

3.19

Staff, students or volunteers who arrive the Club clearly under the influence of illegal drugs, will be asked to leave immediately and disciplinary procedures implemented.

If a child is found in possession of illegal drugs on the premises, their parent/carer will be informed.

If staff are found in possession of illegal drugs, serious disciplinary action will follow.

3.19

In cases where staff are taking prescribed medication that may affect their ability to function effectively at work, the Manager must be informed as early as possible and a risk assessment will be completed if needed.

Parents and Carers

If a member of staff has good reason to suspect that a parent/carer is under the influence of illegal drugs or alcohol when they drop off or collect their child, they have a duty to inform the Manager/Lead Practitioner, according to the provisions of the Safeguarding policies.

In such circumstances, the Manager/Lead Practitioner will then be responsible for deciding upon appropriate course of action, ensuring that the safety and protection of the child remains paramount at all times.

Staff will make all possible efforts to ensure that children are not allowed to travel in a vehicle driven by someone who is clearly under the influence of illegal drugs.

Where an illegal act is suspected to have taken place, the police will be called.

Alcohol

Staff, students and volunteers who arrive at the Club clearly under the influence of alcohol, will be asked to leave immediately and disciplinary procedures will follow.

If a child is found in possession of alcohol on the premises, their parent/carer will be informed immediately or by the end of the session at the very latest. Staff are strongly advised not to bring alcohol onto the Club's premises.

If a member of staff has good reason to suspect that a parent/carer is under the influence of alcohol when they drop off or collect their child, to the extent that the safety of the child is threatened, they have a duty to inform both the Manager/Lead Practitioner, according to the provision of the Safeguarding policy.

The Manager and the Lead Practitioner will then be responsible for deciding upon the appropriate course of action, ensuring that the safety and protection of the child remains paramount at all times. Staff will make all possible efforts to ensure that children are not allowed to travel in a vehicle driven by someone who is clearly over the legal alcohol limit.

Where an illegal act is suspected to have taken place, the police will be called.

Smoking is not permitted anywhere on the premises- this includes both inside and outside area. This rule applies equally to staff, students, volunteers, children, parents/carers or any other visitors. Areas being used by children at any time must never be smoked in.

If a child is found in possession of cigarettes on the premises, they will be confiscated and their parent/carer informed at the end of the session.

Wild About Play Staff Disciplinary

The Club will maintain a well-motivated, highly skilled and professional staff team. However, occasionally action will need to be taken to encourage improvement in individual behaviour and performance.

If a member of staff is subject to disciplinary action, fair and consistent procedures will be employed. Investigations will be non-discriminatory and apply equally to all staff irrespective of sex, marital status, sexual preference, race or disability.

Staff will be given the opportunity to state their case, and be accompanied by a colleague or Trade Union representative of their choice, during any part of the disciplinary process.

Staff will not be dismissed for a first breach of discipline except in the case of gross misconduct (see below).

Either the Manager or Deputy will conduct investigations.

Staff have a right to appeal against any disciplinary action taken against them.

The Staff Disciplinary Procedure operates as follows:

Informal Discussion

Before taking formal disciplinary action, the Manager will make every effort to resolve the matter by informal discussions with parties concerned. If a satisfactory outcome or improvements are not reached disciplinary procedures will be formally implemented.

Formal Verbal Warning

The Manager will give a formal warning to the member of staff. The Manager will notify and explain the reason for the warning. They will further be informed of their right of appeal. A brief note of warning will be kept on the staff records. After 6 months, it will be disregarded (subject to satisfactory conduct and/or performance).

Written Warning

If, following a formal verbal warning, there is insufficient improvement in standards, or if a further incident occurs, a written warning will be issued. This will state the reason for the warning and that, if there is no satisfactory resolution after a further month, a final written warning will be given. A copy of this first written warning will be kept in the staff records, but will be disregarded after 12 months, subject to satisfactory conduct and/or performance.

Final Written Warning

If the member of staff's conduct or performance remains consistently unsatisfactory, or if the misconduct is sufficiently serious, a final written warning will be given making it clear that any further breach of the standards, or other serious misconduct, may result in the employee's dismissal.

