



KEEN Policies and Procedures

This document was last reviewed on: **29th January 2019**

KEEN is registered in the UK as full name KEEN Oxford, a Charitable Incorporated Organisation (CIO) with registration number 1157084

Introduction to KEEN

We are an award winning, inclusive community organisation centred around a programme of social, recreational, and sporting activities. We think that everyone, regardless of their needs, should have equal opportunities to their peers to be meaningfully integrated into their community. In particular, we support and promote these opportunities for children and adults with a wide range of disabilities and/or special needs.

Our policies, procedures, and guidance

This document sets out the policies, procedures, and guidance and dictate how we work, recognising our duties in law, best practices within the sector, and the decades of experience that we have built up. Their content is monitored on an ongoing basis, and reviewed fully at least once annually.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a stylized, cursive script.

Jim McMahon
Chair of Trustees
19th January 2019

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Introductory Notes and Definitions

The purpose of this section is to provide the reader with an overview of what the KEEN community and our activities look like, so that our policies can be viewed and understood in this context.

Our legal status

KEEN is registered in the UK as full name KEEN Oxford, a Charitable Incorporated Organisation (CIO) with registration number 1157084. Our constitution, first established in March 2014 on the date of our incorporation is available upon request. Our current CIO was preceded by a Charity first registered with the Charity Commission in April 1988, full name Kids Enjoy Exercise Now (K.E.E.N).

The KEEN Community

The KEEN Community consists of four groups, (1) participants, (2) staff and trustees, (3) volunteers, and (4) other groups (including but not limited to: external service providers, visitors, parents, etc). The full membership criteria for each of these groups is set out within our policies. As all individuals involved with KEEN Activities must fall into one of these four groups, this provides a clear and unambiguous basis for deciding how to treat a particular individual.

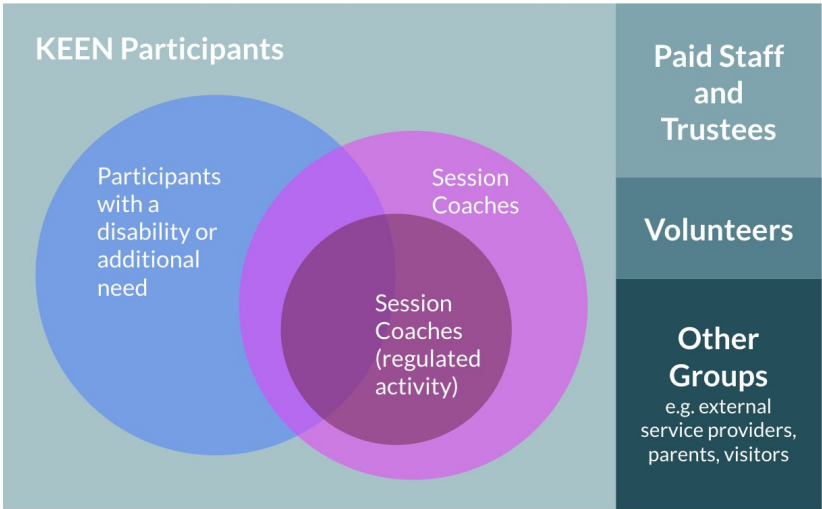


Fig. 1: Venn diagram of the KEEN Community

Individuals across different groups vary both in the responsibilities they hold, and the responsibilities due to them held by other groups within KEEN. These responsibilities, on both sides, are also set out clearly within our policies. The purpose of the rest of this section is to summarise the relations between each of these groups.

KEEN Staff and Trustees

The primary role of individuals within this group, as related to these policies, is to write, review, uphold and implement them, in accordance with our charitable aims and values. The Trustees of KEEN bear ultimate responsibility for doing so, although in effect many day to day responsibilities are delegated to our staff team including the Executive Director and Programme Coordinator. In the context of these policies then, it is our Staff and Trustees who hold most of the responsibilities towards the other groups below. These responsibilities are set out in detail in our contracts for Staff and Code of Conduct for Trustees. Their own needs specific to these groups are primarily with respect to charity and employment law.

KEEN Participants

The primary role of individuals within this group, as related to these policies, is to benefit from participation in KEEN Activities. In the context of these policies, this group is primarily the focus of responsibilities held by other groups towards them, including by our staff and trustees, first among them to provide a safe environment. However, participants can also hold significant responsibilities of their own towards others in the KEEN Community, and in particular other participants. These responsibilities are set out in detail in our Codes of Conduct for Participants and Session Buddies. Our participants have a range of needs to which we have a duty to attend, sometimes these are multiple and complex. Catering to these needs is the focus of key policies including our Health and Safety Policy and Safeguarding and Protection of Children and Vulnerable Adults Policy.

KEEN Volunteers

The primary role of individuals within this group is to support KEEN Activities, without being a participant themselves. In the context of these policies, this group is primarily the focus of responsibilities held by other groups towards them, including by our staff and trustees, first among them to provide a safe environment in which to volunteer. However, participants can also hold significant responsibilities of their own towards others in the KEEN Community, and in particular our participants. These responsibilities are set out in detail in our Codes of Conduct for Volunteers. Needs.

KEEN Other Groups

The primary role of individuals within this group is involvement in KEEN Activities without being a participant, staff member, trustee, or volunteer themselves. For example, this could be as a parent attending a KEEN Activity, or as an external service provider (sports coaches, bands, drama teacher, art group, etc). In the context of these policies, this group is primarily the focus of responsibilities held by other groups towards them, including by our staff and trustees, first among them to provide a safe environment in which to work. However, external service providers also hold responsibilities of their own towards others in the KEEN Community. These responsibilities are set out in detail in our Code of Conduct for External Service Providers. Needs.

Our activities

For up to date information on the activities of the charity, please see our websites www.keenuk.org and www.keenoxford.org where you will find our latest reporting and general information.

Definitions

KEEN: Our organisation, registered in the UK as KEEN Oxford a Charitable Incorporated Organisation (CIO) with registration number 1157084 (constitution available upon request).

KEEN Community: The group including all of and only the following groups: KEEN Participants, KEEN Staff and Trustees, KEEN Volunteers, and Other Groups directly involved in KEEN Activities.

KEEN Activity or KEEN Activities: As defined at the sole discretion of the Trustees, but including (1) all KEEN Sessions, and (2) activities which could reasonably be understood as relating to KEEN business and which involve at least one member of our Staff team or Trustees.

KEEN Sessions: Any of the following sessions delivered by KEEN: KEEN Teens, Zig-Zag, Allsorts, GrEAT Social, GrEAT Sports, KEEN Plus, GrEAT Plus.

Additional Needs: Individual conditions including but not limited to: Physical Disabilities, Learning Disabilities, Learning Difficulties, and Special Needs.

KEEN Staff and Trustees: Contracted staff and Trustees of KEEN. KEEN currently employs two members of staff: our Executive Director and Programme Coordinator, and has seven trustees.

KEEN Staff Supervisor: The member of KEEN Staff or Trustees present at and in overall charge of any given KEEN Activity. All KEEN Activities are overseen by a KEEN Staff Supervisor as a matter of policy.

KEEN Participant: Any person fulfilling the membership criteria as defined in section xx of our Participant Policy.

KEEN Participant with Additional Needs: Any person fulfilling the membership criteria as defined in our Participant Policy and with an Additional Need as defined above.

KEEN Session Buddy: Any person fulfilling the membership criteria as defined in our Participant Policy

KEEN Regulated Buddy: Any person fulfilling the membership criteria as defined in our Participant Policy

KEEN Volunteer: Any person fulfilling the membership criteria as defined in our Volunteer Policy.

External Service Provider: Any person fulfilling the membership criteria as defined in our Other Groups Policy

Responsible Adult: A person or persons responsible under UK law for a KEEN Participant and registered with us as such. This is normally a parent, guardian, or carer.

Regulated activity: Regulated activity refers to certain roles carried out by applicants in relation to children and vulnerable adults. It covers various types of activities which, by their nature, would entitle an individual to an enhanced DBS check with applicable barred lists.

KEEN Buddy: A participant in the KEEN Buddies Scheme.

Buddy visit: The primary activity under the Buddies Scheme. A Session Buddy meets up with their Buddy to undertake an activity, normally of a length of around 2-3 hours.

KEEN Safeguarding Officer: Either the DSO or children protection deputy.

KEEN Equality, Diversity, and Inclusion Policy

KEEN has adopted equality, diversity and inclusion as core values and places all its policy development in the context of the objectives of:

- ensuring that all individuals who come into contact with KEEN are treated with dignity and respect
- ensuring that the opportunities KEEN provides are made available on a non-discriminatory basis,
- providing a safe, supportive and welcoming environment for everyone

Defining equality, diversity, and inclusion

Equal treatment involves much more than simply treating everyone alike; it requires a recognition that some groups and individuals have particular and specific needs that need to be met if they are to enjoy equal access to all that KEEN offers. We recognise that KEEN may need to provide its services in a range of different or flexible ways, in order to ensure genuine equality of access or opportunity for groups and individuals who approach those services from a position of persistent and long-standing disadvantage.

Valuing **diversity** involves an acknowledgement of the benefits and intrinsic worth derived from the range of differences within our community, and fostering it as a strength. We aim to celebrate and to value the differences between individuals' cultural, social and intellectual contribution to KEEN and will seek to promote greater mutual understanding between groups and individuals who reflect these differences, and will seek to utilise the talents and experiences that each and every individual can bring to the institution.