A copy of the warning will be kept in the Club records, but will be disregarded after 24 months, subject to satisfactory conduct and/or performance. The warning will state clearly that dismissal will result from a failure to comply.

In certain exceptional circumstances, a member of staff may receive a Final Written Warning that will

remain on the Club records indefinitely. This course of action will follow when a member of staff has only avoided dismissal due to extenuating or mitigating circumstances.

Gross Misconduct

If, after investigation, it is deemed that a member of staff has committed an act of the following nature, dismissal will be the normal outcome:

- Child abuse (for further details refer to the Safeguarding Policy)
- Serious infringement of health and safety rules (refer to the Health and Safety policy)
- Assaulting another person
- Persistent bullying, sexual or racial harassment
- Being unfit for work through alcohol or illegal drug use
- Gross negligence that either causes or might cause injury, loss or damage to persons or property
- Theft, fraud or deliberate falsification of the Club documents
- Deliberate damage to Club property
- Being an unfit person under the terms of the Care Standards Act 2000 or the Children's Act 1989

While the alleged incident of gross misconduct is being investigated, the individual concerned is likely to be suspended, during which time normal pay levels will prevail. Such suspension is not to be regarded as a form of disciplinary action and will be for as short a period as possible. Any decision to dismiss will be taken only after a full investigation.

If the staff member has been found to have committed an act of gross misconduct, they will be dismissed without notice.

Appeals

Staff wishing to appeal against a disciplinary decision, must do so in writing and within 15 working days of the decision being communicated. Appeals will be dealt with as quickly as possible and within at least a further 15 days. If possible, the Manager, or a senior member of staff who was not involved in the original disciplinary action will hear the appeal and impartially adjudicate the case.

At all stages of the procedure, the right to appeal will be confirmed as part of the warning, suspension or dismissal letter.

Staff Employment and Recruitment Policy

The Club is committed to using robust recruitment procedures that safeguard children and offer equal opportunity. The procedures set out below will be followed when recruiting staff and volunteers. All Managers who appoint staff should be aware of the safe recruitment practices.

All vacant positions will be advertised. Job adverts will include a clear message about the Club's commitment to safeguarding and promoting the welfare of children.

Persons wishing to apply will be sent an application form, job description and a copy of the Club's Safeguarding policy.

The Club job application forms include:

- A declaration that all information is correct
- A section under the rehabilitation of offenders Act that asks if the applicant has been awaiting a verdict, convicted, cautioned or court martialled for any relevant offence
- Two referees (one of which should be the last employer)
- The Management reserve the right to contact the candidate's last employer, as indicated on the application form, even if they are not named as a referee

Referees will be asked if they have any child protection concerns about the candidate, even if they came to nothing.

Referees will be contacted directly and references received prior to selection for interview.

The Management will select suitable candidates for interview. Candidates will be invited to attend interview and will be asked to bring along three forms of identification and any relevant qualification certificates, which will be photocopied.

The Manager will follow up on any gaps in the candidate's employment history rigorously and ensure that they are satisfied with the explanation given. The Manager will undertake additional checks if necessary.

Enhanced DBS checks will be carried out for all of the persons involved at the Club including those who work directly and indirectly with children, or have access to children's information.

The Manager will ensure that no newly appointed worker is permitted to work unsupervised with children unless their DBS has come back and it is clear.

If the Club is awaiting an outcome from the DBS check and have decided to employ the worker subject to the outcome of the DBS, the staff member will not yet be left unsupervised with children.

The Club will not employ staff or volunteers that have been convicted of an offence of have been subject to an order that disqualifies them from registration under regulations made under schedule 9A of the Children's Act 1989. Criminal record checks will be updated every three years.

The Management are aware of Asylum and Immigration Act requirements and therefore will check the ability of all new starters to work in the UK. Candidates are expected to provide documents confirming their status, usually driving licences, passports, and NI number.