Inclusion involves KEEN and its staff in designing and operating flexible services, practices and procedures that take appropriate account of the needs of everyone, whether they are existing or potential members of a group within the KEEN Community. For example, all aspects of the KEEN experience must be accessible to people with the range of disabilities that are found in the communities that we work with..

Our core principles

KEEN endorses wholeheartedly the principles of the Equality Act 2010 and is committed to the positive promotion of equality, diversity and inclusion amongst all groups within the KEEN community. To achieve this KEEN will:

- ensure that no unlawful discrimination occurs in the conduct of KEEN's work; advance equality of opportunity between people who share the 'protected characteristics' that are listed below, and all other individuals within the KEEN Community

- foster positive relations between people who share the 'protected characteristics' and those who do not

KEEN will give protection against unfair discrimination on the grounds of:

- age
- disability
- ethnicity (including race, colour and nationality)
- gender
- gender reassignment
- marriage or civil partnership
- pregnancy or maternity
- religion, belief
- sexual orientation

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Participant Policy

As a community led organisation, our participants are at the heart of what we do, and together constitute the largest group of individuals within the KEEN Community. This policy includes clear criteria for who our KEEN Participants are, which assists in ensuring that they are safe and well supported at KEEN Activities.

KEEN's ethos is one of equality and inclusivity, which extends to the groups who are able to participate at KEEN. Specifically, we welcome and encourage participants both with and without disabilities or additional needs.

Who our KEEN Participants are

To be involved in any KEEN Activity, an individual **must** fall into at least one of the following groups, having met all membership criteria of that group, as defined throughout this and our other policies:

- **KEEN Participants (including KEEN Participants with an Additional Need)**
- **KEEN Session Buddies**
- **KEEN Session Buddies (regulated activity)**
- KEEN Staff and Trustees
- KEEN Volunteers
- Other Groups

The groups in **bold** include all KEEN Participants, who are the focus of this policy. How these participant groups exist in relation to each other and other groups can be seen in fig.xx overleaf.

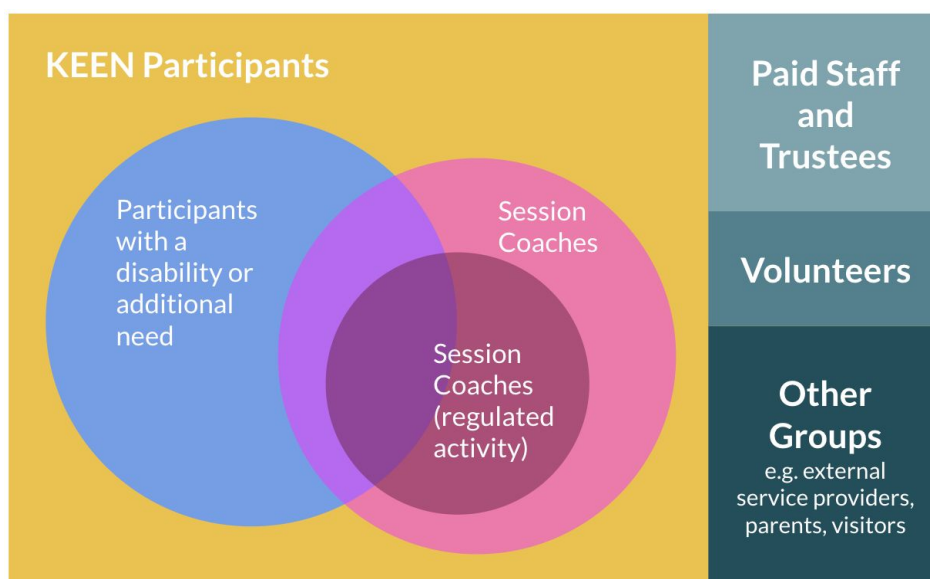


Fig.2: Venn diagram of the KEEN Community with KEEN Participant groups highlighted in yellow.

KEEN Participant Groups: Definitions

KEEN Participant/s: Any person fulfilling the membership criteria as defined in this policy below.

KEEN Participant/s with Additional Needs: Any person fulfilling the Membership Criteria as defined in this policy below and with an Additional Need. Around half of KEEN's participants have some kind of additional need. When this is the case there is further information that we need to receive from them during the application process so that we can cater to their needs and ensure a safe environment for them and for our other participants

Participants are currently identified as such at KEEN Activities by a sticky label name badge, written by the KEEN Staff Supervisor or Session Coordinator.

KEEN Session Buddies: Any person fulfilling the membership criteria as defined in this policy below. Session Buddies are a subgroup of KEEN Participants, who take on additional responsibilities including a specific support role with another participant, to ensure that they are included in our activities. Their additional responsibilities are set out in the **Session Buddy Responsibilities and Code of Conduct**.

Session Buddies are currently identified as such at KEEN Activities by a sticky label name badge, with both their name and the inscription 'SC', written by the KEEN Staff Supervisor or Session Coordinator.

KEEN Session Buddy (regulated activity): Any person fulfilling the membership criteria as defined in this policy below. This is a subgroup of our Session Buddies who are allowed to undertake **regulated activity**.

Session Buddies (regulated activity) are currently identified as such at KEEN activities by a sticky label name badge with their name and 'SC' written by the KEEN supervisory staff, and in addition, a 'KEEN' pin badge.

Membership criteria for KEEN Participants

To register as a KEEN Participant, individuals must meet all of the following three criteria:

1. Complete a **KEEN Participant Registration Form** (in either paper or electronic format, with assistance provided if required).

Where a potential participant has an Additional Need, information can be provided via our application form to allow production of a complete profile card describing the Participant's physical or learning disabilities, and/or special needs. Any further information regarding challenging behaviour and medical conditions can also be communicated

2. Read and agreed to abide by our **KEEN Participant Code of Conduct**
3. Sign the **KEEN Participant Declaration**

If an applicant is not able to carry out (1), (2) or (3) themselves, these can be completed by a responsible adult acting on their behalf.

In addition, the registration request must be formally accepted by the Executive Director. A registration request may be declined by the Executive Director at their discretion, including (but not limited to) where one of the following reasons apply:

- We cannot adequately or safely cater for the applicant's needs
- The applicant may pose an unacceptable risk to the safety of other KEEN Participants or cause them serious distress.
- The applicant may cause unacceptable damage to property during our sessions.

Membership criteria for KEEN Session Buddies

To register as a KEEN Session Buddy , individuals must meet all of the following criteria, in addition to the Membership Criteria for Participants above:

1. To be aged 16 or over
2. To have completed a **KEEN Session Buddy Registration Form**
3. Read and agreed to abide by our **Session Buddy Code of Conduct**
4. Signed our **Session Buddy Declaration**
5. Successfully complete the **OSCB Protecting and Safeguarding Online Training Course**

If an applicant is not able to carry out (2), (3), or (4) themselves, this can be completed by a responsible adult acting on their behalf.

In addition, the registration request must be formally accepted by the Executive Director. A registration request may be declined by the Executive Director at their discretion, including (but not limited to) where one of the following reasons apply:

- The applicant is judged unable to provide safe, appropriate and consistent care for Participants.

Additional Registration criteria for KEEN Session Buddies (regulated activity)

To register as a KEEN Session Buddy capable of undertaking regulated activity, individuals must meet all of the registration criteria for KEEN Session Buddies above, and in addition:

6. Complete a DBS disclosure form and allow the DBS to inform KEEN of its findings
We will not allow any Session Buddy to undertake regulated activity in any circumstances without first submitting to and providing KEEN the results of an enhanced DBS check.

In addition, the registration request must be formally accepted by the Executive Director. A registration request may be declined by the Executive Director at their discretion, including (but not limited to) where one of the following reasons apply:

- The applicant is judged unable to provide safe, appropriate and consistent care for Participants or Participants.
- The Session Buddy does not undertake DBS checks or does not complete appropriate Safeguarding training
- The Session Buddy has a history of criminal activity, or there are reasonable grounds to believe that they have, as revealed by their DBS disclosure

Appealing an application or acceptance decision

The decision to decline an individual registration request may be appealed by a responsible adult on behalf of the applicant, or by the applicant themselves, via the **Comments and Complaints Procedure** set out in the **KEEN Compliments, Comments, and Complaints Policy**.

Guidance on admission to KEEN activities and age limits

Admission to Sessions

KEEN endeavours to allow as many participants to attend each session as is possible. KEEN Participants are requested to sign up for all KEEN Sessions in advance (this is necessary in the case of KEEN Plus or GrEAT Plus sessions). When this is the case, their place at the session(s) in question is guaranteed in advance, unless otherwise communicated by a member of KEEN Staff.

When KEEN Participants have not signed up for a KEEN Session, they remain welcome to attend (except in the case of KEEN Plus and GrEAT Plus sessions), however there may be cases in which allowing further attendees at a session would jeopardise our policy on Session Buddy to participant ratios. In these circumstances, if the participant in question has a responsible adult present, the KEEN supervisory staff will ask the responsible adult to support them at the Session. If this is not possible, admission to the session in question will be declined. This possibility will have been communicated to all participants in advance within the KEEN Participants Handbook.

Session age limits

We provide guidance on KEEN session age limits and have not set a policy around this as we understand that our Participants often develop differently to each other. This often makes their physical age inappropriate as a means of dictating which sessions they should attend.

Allsorts: Saturday afternoon activities and games session. Target age group: 4 to 25 (in two sessions with the first aimed at Participants usually up to 12). In the academic year (1st July to 31st June) that a Participant turns 26 they will in general no longer be able to attend Allsorts unless as a Session Buddy.

Zig-Zag: Thursday early evening drama, music and art session. Target age group: 4-13. Participants usually progress from Zig-Zag to KEEN Teens when they are ready but this is usually before they are 18.

KEEN Teens: Social Club for teenagers. Target age group: 11-21. There is no fixed age of transition from KEEN Teens to GrEAT. Participants aged 18 can opt to stay at KEEN Teens until the end of the academic year that they turn 21, or later at the discretion of the Programme Coordinator.

GrEAT Social: Over 18s Social Activities. Target age group: 18 upwards

GrEAT Sports: Over 18s multi-sports Activities. Target age group: 18 upwards

KEEN Plus: Target age group: no specific target. Dependent upon the activity and its purpose. Most KEEN Plus Activities will only be open to Participants aged 25 or under, unless it is a family event.

GrEAT Plus: Dependent upon the activity and its purpose. Most GrEAT Plus Activities will only be open to Participants aged 18 or over, unless it is a family event.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Volunteer Policy

This policy is intended to ensure good practice in the involvement of volunteers in KEEN's work, and promote understanding of the respective roles of staff and volunteers in the organisation. As a community led organisation, KEEN places great value on the involvement of volunteers in our work, including assisting with office and clerical tasks, support at KEEN Sessions, and decision making and policy development within committees.

Volunteers enhance the range and quality of services provided by KEEN by putting their time, skills, knowledge or experience at its disposal, and help keep KEEN's work relevant to the communities we work with by bringing a range of personalities, backgrounds and experience into the organisation.

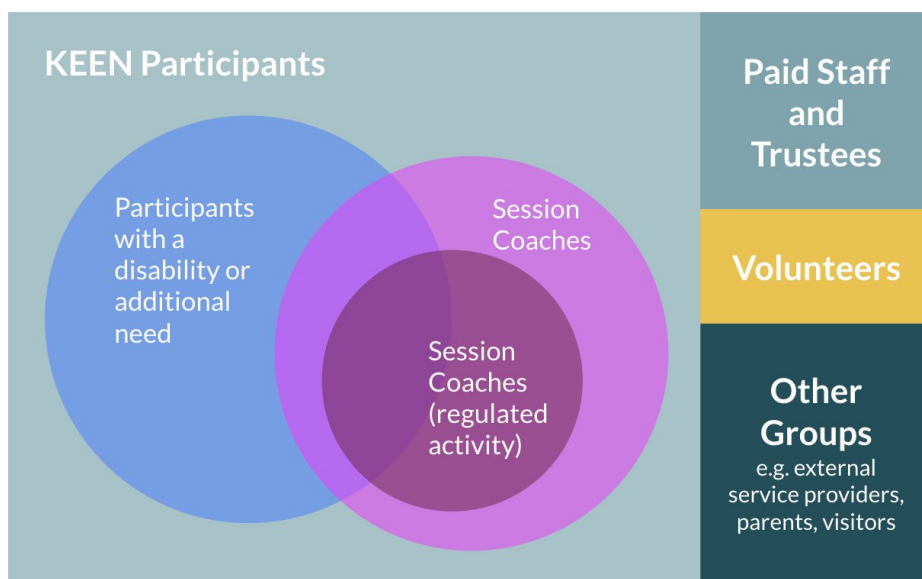


Fig.3: Venn diagram of the KEEN Community with KEEN Volunteers highlighted in yellow.

Equal Opportunities for Volunteers

KEEN relies on volunteer involvement to keep it relevant to the community it serves and so encourages involvement from all sections of the community.

KEEN operates an **Equality, Diversity, and Inclusion Policy**. It ensures that KEEN does not unfairly exclude or discourage the involvement of potential volunteers because of:

- class
- race, colour, nationality or ethnic background
- disability
- sex or marital status

- sexual orientation
- unrelated criminal record.

Each volunteer job specification should make clear the requirement that volunteers adhere to the **KEEN Equality, Diversity and Inclusion Policy**. If a volunteer has a special need or disability that makes their involvement difficult, every effort will be made to involve them. An explanation will be given if this is not possible.

Recruitment and Selection of KEEN Volunteers

The Executive Director and Programme Coordinator will be responsible for the selection of volunteers who would be working under their supervision respectively. Volunteers will be recruited from the widest possible base and selected accordingly to their own individual ability to perform the required tasks. A clear description (verbally and in writing) of the volunteer's role will be given. A volunteer will be invited to commence volunteering for a trial period prior to either side agreeing to a longer term arrangement. If unable to involve a particular volunteer, the staff member responsible for the selection must make the reasons clear in a sensitive manner.

Membership criteria for KEEN Volunteers

To register as a KEEN Volunteer, individuals must meet all of the following criteria:

1. To be aged 14 or over
2. To have completed an online or paper **KEEN Team Registration Form**
3. Read and agreed to abide by our **Team Code of Conduct**
4. Signed our **Team Declaration**

If an applicant is not able to carry out (2), (3), or (4) themselves, this can be completed by a responsible adult acting on their behalf.

In addition, the registration request must be formally accepted by the Executive Director. A registration request may be declined by the Executive Director at their discretion, including (but not limited to) where one of the following reasons apply:

- The applicant is judged unable to hold and carry out the role and responsibilities required, even once reasonable adjustments have been made for any additional needs that they might have.

Identification of KEEN Volunteers at KEEN Sessions

Volunteers involved with KEEN sessions will at all times wear a lanyard identifying themselves as such, distinguishing them from other groups in attendance including our participants, staff team, and any other groups. This lanyard will be provided by the Staff Supervisor or Session Coordinator prior to the start of the session, and collected back in at the end. The attendance of volunteers at KEEN sessions will be recorded in the attendance register.

Role and responsibilities of KEEN Volunteers

Before recruiting volunteers, the Executive Director will have considered the appropriateness of the role envisaged bearing in mind the following points:

- The roles of volunteers and those of staff in KEEN should be distinct. Staff should not be involved in working for KEEN in a voluntary and a salaried capacity.
- Work carried out by volunteers should not be such that might jeopardise paid posts.
- The voluntary role must allow for job satisfaction on the part of the volunteer, as well as meeting a need.
- Existing staff and volunteers should be consulted on the creation of new roles for volunteers which are likely to affect them and, if appropriate, a relevant Trade Union should be consulted.
- When a role for volunteers is identified and approved a role description outlining the general tasks, required skills or qualities, and conditions of service (i.e. expenses, insurance) should be available in writing.

Induction and training

All volunteers will be given an induction to KEEN and its work, including an information pack. Any training required to enable volunteers to fulfill their roles will be arranged and paid for by KEEN.

Support for KEEN Volunteers

An individual member of staff should be nominated to provide support to individual volunteers. Clear lines of communication should be identified. Staff need to devote time to support volunteers, and if necessary be provided with training in relevant skills. Where appropriate, additional methods of support will be used e.g. volunteer meetings, newsletters, or other tokens of appreciation. Note should be taken of individual volunteers needs for support.

Role in decision making

Volunteers will be encouraged to express their opinions on the work of KEEN and to develop their role within KEEN. Volunteers may be invited to attend and to speak at committee meetings, or to give their views as part of consultations.

Conditions

Volunteers will not be asked to work in conditions considered unsuitable for paid staff, and will have the same provisions made regarding Health and Safety. Insurance arrangements will be made for volunteers to cover them whilst undertaking activities on behalf of KEEN.

Out of pocket expenses which may be reimbursed include travel to and from KEEN Sessions, if agreed by the Executive Director in advance. In such cases, reimbursement will be at the sole discretion of the Executive Director, and in all cases only with proof of expense. Guidelines on acceptable expenses and rates will be available from the Executive Director.

Where the volunteering activity is carried out over a meal time, a subsistence allowance may be paid or a meal provided. Refreshments etc. will be freely available to volunteers as for paid staff.

If a grievance arises for a volunteer which cannot satisfactorily be resolved by their supervisor, it should be brought to attention via the procedures set out in the KEEN Compliments, Comments, and Complaints Policy. All volunteers should be made aware of the above rights and conditions without having to ask, and conditions such as rates for expenses, allowances, etc. will be reviewed periodically.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Staff and Trustee Policy

This Policy has been adopted in line with KEEN's goal of attracting, assessing and appointing the best candidates for roles (whether paid roles on our staff team, or on our board of trustees), to promote equality of opportunity, and to build a team capable of achieving our objectives.