If unsure about robust recruitment practices, the Club will seek support from South Gloucestershire's Early Years Recruitment team. The Manager/staff can contact Anna Bull (Recruitment Development Worker) on (01454) 868674/ anna.bull@southgloucs.gov.uk

Staff Induction

New members of staff will be issued with a job description and a copy of the Club's policies and procedures. Staff will also undergo an induction process during the first month of their employment and be assigned a mentor to help them settle in.

Staff should introduce the new member of staff to colleagues, children and parents/carers.

Policies and procedures should be shown and explained to staff. They should be given a copy and time allowed for discussions around the practical implications of the Club policies and practices.

Particular attention should be drawn to the child protection and health and safety related policies.

Staff should be made aware of the Club's obligation to be aware of the Early Years Foundation Stage curriculum.

As part of the induction, the mentor will discuss and talk through everyday practices of the Club.

These will include:

- Staffing structure
- Staff shifts/rota
- H&S including evacuation
- Rest breaks
- Booking of annual leave
- Staff absences
- Day to day management and running of the Club
- Responsibilities
- Code of conduct (including confidentiality)
- Appraisal and supervision
- Training and qualification development
- Policies and procedures
- Whistle blowing

Showing new staff around the premises should include:

- Fire exits and assembly point
- Toilets
- Staff bags/coats/phone locked cupboards
- Kitchen
- Club desk (including telephone, office equipment and documentation)
- Storage areas
- First aid box
- Collection points
- Equipment that belongs to the Club
- Outside play areas and boundaries
- Any hazards to be aware of

Staff Development and Training

The staff are the Club's most valuable resource, as it is only through their commitment and effort that good quality provision can be both established and maintained. We are therefore committed to providing good training and development opportunities for staff so that they are able to perform their roles both efficiently and effectively.

The Club is committed to providing for staff:

- A full induction process
- A regular system of appraisals
- An up to date record of staff qualifications and training

This will help to ensure that staff development needs are being met and that staff training and qualifications are meeting the requirements of the Club and The Early Years Foundation Stage.

Staff Meetings

Staff meetings take place every month, usually being every four weeks and on a Monday evening.

Staff meetings allow time for planning and problem solving, information and task sharing and acknowledging work issues. There are also opportunities for staff to take part in training, reflect on their work performance and review any difficulties they may be facing.

Staff Appraisal

Appraisals will take the form of annual meetings between staff and the Manager or Deputy. They will be used to identify current knowledge, skills areas for future development and potential training needs.

Supervision

Supervisions will take the form of regular discussions between staff and the Manager, and will be an opportunity for reflecting on recent professional progress, as well as the targets set, and issues raised, during appraisals.

The appraisal and supervision process will be used to build up a Personal Development Plan, which will be revised during supervisions to ensure that staff needs are both identified and acted upon as they arise. It is the joint responsibility of both the member of staff and the Manager to ensure that the plan is kept up to date and that all decisions are followed through.

Training Opportunities

The Club will do all it can to support staff that are working towards improving their qualifications and training experience. All staff are encouraged to take up training opportunities to expand their professional development and ensure an up to date knowledge of childcare issues.

It is the Manager's responsibility to identify and promote suitable training courses for staff and strongly encourage them to take advantage of these. Support will be given to help staff overcome any barriers to accessing such training.

Staff will be expected to attend training courses and update skills as and when requested by their Manager.

Staff Policy

The Club is committed to promoting family friendly employment practices to help staff balance work and family commitments. The Club will make every effort to be flexible with staff and to promote harmonious working relations, through trade unions and other organisations.

The Club will work with staff and their representatives to ensure that all employment legislation and regulations - including Statutory Maternity Pay, Statutory Paternity Pay, Parental Leave, Statutory Sick Pay and Working Time Regulations - are abided by.

In return, the Club expects honesty, loyalty and diligence from its staff.

The written detail of employment contracts, including rates and levels of pay and other terms and conditions, are the responsibility of the Manager.

Staff should be aware that the minimum-staffing ratio for Early Years Children not yet attending school is 1:8. However in some circumstances the ratio of staff to children may need to be higher - for example where there is one EYFS child and the rest are aged 4 to 7 years and attending school. For children aged over eight, the Club will make every effort to maintain a ratio of staff to children of at least 1:10. Our insurance company currently insures us to have a 1:10 ratio for under 8s and 1:15 ratio for over 8s.