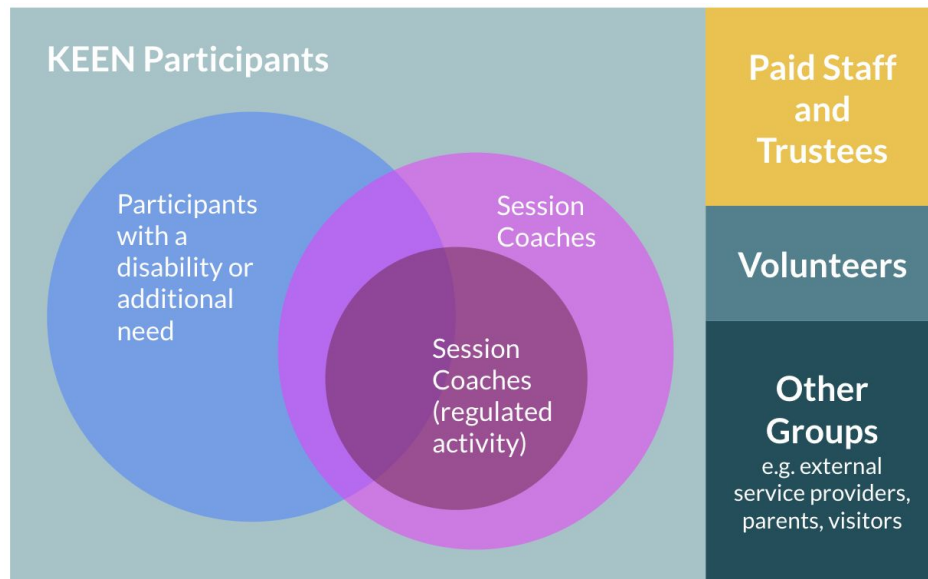


Fig.4: Venn diagram of the KEEN Community with KEEN Staff and Trustees highlighted in yellow.

Equal opportunities

KEEN seeks to encourage applications from all sections of the community, especially those which are under-represented in its workforce or on its board. All selection decisions will be based on skills, qualifications and experience. KEEN recognises that apart from job related qualifications and experience, other knowledge and experience may be equally valid in an appointment and are particularly relevant in the case of people from groups which experience discrimination. Person specifications and job descriptions will be carefully drawn up to ensure that criteria are relevant to the role, and that they do not discriminate on any grounds other than the ability to do that role.

Person specification

The person specification is a statement of the specific skills, knowledge, experience and attributes required to undertake the tasks involved in the role. It will be used as a basis for selecting candidates to be shortlisted and for decision-making during the interview itself by providing known, appropriate, justifiable and agreed criteria.

Role description

The role description sets out the responsibilities, accountabilities and scope of the job and itemises some of its main tasks.

Advertising the role

The advert will be designed and placed to attract as wide a group of suitable applicants as possible. Care will be taken to ensure the language used does not discriminate unintentionally.

The advert should reflect the main elements of the role description and person specification and should also include:

- The name of the organisation(s) role title
- Salary details (if for a paid post)
- Brief outline of duties and requirements
- Method of application
- Closing date, interview date (where appropriate)
- KEEN will also make provision for the role information to be available in accessible formats, if required.

Role information pack

The following documents will be available for role applicants:

- Covering letter, including date of interview and named person who can answer queries about the recruitment process
- Role description
- Person specification
- Summary of terms and conditions
- Background information relating to the post
- Application form
- Equality monitoring form
- Information about KEEN
- Guidance notes for the completion of the application form
- Access details for disabled people
- Details of whether applications will be acknowledged or not

Dealing with applications

All applications should be treated as confidential. All applicants will be kept informed of any significant changes to the recruitment schedule.

The monitoring form will be detached prior to the application forms being sent to the recruitment panel. Monitoring of applications received will allow KEEN to assess if a wide range of applicants have been reached and the success of the media used. It will also be useful to compare the number of completed applications received with the number of application packs requested as this may

indicate that an encouraging advertisement has not been backed up by an equally encouraging application pack.

Shortlisting

All applications received before the closing date will be considered. Members of the shortlisting panel are obliged to declare an interest to the Chair of the selection panel (normally the Chair of Trustees) if they do business with, are related to or are a close friend or partner of any of the applicants. The Chair of the selection panel will decide whether the panel member should withdraw or continue to be involved in the selection process.

An applicant's disability, irrespective of any need to adapt the building or facilities should they be successful, will not disqualify nor adversely affect the candidate's chances of being shortlisted or offered the post. This also applies where an existing employee has been newly disabled.

Each candidate's ability to meet the requirements of the role, as stated in the person specification, should be assessed using a simple scoring system. Candidates shortlisted for interview will be notified in good time and will be asked if they have any special requirements for interview.

The interview

The aim of the interview is to assess the applicant's suitability for the role in relation to the person specification. All candidates will be asked the same initial questions and allocated the same amount of time for their interview. Different supplementary or probing questions can be asked as appropriate depending on the response of the candidate to the initial question. Candidates may also be asked specifically about a matter arising from their application form, e.g. unexplained gaps.

Panel members must give the most careful consideration to their assessment of candidates. Each panel member is personally responsible for ensuring that they take adequate and legible notes of each candidate's interview.

All candidates will be asked about their commitment to equality and how they will ensure their work promotes this. Any test will be relevant to the role description and justifiable against the criteria in the person specification.

DBS checking and recruitment of ex-offenders

An enhanced DBS check will always be completed for all members of staff and trustees, with their employment conditional on undertaking one. KEEN complies fully with the Disclosure and Barring Service (DBS) Code of Practice (<https://www.gov.uk/government/publications/dbs-code-of-practice>).

Taking the decision

A simple scoring system should be used to establish how well each candidate meets the requirements of the role. The interview panel should total their assessments before any discussion/comparison of candidates is made.

Any shortlisting notes, interview notes and the monitoring form should be kept for 1 year as they may need to be referred to if the panel's decision is challenged. An industrial tribunal will request that all notes of all panel members are submitted to support any decision that was made.

As well as letting the unsuccessful, short-listed, candidates know that they have not been successful, consideration should be given to feedback their strengths and weaknesses as appropriate. The panel will aim to notify the successful candidate, usually by telephone, at the earliest opportunity.

References

Referees for the individual will normally be contacted in writing after the successful candidate has given their permission for KEEN to contact those people. Checks required by the Asylum and Immigration Act 2006 will be undertaken (information on the checks required can be found in the following location: <http://www.businesslink.gov.uk/bdotg/action/layer?topicId=1073981874>).

Background checks, induction and training

All staff must complete a DBS check and complete safeguarding training upon appointment. All staff will be given an induction to KEEN and its work, including an information pack. Any training required to enable staff to fulfill their roles will be arranged and paid for by KEEN. Staff should be encouraged to take additional training that will enhance their role within KEEN, to be paid for by KEEN.

Conditions for the recruitment of staff members and trustees

Appointment of staff members is conditional on them signing their contract, and agreeing to abide by the **KEEN Staff Code of Conduct** in **Appendix xx**.

Appointment of trustees is conditional on them agreeing to the **KEEN Trustee Code of Conduct** in **Appendix xx** and reading the **Good Governance Code**.

Identification of KEEN Staff and Trustees at KEEN Sessions

Staff and Trustees involved with KEEN sessions will at all times wear a badge identifying themselves as such, distinguishing them from other groups in attendance including our participants, volunteers, and any other groups.

Guidance on the recruitment of KEEN Trustees

It is recognised that a variety of skills are required in the running of KEEN, including the following:

- Experience in Human Resources / Education

- Law
- Fundraising
- Medical training
- Social Media / Marketing / Business
- Ex-participants
- Finance
- Governance
- Experience within KEEN

These qualities will be looked for in Trustee appointments. KEEN will also appoint, with the agreement of both the Chair of Trustees and Executive Director, Consultants / Leads who will work closely with the Board of Trustees to run projects. They will be chosen at the discretion of the Chair and the Executive Director.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a long horizontal flourish extending to the right.

Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN 'Other Groups' Policy

This Policy has been adopted to ensure clarity regarding the status of all other individuals who may be present at KEEN Activities, outside of KEEN Participants, KEEN Staff and Trustees, and KEEN Volunteers. These groups include (but are not limited to) the following:

- External service providers
- Parents, siblings, and other family members
- Carers and guardians
- Visitors to KEEN, for example partner organisations, funders, alumni, or other supporters

When individuals from these groups or similar ones are involved in KEEN activities it is important to have clarity on what responsibilities we have towards them. And, as a result of their presence what additional responsibilities we have towards other groups in attendance (most important among them our participants) in order to ensure a safe and secure environment.

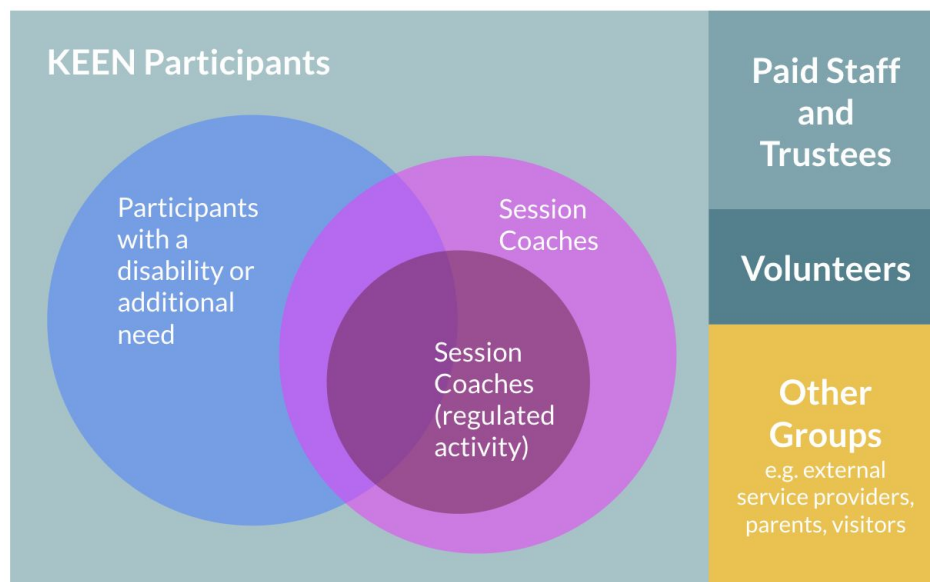


Fig.5: Venn diagram of the KEEN Community with KEEN Other Groups highlighted in yellow.