Code of Conduct

All members of staff are expected to conduct themselves at all times in a professional, courteous, helpful, warm and consistent manner.

Members of staff are expected to display both knowledge and understanding of child protection, multicultural issues and a commitment to treating all children as individuals and with equal concern and respect.

Members of staff will have regard for wearing appropriate clothes and shoes when working with children and with awareness of health and safety issues.

The Manager will ensure that space is made during the working day for staff to take regular breaks, ensuring that no member of staff exceeds the legal limit of six hours consecutive work without a break.

Under no circumstances should any arguments or disagreements between members of staff occur in the presence of children or parents/carers.

No smoking, alcohol or drug use is allowed on Club premises.

No bullying, swearing, harassment or victimisation will be tolerated on the Club premises.

Offensive behaviour such as sexist or racial language or harassment will not be tolerated.

All staff are expected to treat everyone respectfully at all times and inappropriate behaviour may lead to disciplinary action.

Confidentiality

Staff have a right to privacy, as do children and their parents/carers. Personal details should not be discussed except in exceptional circumstances.

The Manager, staff, volunteers and any other individual associated with the running or management of The Club will respect confidentiality by:

- Not discussing individual incidents, behaviour or information of children in front of parents/carers
- and other children
- Not discussing confidential matters about children with other parents/carers
- Not discussing confidential matters about parents/carers with children or other parents/carers
- Not discussing confidential information about other staff members
- Only passing sensitive information, in written or oral form, to relevant people

In circumstances where staff have good reason to believe that a child is at risk, or is likely to be at risk, of child abuse or neglect, the Child Protection policy will override confidentiality on a 'need to know' basis.

Staff failing to show due regard for confidentiality will be liable to disciplinary action under the provisions of the Staff Disciplinary Procedures policy.

If a staff member works in more than one setting they must be aware that they must not share information regarding children and families between settings. If there are concerns about a child's protection please refer to the Safeguarding policy.

Under no circumstances should staff provide any information about children to any branch of the media. All media enquiries should be passed in the first instance to the Manager.

Valuing Staff

The Manager will arrange regular staff meetings where all staff are able to discuss and contribute in a positive manner.

The Manager should encourage staff to contribute to the development and quality of the programme of activities provided.

All staff should have an annual appraisal and will be encouraged to attend training courses to enhance their skills.

The Manager will make himself or herself available to staff to discuss any concerns relating to the Club.

Absences

Staff should negotiate statutory annual leave with the Manager, in all cases giving as much notice as possible. If staff require compassionate leave this should be negotiated with the Manager.

If staff are unable to attend work due to illness of other medical condition, they must contact the Manager prior to the start of the working day.

Staff should indicate why they are unable to attend work and when they expect to return. On returning to work, staff should complete a self-certification form for any sickness absence. For absences of longer than seven days, a doctor's certificate must be submitted.

The Manager will keep records of all sick leave, other absences and lateness. The Manager will ensure that suitable and sufficient contingency plans are in place to cover emergencies, expected staff absences, staff breaks, holidays and sickness.

Whistle blowing Procedure

Raising a Concern

Staff should raise concerns with the Manager. Concerns should be raised in writing and include:

- Reference to the fact that it is a whistle blowing disclosure
- The background and history of the concerns
- Names, dates and places (where possible)
- The reasons why the worker is particularly concerned about the situation

Staff who feel unable to put concern in writing, can telephone or meet either the Manager or Deputy Manager.

Responding to a Concern

In order to protect individuals, initial enquiries (usually involving a meeting with the individual raising the concern), will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Concerns or allegations that raise issues that fall within the scope of other policies/procedures, will be addressed under those procedures.

Some concerns may be resolved at this initial stage simply, by agreed action or an explanation regarding the concern, without the need for further investigation.

The action taken will depend on the nature of the concern, The matters raised will be investigated internally or in the case of a child protection allegation against a staff member:

- Advice will be sought from the LADO
- Ofsted will be notified
- The matter may be referred to the police if necessary

Support and Protection

'Blowing the whistle' can be difficult and stressful. The Club will ensure that they do their best to protect the identity of the worker raising the concern and that he/she is not subject to harassment or victimisation from others.

Investigation

The appropriate person/s will investigate the concerns thoroughly, ensuring that a written response can be provided within ten working days.

The response should include details of how the matter was investigated, conclusions drawn from the investigation, and whom to contact should the worker be unhappy with the response and wish to raise the matter.

If the investigation cannot be completed within the timescale above, the worker should receive a response that indicates:

- Progress to date
- How the matter is being dealt with
- How long it will take to provide final response

Untrue Allegations

If a worker makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against that worker. If, however, there is clear evidence that a worker has made malicious or vexatious allegations, disciplinary action may be taken against that individual in accordance with the Club Staff Disciplinary procedure.

Wild About Play

Unfounded Allegations

Following investigations, if an allegation is confirmed as unfounded this should be notified to the worker who raised the concern, who will be informed that the Club deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

Grievance/Complaints at Work

The Club recognises that there may be times when employees are unhappy about 'things at work', and encourages you to raise issues/problems as they arise so that they can be resolved quickly, fairly and to the satisfaction of all concerned, and prevented from developing into more serious disputes.

You have the right to raise a grievance (ie a complaint or problem), about your treatment/conditions at work, ie matters that:

- Arise from your work with the Club
- Directly affect you as an individual

How to Raise a Grievance

Informal Stage

Where you discuss with the Play Leader the concern(s) that you have, aiming to resolve them as quickly as possible.

If the grievance is in relation to the Manager, employees may submit their grievance to the next senior member of staff.

Employees may also wish to refer to the Club's Whistle Blowing policy.

Formal Stage

If your complaints/concerns remain unresolved, despite informal discussions, you should put your grievance(s) in writing to the management stating:

- The details and nature of their complaint
- The reasons why you are not satisfied with the outcome/response from informal discussions
- That you wish the matter to be addressed as a formal grievance
- Desired outcome at this stage

You may be accompanied and/or represented at this stage. Your representative may submit the grievance on your behalf.

Meeting

Representatives (maximum of two) of the management will arrange to meet with you hear the full facts of the situation, and to attempt to find a satisfactory solution. You have the right to be accompanied and/or represented at this meeting, which should be held within ten working days of receipt of the written complaint.

This meeting should be conducted as informally as possible to encourage a frank and full discussion of the issues and to facilitate a satisfactory solution for all concerned. In the majority of cases a satisfactory solution will be achieved through these discussions and the Manager will be able to deliver a decision and agree any action(s) at the end of the meeting. This outcome should be confirmed in writing (by the Manager) within five working days of the meeting.

Students will be encouraged to discuss their individual learning needs with the Manager when they start at the Club, and at regular intervals during their placement.

Students required to conduct child studies beyond the Club's normal activities (ie conducting a survey or a group based activity) as part of their course will need to obtain appropriate written consent from the parents/carers of the children concerned.

The Manager will ensure that students and volunteers undertake the full induction process given to permanent staff, as set out in the Club Staff Information Policy.

New students and volunteers will be allocated a member of staff who will have day to day responsibility for them and their needs while at the Club.

While on the placement, students and volunteers will be both allowed (and expected) to participate in all aspects of work at the Club, unless otherwise instructed by the Manager. Students and volunteers will attend staff meetings and be encouraged to contribute ideas and share opinions.

- We will ensure that we have up to date employers' liability insurance and public liability insurance, which covers both trainees and voluntary helpers
- The Manager, as requested by the Club's insurance company, must email the insurers to inform them of students or young work experience workers being present at Club.
- We require students and volunteers to keep to our confidentiality policy
- We cooperate with students' tutors in order to help students to fulfil the requirements of their course of study
- We communicate a positive message to students about the value of qualifications and training
- We ensure that trainees, students and volunteers placed with us are engaged in bona fide early years training, which provides the necessary background understanding of children's development and activities

Students and Volunteers

We believe that a placement for a student or volunteer at the Club is a valuable opportunity to build experience whilst learning about working within a childcare setting.