Identification of KEEN Other Groups at KEEN Sessions

Individuals from Other Groups involved with KEEN sessions will at all times wear a coloured name badge identifying themselves as such, distinguishing them from other groups in attendance including our participants, staff team, and volunteers. This name badge will be provided by the Staff Supervisor or Session Coordinator prior to the start of the session, and collected back in at the end. The attendance of individuals from Other Groups at KEEN sessions will be recorded in the attendance register.

It will be made clear to Session Buddies at all KEEN activities the distinction between themselves and Other Groups. In particular, it will be made clear that individuals from Other Groups are in no circumstances to take part in regulated activities, and that other distinguishing lines between Other Groups and our participants and volunteers are clear.

Conditions for Other Groups at KEEN Sessions

All individuals involved in KEEN sessions and not falling into KEEN Participants, KEEN Staff and Trustees, or KEEN Volunteers will be asked to agree to the KEEN Code of Conduct for Other Groups, and to sign our KEEN Declaration for Other Groups.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a long horizontal flourish extending to the right.

Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Health and Safety Policy

KEEN has adopted this policy in line with our commitment to provide and maintain a healthy and safe environment for anyone included within or who may be affected by its activities.

The day to day responsibility for ensuring implementation of this policy lies with the Executive Director, with this responsibility being delegated to the Programme Coordinator when they are the KEEN Staff Supervisor. The overall responsibility for the reviewing of this policy lies with the KEEN Trustees. Policies to read in conjunction with this policy include the following:

- KEEN Safeguarding and Protection of Children and Vulnerable Adults Policy
- KEEN Participant Policy
- KEEN Behaviour Policy
- KEEN Medication Policy

General Statement of Policy, Duties, and Responsibilities

Policy Statement

KEEN recognises and accepts its health and safety duties for providing a safe and healthy environment (as far as is reasonably practicable) for all individuals within the KEEN Community (paid or otherwise) and other visitors to its activities under the Health and Safety at Work Act 1974, the Fire Precautions (Workplace) Regulations 1997, the Management of Health and Safety at Work Regulations 1999, other relevant legislation and common law duties of care.

Throughout this Statement, terms such as “staff”, “workers”, “employees”, include both paid and volunteer workers.

It is the policy of KEEN to promote the health and safety of everyone within its community, and with that intent to:

- Take all reasonably practicable steps to safeguard the health, safety and welfare of all individuals at our activities
- Provide adequate working conditions with proper facilities to safeguard the health and safety of all individuals and to ensure that any roles undertaken produce no unnecessary risk to health or safety
- Encourage individuals at our activities to cooperate with KEEN in all safety matters, in the identification of hazards which may exist and in the reporting of any conditions which may appear dangerous or unsatisfactory
- Ensure the provision and maintenance of equipment and systems of work that are safe
- Maintain safe arrangements for the use, handling, storage and transport of articles and substances
- Provide sufficient information, instruction, training and supervision to enable everyone to avoid hazards and contribute to their own safety and health

- Provide specific information, instruction, training and supervision to KEEN's Health and Safety Officer, which is a role held either by the Executive Director or a trustee
- Make, as reasonably practicable, safe arrangements for protection against any risk to health and safety of the general public or other persons that may arise for KEEN' activities
- Make suitable and sufficient assessment of the risks to the health and safety of employees and of persons not in the employment of KEEN arising out of or in connection with KEEN's activities;
- Make specific assessment of risks in respect of new or expectant mothers and young people under the age of eighteen;
- Provide information to other employers of any risks to which those employer's workers on KEEN's premises may be exposed.

This policy statement and/or the procedures for its implementation may be altered at any time by the board of trustees. The statement and the procedures are to be reviewed each year by the board of trustees. A report on the review, with any other proposals for amendment to the statement of procedures, is to be made to the next following meeting of the board of trustees.

Statutory Duty of KEEN

KEEN will comply with its duty to ensure, as far as is reasonably practicable, the health, safety and welfare at work of its workers and of visitors to its premises and, in general, to:

- Make workplaces safe and without risks to health
- Ensure plant and machinery are safe and that safe systems of work are set and followed
- Ensure articles and substances are moved, stored and used safely
- Give volunteers/staff the information, instruction, training and supervision necessary for their health and safety

In particular, KEEN will:

- Assess the risks to health and safety of its volunteers/workers
- Make arrangements for implementing the health and safety measures identified as necessary by this assessment
- Record the significant findings of the risk assessment and the arrangements for health and safety measures
- Draw up a health and safety policy statement; including the health and safety organisation and arrangements in force, and bring it to the attention of its workers
- Appoint someone competent to assist with health and safety responsibilities
- Set up emergency procedures
- Provide adequate First Aid facilities
- Make sure that the workplace satisfies health, safety and welfare requirements, eg for ventilation, temperature, lighting and for sanitary, washing and rest facilities
- Make sure that work equipment is suitable for its intended use as far as health and safety is concerned, and that it is properly maintained and used
- Prevent or adequately control exposure to substances that may damage health

- Take precautions against danger from flammable or explosive hazards, electrical equipment, noise or radiation
- Avoid hazardous manual handling operations and, where they cannot be avoided, reduce the risk of injury
- Provide health surveillance as appropriate
- Provide free any protective clothing or equipment, where risks are not adequately controlled by other means
- Ensure that appropriate safety signs are provided and maintained
- Report certain injuries, diseases and dangerous occurrences to the appropriate health and safety enforcing authority

Statutory Duty of KEEN's Workers

Employees also have legal duties, and KEEN confidently requests non-employed (voluntary) workers also to observe these. They include the following:

- To take reasonable care for their own health and safety, and that of other persons who may be affected by what they do or do not do
- To cooperate with KEEN on health and safety
- To use work items provided by KEEN correctly, including personal protective equipment, in accordance with training or instructions
- Not to interfere with or misuse anything provided for health, safety and welfare purposes
- To report at the earliest opportunity injuries, accidents or dangerous occurrences at work, including those involving the public and participants in activities organised by KEEN
- Health and Safety law applies not only to employees in the workplace, it also applies to **organisations and people who occupy or use community buildings** to which members of the public have access.

Policy for KEEN Other Groups

On arrival all individuals within this category should be directed to the duty representative of the Health and Safety Officer who is normally the Staff Supervisor in charge. This person is to take responsibility for the visitor(s) and assist in their evacuation from the building during an emergency or arrange help in the event of an accident.

On arrival, these individuals, including contractors and/or their workers, must sign a record of the date and time of their arrival and, before leaving, should further record their time of departure.

Contractors working in the building should report any concerns relating to their own safety or suspected unsafe working practices to the Health and Safety Officer who will investigate and report to KEEN.

Organisation of Health and Safety: General principles

Health and Safety Sub-Committee

The board of trustees will appoint a Health and Safety Sub-committee, including representation both of themselves and of staff (both paid and volunteer):

- To have a broad overview of Health and Safety matters
- To keep KEEN's Health and Safety policy and procedures under review
- To conduct safety tours of all premises
- To ensure that risk assessments are carried out, including assessments regarding substances hazardous to health (COSHH Regulations)
- To take such action as may be required to ensure that KEEN's responsibilities for Health and Safety are fulfilled
- To report to the board of trustees on their performance of these responsibilities

Contractors working in the building should report any concerns relating to their own safety or suspected unsafe working practices to the Health and Safety Officer who will investigate and report to KEEN.

Safety tours

The Health and Safety Committee shall carry out 6-monthly tours and inspections of all premises KEEN uses and make a report to the next ordinary meeting of the board of Trustees. All necessary actions as a result of the tour shall, where reasonable and practicable, be implemented. The tour shall include inspection of the Accident File.

Health and safety rules

All individuals must exercise ordinary care to avoid accidents in their activities and comply with the following general rules and with any further rules which KEEN may publish from time to time.

Accident forms and file

The file must be kept in a secure location. Any injury suffered by an individual in the course of employment or otherwise at KEEN's premises or activities, however slight, must be recorded, together with such other particulars as are required by statutory regulations, on an accident form maintained by KEEN.

Fire precautions

All personnel must familiarise themselves with fire escape routes and procedures and follow the directions of KEEN in relation to fire.

Equipment and appliances

No equipment or appliance may be used other than as provided by or specifically authorised by or on behalf of KEEN, and any directions for the use of such must be followed precisely.