Equally, we appreciate the positive contribution that such committed and enthusiastic people can bring to the Club. The needs of the children are paramount. The Club will restrict the numbers of students and volunteers admitted at any particular time.

The Manager has overall responsibility for supervising and supporting students and volunteers while they are at the Club.

All students and volunteers must submit two character referees, and have up to date DBS check before they begin their placement at the Club.

The Manager will have formal written agreement with students and volunteers at the start of the placement, which will agree hours of work, dress code and expected behaviour within the Club. This agreement will also detail what the student or volunteer can expect from the Club. Students and volunteers must read, understand and sign the conditions of work before accepting or making a commitment to voluntary work.

Students and volunteers on placement should not be included in the staff to children ratio unless age 17 or over with competency in childcare. In this case, they should be attending as a regular volunteer and deemed to be competent. There will be at least two full members of staff on duty as well as the student or volunteer.

Regular supervision and appraisal sessions with the Manager and the designated member of staff will be established as a means of monitoring progress.

Students will be encouraged to discuss their individual learning needs with the Manager when they start at the Club, and at regular intervals during their placement.

Students required to conduct child studies beyond the Club's normal activities (ie conducting a survey or a group based activity) as part of their course will need to obtain appropriate written consent from the parents/carers of the children concerned.

The Manager will ensure that students and volunteers undertake the full induction process given to permanent staff, as set out in the Club Staff Information Policy.

New students and volunteers will be allocated a member of staff who will have day to day responsibility for them and their needs while at the Club.

While on the placement, students and volunteers will be both allowed (and expected) to participate in all aspects of work at the Club, unless otherwise instructed by the Manager. Students and volunteers will attend staff meetings and be encouraged to contribute ideas and share opinions.

- We will ensure that we have up to date employers' liability insurance and public liability insurance, which covers both trainees and voluntary helpers
- The Manager, as requested by the Club's insurance company, must email the insurers to inform them of students or young work experience workers being present at Club.
- We require students and volunteers to keep to our confidentiality policy
- We cooperate with students' tutors in order to help students to fulfil the requirements of their course of study
- We communicate a positive message to students about the value of qualifications and training

- We ensure that trainees, students and volunteers placed with us are engaged in bona fide early years training, which provides the necessary background understanding of children's development and activities

Suspensions and Exclusions of Children

The Club is committed to dealing with negative behaviour in a non-confrontational and constructive manner. Wherever possible, disruptive or challenging behaviour will be tackled collectively between staff and children in the Club. Such procedures are outlined in the Behaviour Management policy.

However, there are occasions when such strategies alone will not alter or prevent negative behaviour. In such cases, further action will be necessary, including reviewing a child's place at the Club, on either a temporary or permanent basis.

Staff will endeavour to support all children to develop appropriate behaviours within the play environment.

For those children who require extra support in order to behave in an appropriate manner, staff will work with parents and carers to establish a consistent, coordinated approach to developing successful strategies.

Children will only be suspended or excluded as a last resort, when there is no alternative action that could be taken, or when it is felt that other children and/or staff are potentially at risk. Wherever possible, the Club will give parents/carers time to make alternative arrangements for childcare during a period of suspension.

Persistent unacceptable behaviour from a child will result in the following:

Formal Warning

Staff will explain to the child why their behaviour is unacceptable and the consequences of any further such incidents. Children will be encouraged to discuss their behaviour, to explain their actions, and helped to develop strategies to avoiding repeat incidents.

Details of all warnings, suspensions, and exclusions will be recorded and kept on the child's records. Each warning should be discussed with the child concerned and their parent/carer. All staff will be made aware of any warnings given to a child. As a last resort, the Club has the right to temporarily suspend or permanently exclude a child in the event of persistent and irresolvable unacceptable behaviour.

Suspension

Only in the event of an extremely serious or dangerous incident will a child be suspended from The Club with immediate effect. In such circumstances, the child's parent/carer will be contacted immediately and asked to collect their child, even if the child normally signs themselves out. Children will not be allowed to leave the premises until a parent/carer arrives to collect them.

After an immediate suspension has taken place, the Manager will arrange a meeting with the child concerned and their parent/carers to discuss the incident and decide if it will be possible for them to return to the Club.

Suspensions and exclusions should be seen as consistent, fair and proportionate to the behaviour concerned.

In setting such a sanction, consideration should be given to the child's age and maturity. Any other relevant information about the child and their situation should also be considered. If appropriate, help and advice will be sort from concerned professionals in order to plan for the child or young person's

Uncollected Children

The Club has the highest regard for safety of the children in our care – from the moment they arrive to the moment that they leave.

At the end of every session, the Club will ensure that all children are collected by a parent, carer or designated adult, in accordance with the Arrivals and Departures policy. If for some reason a child is not collected at the end of the of a session, the following procedures will be activated.

- The Manager/Play Leader will call the parent, carer or designated adult, and use any other emergency contact details available in order to try to ascertain the cause for the delay, and how long it is likely to last.
- Messages will always be left on any answer phone requesting a prompt reply
- Whilst waiting to be collected, the child will be supervised by at least two members of staff who will offer them activities and as much support and reassurance as is necessary
- If, after repeated attempts, no contact is made the Manager/Play Leader will call Social Care for advice after 30 minutes of the Club closing
- The Club will act on advice of Social Care
- Unless absolutely necessary the child will not be taken to the home of a member of staff, or away from the Club premises, in the course of waiting for them to be collected at the end of a session
- The child will remain in the care of the Club's two staff members until they are collected by the parent, carer or designated adult, or alternatively placed in the care of Social Care
- In the event of Social Care being called and responsibility for the child being passed to a safeguarding agency, the Manager will attempt to leave a further telephone message with the parent/carer or designated adult's answer phone.
- Furthermore, a note will be left on the door of the Club premises informing the parent, carer or designated adult of what has happened.
- The note will reassure them of their child's safety and instruct them to contact the local Social Care Department. You may want to consider leaving a note at the family home
- If a parent, carer or designated adult is late in collecting their child, the Play Leader shall inform the Manager and book keeper/administrator.
- Incidents of late collection will be recorded by the Manager/Play Leader and discussed with parents/carers at the earliest opportunity. Parents and carers will be informed that late collection will result in the imposition of a £10 fine for lateness and £10 or part thereof for every ten minutes after closing time/end of session. or the loss of their child's place at the Club.

Use of the Internet

The Internet is a very useful resource to the Club. It is used by staff to research qualifications, source useful information on play and craft activities to name only a few. Children also benefit from having access to the Internet for researching information for projects as well as following interests and hobbies.

The Club staff are aware that inappropriate websites must not be accessed by anyone using the Club.

Parents and carers will be asked for signed permission before their child may use the Internet. Staff must be vigilant when children are accessing the internet.

The Club will have the following safeguards:

It is explained to children and young people:

- ❖ What they should do if they encounter something inappropriate when using the Internet
- ❖ Never to give our personal information, which could lead to you or other individuals being identified
- ❖ Be aware that people are not necessarily truthful and may not be who they say they are
- ❖ Be aware that some people are prepared to spend long time gaining the trust of young people
- ❖ Never arrange to meet anyone without the express knowledge and permission of a parent and carer
- ❖ who should accompany you
- ❖ Keep passwords responsibly
- ❖ Not to copy or delete others' work
- ❖ The Club will ensure that the following safeguards are in place:
 - ❖ Filtered internet feed
 - ❖ Staff will supervise the use of the internet
 - ❖ The computers temporary internet files will be checked to monitor which sites are being accessed
- ❖ If a member of staff or child encounters something inappropriate whilst surfing the Internet:
- ❖ The child must tell a member of staff immediately
- ❖ The member of staff must notify the Manager
- ❖ The incident should be recorded and signed by the parent
- ❖ Records should be stored in the staff or child's record

The Club will ensure that the computer has an up to date virus checker and firewall.

Staff will not use the Internet for personal use during sessions unless the Manager has given permission.

Any member of staff found accessing or allowing children or young people to access inappropriate websites will be subject to the Club Disciplinary Procedure.