Food hygiene

When handling or preparing food there are specific hygiene requirements:

- Regularly wash hands before and during food preparation and especially after using the lavatory
- Tell your supervisor or representative of the Committee of any skin, nose, throat, or bowel problem
- Ensure cuts or sores are covered with correct waterproof dressings
- Keep yourself clean and wear clean clothing
- Remember that smoking in a food room is illegal
- Never cough or sneeze over food
- Clean as you go. Keep all equipment and surfaces clean
- Prepare raw and cooked food in separate areas. Keep perishable food covered and either refrigerated (less than 8°C) or piping hot (above 63°C)
- Ensure waste food is disposed of properly. Keep the lid on rubbish bin and wash your hands after putting waste in it
- Avoid handling food as far as possible
- Tell your supervisor or representative of the Committee of any defects or concerns regarding the facilities – eg uncleanness, refrigeration malfunction, cracked food preparation surfaces

Display screen equipment

KEEN recognises its responsibility to ensure the well-being of workers who habitually use display screen equipment for a significant part of their normal work. Volunteers/Workers are advised to ensure that they take a five minute break from the display screen equipment at least once an hour and are advised that, if they experience vision defects or other discomfort that they believe may be wholly or in part a consequence of their use of such equipment, they have the right to an eye-test at KEEN's expense.

Alcohol, drugs, and tobacco

Smoking within the premises and the use of Drugs (except under medical supervision) on the premises are prohibited at all times. The use of intoxicants (alcohol) is prohibited during working hours, and no employee/volunteer may undertake his/her duties if under the influence of alcohol or drugs (except under medical supervision)

Organisation of Health and Safety at KEEN Sessions

Key Health and Safety Officers at KEEN Activities and KEEN Sessions

Every KEEN Activity, and more specifically every KEEN Session, will have in attendance at least the following:

- a KEEN Staff Supervisor (member of Staff or Trustees in charge)
- an individual with current first aid training
- a Safeguarding Officer

Current first aid training means having a currently valid certificate from a one day (or higher) First Aid course. **Safeguarding officer** means an individual with required training as set out in the KEEN Safeguarding and Protection of Children and Vulnerable Adults Policy.

Where practicable, at **KEEN Sessions** there should be at least one other person with current first aid training present.

Risk assessments for all activities

Before the start of every session, the KEEN Staff Supervisor will have undertaken a risk assessment to identify hazards (the potential for harm), assess risks (the likelihood of that harm being realised) and take reasonable steps to mitigate these risks. These risk assessments will be read by all staff, and updated at regular intervals as set out within the risk assessment template. If required, the Staff Supervisor will seek consent and indemnity from all participants in respect of the risks.

After every session, the Staff Supervisor will decide based on the applicable risk assessment risk matrix (see Appendix) whether any changes to the risk assessment are required, taking into account any near misses, incidents or other aspects of the session that in his/her judgment are relevant.

First aid provision and supplies

At least one first aid kit should be brought to each session. Where the session involves separating Participants or Participants into smaller groups, there should be one first aid kit per group. Where practicable, there should be one person qualified in first aid per group. All individuals involved in the session should be informed of whom they can go to if there is an accident.

Follow recommended adult to child ratios for working with children

(Based on NSPCC guidance (2018). See original source here:

<https://learning.nspcc.org.uk/research-resources/briefings/recommended-adult-child-ratios-working-with-children/#heading-top>)

At least two adults will always be present when working with or supervising children and young people at KEEN activities, and the following adult to child ratios will be followed at all times:

4 - 8 years - one adult to six children

9 - 12 years - one adult to eight children

13 - 18 years - one adult to ten children

When Session Buddies under the age of 18 are helping to supervise children under the age of 16, only people aged 18 or over will be included as adults when calculating adult to child ratios.

Toilet ratios

If a group of participants includes both boys and girls there will be at least one male and one female Session Buddy supervising visits to the toilet. In larger groups of participants, for example on day trips, groups will be encouraged to take comfort breaks together, to reduce potential strain on the adults to children ratio.

Adequate training provided to KEEN staff and volunteers

Session Buddies will be given Health & Safety training during induction. The Supervisory Staff will ensure that the demands of activities do not exceed the capabilities of Session Buddies to carry out KEEN activities without risk to themselves or others.

Health and Safety briefings

The Supervisory Staff Member present on site will ensure that all participants of the Activity or Session are adequately informed of the identified risks and where appropriate receive instruction, training and supervision before commencing the session. The Supervisory Staff Member will also ensure that all participants are aware of the incident/accident procedure and who they can go to in the event of an incident/accident.

Health and Safety requirements of individual participants

The Supervisory Staff will have consulted and informed both Session Buddies and the parents/carers of Participants and Participants on relevant health and safety matters, both before their first session and at appropriate periodic intervals.

Manual handling

This guidance recognises that manual handling of Participants and Participants may be necessary for toileting and personal care. It may also be necessary in emergency situations if it will prevent accident or injury. Where this is the case, a risk assessment will have been carried out.

The KEEN supervisory staff must ensure that:

- Team Members and session leaders are aware of the relevant parts of this guidance
- KEEN has adequate records of the safe manual handling procedures for Participants and Participants who require lifting for toileting or personal care
- If manual handling of a Participant is necessary during a session, that the Team Members who will carry out the manual handling are physically able to carry out the safe manual handling procedures for that Participant and have any training or equipment that may be necessary.
- Parents and carers are given the opportunity to carry out the manual handling of their own Participants or Participants (or provide a qualified carer to do so) at their own risk if they wish.

There are now strict guidelines covering all forms of physical contact with young and vulnerable people that are designed to safeguard the individual, and this is dealt with separately in our KEEN Safeguarding and Protection of Children and Vulnerable Adults Policy.

Identifying and reporting incidents and accidents

Incidents, accidents and near-miss cases are to be reported in accordance with the procedures outlined within these policies.

Periodic review of the health and safety policies undertaken

The Supervisory Staff will undertake a review of health and safety policies every 12 months, taking into consideration any relevant developments in regulations and legislation, as well as any incidents, accidents and near-miss cases that have occurred in the period before the review.

Arrangements and Procedures

The Health and Safety Officer, nominated by the board of trustees, is responsible for ensuring that the safety policy is carried out and that responsibilities for safety, health and welfare are properly assigned and accepted at all levels. His/her details and a contact number will be displayed on the KEEN website and in addition within key communications with all members of the KEEN Community at least twice a year.

First Aid and Accident Reporting

The current First Aider(s) for the premises is/are communicated to all individuals involved in KEEN's activities prior to their start. First Aid kits are provided in the following location(s): (1) the KEEN office, and (2) at all KEEN activities and hired venues.

Incident and accident procedure

- 1) If a Participant is lost, move immediately to the Lost Participant procedure
- 2) In the event of an injury or illness, call for a member of staff or ring for an ambulance directly. To call an ambulance – dial 999 and ask for “ambulance”
- 3) All accidents must be reported to the Health and Safety Officer or another member of staff on duty immediately or as soon as practicable;
- 4) The KEEN supervisory staff will ask for witnesses to the incident and ascertain exactly what happened.
- 5) All accidents must be entered on an accident form, available from the Staff Supervisor. The procedures for “notifiable” accidents as shown in Appendix B must be followed;
- 6) Parents/carers are contacted and informed of the incident by the KEEN supervisory staff. A copy of the incident form should be made available to them.
- 7) A copy of the incident form must be made available to the trustees who will review the incident in relation to the appropriate risk assessment with a view of future prevention.

The Executive Director and Programme Coordinator will convene at the earliest instance to review the circumstances of the incident and determine the follow-up action to be taken (if any), including any steps to prevent a similar incident from occurring. The Supervisory Staff Member will convey the changes in procedures and policies to the parents or legal guardians of those involved.

Lost Participant procedure

It is essential that every Participant attending a KEEN session has an identifiable person who has responsibility for them during a session. This is usually the Session Buddy who has been paired up with the Participant but may also be a parent/carer who has chosen to stay for the session, or the KEEN supervisory staff (in the case of GrEAT sessions, explained...).

When a Participant is found to be missing this must be reported immediately to the KEEN supervisory staff by the responsible person. The KEEN supervisory staff will assess the situation by:

- Asking the responsible person about where and when the Participant was last seen
- Checking entrances and exits to the site to ascertain which ones are unlocked
- Asking KEEN Team Members and other users of the site whether they have seen the Participant in question. It may be particularly helpful to ask the staff of the site about this.

If the KEEN supervisory staff is reasonably certain that the Participant is still on site they should:

- Identify a small group of Team Members/parents/carers to search the site ensuring that no Participant is left unattended
- Agree a time and place for all searchers to report back

If the KEEN supervisory staff is not reasonably certain that the Participant is still on site they should:

- Immediately contact the police and request support
- Contact the parent/carer of the Participant to inform them of the situation
- Organise a search of the local area using the same method as described above.

Irrespective of the outcome an incident form must be completed after the event by the responsible person and this should be made available to the trustees so that the incident can be properly reviewed.

Fire, bomb, and equipment or materials procedures

In the event of fire

- Persons discovering a fire should sound the nearest alarm
- The first duty of all workers is to evacuate all people from the building by the nearest exit immediately the fire is discovered
- All persons must evacuate the building and, where possible without personal risk, leave all doors and windows closed
- The assembly point for the building is at the [locations for session venues communicated to all individuals involved]
- No-one should leave the assembly point without the permission of a member of staff;
- If **any** fire occurs, **however minor**, the Fire Brigade must be called immediately by dialling 999 and asking for "Fire";
- When the Fire Brigade arrives advise whether all persons are accounted for and location of fire.

Bomb warnings

- If you receive a warning try to find out from the caller:
 - The approximate location of the bomb and likely time of detonation;
 - Whether the police and fire brigade have been notified;
 - Try to RECORD EXACTLY WHAT IS SAID:
- Notify the Police immediately on 999;
- DO NOT SOUND THE FIRE ALARM but evacuate the building taking into consideration any information from the bomb warning;
- Assemble in the [locations for session venues communicated to all individuals involved] unless the bomb warning implies otherwise.

Cleaning materials, general machinery, and high risk areas

- All portable machinery must be switched off and unplugged when not in use;

- Wandering cables are a hazard; use with caution and safety in mind;
- Slippery floors and dangerous; use warning signs;
- Use protective clothing and equipment provided and as instructed on machinery/equipment/material. It is the duty of a worker to report any loss of or defect in protective clothing or equipment.

Procedure for absence of a staff member

Where no staff member is able to attend the session, the plan below will be put into place to run the session (the “**Temporary Plan**”).

Temporary plan

The staff member in question will inform the Chair of Trustees of his/her likely period of absence at the earliest instance and agree with the Chair of Trustees on the period for which the Temporary Plan will be in force (the “**Defined Period**”). A trustee will be delegated by the Chair of Trustees to take on the supervisory role for the session and ensure the following requirements for running the session (the “**Conditions**”) are met:

- 1) There is at least one first-aider with current first aid training present on site, different to the trustee in the Staff Supervisor role, and;
- 2) There is at least one Safeguarding Officer present on site.

The Chair of Trustees will seek to ensure that the Conditions can be met for the Defined Period. If this is not possible then the Chair of Trustees will convene a meeting of the trustees at the earliest opportunity to determine alternate steps to be taken at their complete discretion.

Procedure for cancelling a session

Whether because no member of KEEN supervisory staff is available to oversee a KEEN Session, the conditions of the Temporary Plan cannot be met, or for some other reason, it may be necessary to cancel a KEEN Session. A decision to cancel a KEEN Session will remain the sole discretion of the Executive Director, or, in their absence, the Chair of Trustees.

If a session is cancelled, the following procedure will be followed:

- 1. Collect the office keys and then go to the KEEN office to see full details of the procedure of how to cancel a session**
- 2. Cancel any transport**
 - *ALLSORTS: If Michaelmas (Oct-Dec) or Hilary (Jan-March) volunteers transport will also need to be cancelled*
 - If Charlton’s Coaches: If being cancelled on a Saturday morning there may not be anyone in the office, in which case someone will need to go to St. Giles, where the bus picks up to let

them know. The bus arrives anytime between 12.40pm and 1pm and stops close to the Taylorian Institute, where other coaches pick-up.

3. Email team members, to let them know that the session is cancelled

Website: Put a post on the News section of the website saying that the session is cancelled.

4. Email participants, to let them know that the session is cancelled

5. Answering machine message and website

- Change the outgoing message on the answering machine. Follow the instructions to change your personal options, and then follow the instructions to record and set a new personal message explaining that the session is cancelled.

6. Go to the session

Someone will need to be at the venue of the session that's being cancelled as parents will be bringing their athletes (and some volunteers will inevitably turn up). It would be impossible to let all the parents know that the session has been cancelled as apart from those coming on the minibus athletes do not usually sign-up beforehand. (KEEN+ activities are an exception to this but the Staff Supervisor should have prepared a list of athletes that are attending so all parents will be contactable). There will need to be someone at the session at least 15 minutes before the start of the session.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Safeguarding and Protection of Children and Vulnerable Adults Policy

KEEN works with children, vulnerable adults, and families as part of its activities. These activities include sessions in which these groups participate. At these sessions, both children and adults are sometimes under our sole care.

KEEN has adopted this policy to protect the children and adults who receive KEEN's services, and to provide parents, staff and volunteers with the overarching principles that guide our approach to the protection of children and vulnerable adults. We believe that no one should ever experience abuse of any kind, and that we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

Our Policy

This policy statement applies to anyone working on behalf of KEEN, including but not limited to, our paid staff and the board of trustees, external service providers, volunteers, sessional workers, and students.

Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and vulnerable people in England, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Every Child Matters 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote welfare of children, 2006.
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Special educational needs and disability (SEND) code of practice: 0 to 25 years - Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015

- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015

We recognise that

- the welfare of the child is paramount, as enshrined in the Children Act 1989
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

Our core principles

We aim to keep children and vulnerable adults safe by:

- valuing, listening to and respecting them
- taking account of the wishes and opinions of the children and young adults, and help them to express these within the level of their present understanding. To accommodate alternative means of communication (these may include speech, signing, visual cues or technological aids and augmented communication as in Facilitated Communications).
- appointing a Designated Safeguarding Officer (DSO), a deputy child protection/safeguarding lead and a lead trustee/board member for safeguarding
- adopting child protection and safeguarding practices through policies, procedures and a code of conduct for staff and participants and external support providers which reflect best practice
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- developing and implementing an effective online safety policy and related procedures
- sharing information about child protection and safeguarding best practice with children, their families, staff and volunteers via leaflets, posters, group work and one-to-one discussions
- To instigate and foster a partnership with parents and carers to encourage consistency and continuity in education, care and management.
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- implementing a code of conduct for all groups that work with or participate at KEEN.
- using our procedures to manage any allegations against staff and volunteers appropriately
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance

- recording and storing information professionally and securely.
- All Staff and Session Buddies should be familiar with what child abuse is, and have to hand information on its common indicators.
- All Staff and Session Buddies should be aware of the additional vulnerability of children who have disabilities.
- All Staff and Session Buddies should have adequate induction and training to enable them to acquire essential knowledge.
- All Staff and Session Buddies should know what to do when they have concerns about a child's welfare.
- All Staff and Session Buddies should be aware of KEEN's values, principles, code of behaviour/conduct, and this child protection policy and its procedures.

Recruitment of employees and volunteers

KEEN recognises that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children.

- All workers and volunteers who have unsupervised access to children and young people are subject to criminal record checks through the Disclosure and Barring Service (a DBS check).
- All Session Buddies, Volunteers, Employees, or otherwise must have a valid Enhanced DBS disclosure to undertake alone or supervise regulated activities.
- All Session Buddies, Volunteers, Employees must complete an application form, which will (among other things) elicit information about an applicant's past.
- Before starting employment, in addition to DBS checking, prior to starting employment, applicants for staff positions are asked to attend a face to face interview, provide two suitable references, verification of their identity, verification of any qualifications deemed necessary to their post and verification (if necessary) of their right to work in the UK.
- Volunteers and Session Buddies are asked to supply one referee (for students, this may include employees at their university) and verification of their identity.
- All discussion of the applicant's details will be made with the applicant's permission, and will be limited to those whose duties require them to know.

The information above is supplemental to information elsewhere in these policies. See also our Participant Policy, Staff and Trustee Policy, and Volunteer Policy.

Other Groups including external service providers

All external service providers and other visitors at KEEN activities are required to sign our Code of Conduct for Other Groups, and make themselves clearly identifiable as such to all other staff, volunteers and other external groups.

All Other Groups, whether or not defined explicitly below, all need to follow the following basic requirements:

- 1) Wear an official KEEN lanyard provided by a staff member identifying them as such
- 2) Have provided their details to KEEN using our 'Other Groups' registration form
- 3) Agreed to our Code of Conduct for Other Groups.

The information above is supplemental to information elsewhere in these policies. See also our Participant Policy, Staff and Trustee Policy, and Volunteer Policy.

Safeguarding and Protection Training for Staff and Volunteers

After recruitment, all new volunteers and employees are required to pass an online Safeguarding course provided by OSCB, and complete a member of staff supervised induction including an understanding of:

- Basic health and safety procedures
- Reinforcement and reminder of the four types of child abuse and how to report concerns
- How to respond to disclosures of abuse

In addition, regular training opportunities are offered which help employees and volunteers to work safely and effectively with children. The Designated Safeguarding Officer (DSO) must also receive training involving how to make referrals, maintaining policy and ensuring all other employees are aware of protocols.

The information above is supplemental to information elsewhere in these policies. See also our Participant Policy, Staff and Trustee Policy, and Volunteer Policy.

Providing Personal and Intimate Care

Consultation with the responsible adult of a young person or vulnerable adult also takes place regarding the supervision of each child's personal care, to understand what personal care is and is not permissible for us to carry out.

- The children have a right to privacy and dignity. This applies to the use of the toilet and changing rooms and supervision should always take this into account. Whilst help may be needed with washing, this should not include touching the child - particularly his/her private parts.
- Care should be taken by Session Buddies who could unwittingly place themselves in vulnerable situations by being alone with the child in inappropriate situations: avoid this by never being alone with a child.
- Children should be treated in an age-appropriate manner. For example as far as is possible to use the gender appropriate toilets or changing rooms.
- Children should be taught strategies to engender a sense of dignity and self-respect. For example: to close the toilet door, modesty/cover the body appropriately.
- The child has a right to express what he/she thinks and feels and to volunteer an opinion regarding the supervision of his/her self-care. This may relate to the age of the child and gender of the Buddy.

Physical handling of KEEN Participants

In the course of KEEN sessions it is inevitable that physical contact will occur between our Session Buddies and our participants. Indeed, some of our participants require physical contact between themselves and the Session Buddy in order for them to fully participate in and enjoy the session.

This guidance sets out our approach for managing this situation and defines boundaries within which KEEN will operate. As part of this approach, we will ask the Participant's responsible adult for information about their individual's needs, and existing management plans of any type that is relevant and put in place by other agencies or organisations. It is our intention to work within these existing plans and not to develop ones of our own.