Visits and Outings

The Club believes that visits and outings play an important and enriching role in the programme of activities that we provide for children.

If possible a member of staff will carry out an exploratory visit of the proposed destination so as to pre-empt any potential difficulties.

A risk assessment will be carried out before the trip. This should include consideration of the journey, any transportation involved, ratios, and contingency arrangements in case of break down, illness etc.

If a prior visit is not possible, the Manager will request all relevant information and a risk assessment statement from the venue (where available). Risk assessment findings will be shared with all those attending the trip.

The Club will ensure that the activities planned are covered through the Club insurance.

The Club will make every effort to involve children in the planning of a visit or outing. Staff will explain to children the aims and objectives of the event, along with what is expected of them in terms of their behaviour and contribution.

Children will be talked through any potential safety hazards and told to remain with staff at all times. All children will be given a sticker/badge/hi-viz vest with the Club's name and contact mobile telephone number. Staff will explain to children what to do in an emergency, including designating a suitable meeting point.

Parental Consent

The Club booking form will act as consent for children to take part in trip dates. Invoices, newsletters and programmes to parents/carers will give detailed information about the proposed event. Only parents or the person with legal guardianship can sign their approval for their child to attend.

This will include:

- Destinations
- Date of trip
- A full programme of activities
- Any costs involved
- The mode of transport being used
- Approximate arrival and departure times
- Suitable clothing/change of clothing required
- Suggested amount of spending money

The following information should also be considered and requested and held on the Emergency Contacts list for all children:

- Parents/carers name
- Emergency contact number
- Childs name
- Childs date of birth
- Childs address
- Consent to apply sun cream
- Permission to take photographs
- Childs doctors name and address and telephone number
- Who will be collecting child

- Any concerns the child may have
- Does the child suffer from travel sickness
- Any special needs that the child may have
- Any dietary needs
- Any medication they may be taking -medication forms
- Any allergies the child may have

Parents/carers have the absolute right to withhold consent for a proposed visit or outing. Any child without a signed consent form will not be allowed to participate/attend on that day.

During visits and outings

On visits or outings, the minimum staff to child ratio will be 1:8, unless the children are over 10 in which case it can be 1:10; subject to the nature of the activity and the risk assessment.

Children will remain under close supervision at all times. The Manager/Play Leader will ensure that a full First Aid kit is on hand and a Paediatric First Aider is present.

Designated members of staff will keep mobile phones with them at all times and their numbers will be circulated to all parents/carers in advance of the visits and outings. These numbers will also be left at The Greenfield Club in case of an emergency.

A register will be taken at the beginning, middle and end of the visit or outing. Additionally, staff will take regular head counts.

A list of all members of staff and children participating in the visit or outing, along with relevant mobile phone numbers, will be taken with the staff on the trip and a copy left at Club with the remaining staff members being able to access this in an emergency.

Staff will carry out a review of the trip to identify the following:

- Did the children enjoy the trip?
- Was the trip appropriate for the children?
- Did the timings work?
- Did the staff ratios work?
- Did the cost of the trip stay within budget?
- Staff will ensure that both children and parents/carers are also involved in the review and will ensure their opinions are considered for future trips.

Waiting Lists

To ensure that admissions to the Club are offered on a fair and transparent basis, the following procedure will apply to the management of waiting lists:

- If, on making an enquiry about a place for their child, a parent/carer is informed that there is not currently a place available, the Club's waiting list procedure will be explained and activated on the parent/carer's behalf
- Parents/carers will be encouraged to submit their request for a place for their child to the Club in writing. The details of this request will be placed on the waiting list, in the order in which they are received.
- The waiting list will be kept and used on a 'first come first served' basis. The Club will advise the parent/carer of how long they are likely to have to wait before a suitable place becomes available. This information will only be an estimate and will not constitute a binding guarantee from the Club.
- When a vacancy at the Club becomes available, the Manager will contact the parent/carer highest up on the waiting list.
- If the parent/carer concerned no longer wishes to take up a place, the parent/carer of the next child on the list will be contacted.