The rules within which we will work are:

1. We will implement and work within current safeguarding good practice. All Team Members are asked to undergo safeguarding training. Those who have not will be supervised at all times by a trained Session Buddy and will never be left alone with a Participant.
2. We will ask all of our Team Members to subject themselves to a DBS check. Those new Team Members who have not yet been checked will be supervised by a Session Buddy who has been checked at all times and will never be left alone with a Participant.
3. As described previously, after taking guidance from a Participant's parent, carer or legal deputy we will work within any care or management plan developed for a given individual by another agency or organisation. This is on the understanding that the whole plan is made available to us and that any specific training needs are identified and undertaken before it is implemented.
4. We will at all times use minimal physical intervention and will use current best practice. KEEN trustees will seek to provide or secure any specific training identified as necessary by our Session Buddies, KEEN supervisory staff or trustees.
5. Any form of violence (physical, verbal or emotional) towards a Participant by a Session Buddy will be taken seriously and will normally be reported to the police after consultation with parents, carer or legal deputy (as appropriate) and trustees.
6. We recognise that KEEN has a duty of care to all individuals within the KEEN Community as well as its Participants. Our approach is to put in place the best possible management plan for Participants, to give Session Buddies adequate training and to assess risk of behavioural issues regularly.
7. We will review our approach annually and after any major incident that has involved physical handling issues of any kind.

Preserving a safe environment

Our policy is to ensure that a safe and suitable environment is provided at all times. All equipment and areas used must be safe and suitable for KEEN activities. Risk assessments are carried out for every venue used and **a trained First Aider is present at every activity session**. The Health and Safety policy covers the procedures followed to maintain these standards.

Contact details

Designated Safeguarding Officer (DSO)

Name: Rupert da Silva

Phone: 07806 743 595

Email: rupert@keenoxford.org

Deputy child protection lead

Name(s): Rowan Green

Phone: 07806 743 595

Email: keen@keenoxford.org

Senior lead for safeguarding and child protection

Name: Jim McMahon

Phone: 07583 444 409

Email: chairoftrustees@keenoxford.org

CEOP

www.ceop.police.uk

Procedures

Responding to signs of abuse that fall short of direct disclosure

Concerns may arise through observations or through information from others. Those aspects that may give cause for concern may include:

- Unusual behaviour, or changes in the behaviour of the child
 - Unexplained or recurring health problems
 - Anxieties expressed or inferred by carers over the child's welfare
 - Changes in personal relationships with peers or adults
1. Buddy or Volunteer observes physical or behavioural signs of abuse and forms a suspicion
 2. Keep accurate records, including times, dates and detailed description of observed signs.
Use form in Appendix 1
 3. Refer to Designated Safeguarding Officer (DSO) concerns along with recorded information.
 4. DSO, with consultation of trustees, then decides whether to refer social services or police.
Record referrals using form in Appendix 2

It is important to remember that the majority of children at KEEN have special needs, and so may be more vulnerable to abuse than other groups of children. It is crucial we make careful observations of any physical or behavioural signs or symptoms.

Responding to a direct disclosure of abuse

1. Child (or other individual) discloses to Buddy or Volunteer information about incident(s) of abuse against themselves /another child
2. Keep accurate records, including times, dates and detailed description of observed signs / disclosures made. Use form in Appendix 1 to record
3. Refer to Designated Safeguarding Officer (DSO) concerns along with recorded information.
4. DSO, with consultation of trustees, then decides whether to refer social services or police. Use form in Appendix 2 to record referrals.
5. DSO informs parent/carer unless there are concerns this may compromise the child's safety.

A telephone referral to the police or social services must be confirmed in writing, within 24 hours if at all possible (and in all cases within one week), and the name of the contact who took the referral should be recorded.

Responding to allegations of abuse against someone not working for KEEN

This may be a parent or carer, another child, professional or another person.

1. Allegation or Concern is made against someone not working in the group
2. Keep accurate records, including times, dates and detailed description of observed signs
3. Refer to Designated Safeguarding Officer (DSO) concerns along with recorded information (see KEEN website for DSO contact info)
4. DSO, with consultation of trustees, then decides whether to refer social services or police.

A telephone referral to the police or social services must be confirmed in writing, within 24 hours if at all possible, and the name of the contact who took the referral should be recorded.

Responding to allegations of abuse against someone working for KEEN

KEEN is committed to the highest standards of quality, honesty, openness and accountability and to fostering an environment in which employees and volunteers feel free to raise concerns in a reasonable and responsible way, without fear of victimisation.

Employees and volunteers have a duty to report concerns about another employee or a volunteer. If you raise a genuine concern under this policy, you will not be at risk of suffering any form of retribution or harassment as a result. Providing you are acting in good faith, it does not matter if you are mistaken. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. You should report any concerns to the Child Protection Liaison Officer, or if the concern surrounds this individual, you should contact a KEEN trustee (details can be found on the KEEN website). Once you have told us of your concern, we will investigate it carefully and thoroughly to assess what action, if any, should be taken. Depending on the nature of your concern, this may mean an internal inquiry or a more formal investigation by the Social Services. If you have a personal interest in the matter we ask that you tell us at the outset. If there is any uncertainty about how to proceed with such a situation, immediate advice from Social Services or KEEN should be sought.

Points of procedure when responding to direct disclosure or allegations of abuse

- The child's welfare and safety must have first priority.
- To delay reporting a suspicion of significant harm could be very serious - time is therefore crucial. Accept what a child tells you but do not ask him/her for further information as interviews are conducted by specially trained people. In particular, do not ask suggestive or leading questions.
- Tell the child that they are right to tell you and reassure them that they are not to blame.
- Be aware that our children with special needs can have great difficulty communicating any information, let alone allegations of abuse.
- Do not make physical examinations.
- Keep accurate records and report your concerns to the Child Protection Liaison Officer. Do not discuss your suspicions with parents or anyone else.
- Child Protection is the responsibility of the entire KEEN community - no matter what position you hold it is important that you report any suspicions or disclosures.
- Any case of child abuse must be dealt with in accordance with the approved Guidelines and Procedures - no action should be taken beyond what is set out in them.
- Child abuse can happen to any child of any age in any place at any time.
- All Buddies are reminded of the duty to safeguard confidentiality. They also have a duty to cooperate fully with any enquiry which may be necessary.
- Make contact with the Child Protection Liaison employees – See the KEEN website for names and contact details.

Recording, storing, and using information

To ensure that this information is as helpful as possible, a detailed record must always be made at the time of the disclosure/concern, using the forms in **Appendix A**. Pay attention to the following in the report. Specify the nature of the allegation. Include dates, times, any special factors and other relevant information.

- Make a clear distinction between what is fact, opinion, or hearsay.
- Include any relevant background information known to the person making the report, and the source of that information – which may include previous concerns, other children in the family, history of domestic violence/abuse, adult mental problems, adult misuse of drugs/alcohol, or history of violence towards employees.
- Describe any visible bruising or other injuries. Also any indirect signs, such as behavioural changes.
- Include details of witnesses to the incidents.
- Write down the child's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Indicate whether the parents have been contacted, and if so, what has been said.
- Has anyone else been consulted (e.g. a professional or someone who knows the child)? If so, record details.
- If the child was not the person who reported the incident, has the child been spoken to? If so, what was said?
- Has anyone been alleged to be the abuser? Record details.

This information should be recorded by the Buddy/volunteer who has the concern. They are encouraged to seek the help of the Designated Safeguarding Officer (DSO) in order to make the recording as accurate as possible. However, not having all the information available (such as child's address) should not prevent the Buddy/ volunteer from reporting the concern immediately. Privacy and confidentiality will be respected as far as possible but if doing this leaves a child at risk of harm then the child's safety has to come first. Where information given by a child or parent cannot be kept confidential, this should be explained to the child/parent in a sensitive manner. Information will be stored confidentially in a lockable filing cabinet, or password-protected computer account, with access strictly controlled and limited to those who would need to know as part of their job. If you are worried about sharing concerns about abuse with a senior colleague, you can obtain advice from social services or the police direct, or KEEN Child Protection Helpline on 0808 800 5000, or Childline on 0800 1111, but the procedures in this document are still to be followed; if the concerns relate to a specific employee (or the DSO) then contact (a different) Trustee.

Procedure for a 'Child in Need' concern rather than a 'Child or Vulnerable Adult Protection' concern

Sometimes concerns about a child may not be about abuse. You may be concerned that a child or family require some help in making sure all the child's needs are met to address a particular problem. If there is a concern for child, which may not be about abuse, the same steps must be taken by Participants as in the instance suspecting abuse. The DSO can then decide whether the case is a Child Protection concern or a child in need. If it is the latter, the next step in the process is being referred for the Common Assessment Framework (CAF). This is a standardised approach to conducting assessments of children's additional needs and deciding how these should be met. The DSO should receive training in how to apply this process.

Guidance

Definitions of abuse

(From Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. HM Government, 2006)

What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a

parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

How to recognise the signs of abuse

(From Guidance on Child Protection Anne Schonveld CEDC, 2002)

These are lists of some of signs and behaviours which may indicate that a child is being abused. Such lists are not fail-safe mechanisms, but can be helpful indicators in certain combinations. In themselves they are not evidence of abuse, but they may suggest abuse if a child exhibits several of them or a pattern emerges. Remember that there can be other explanations for a child showing such signs or behaving in such ways. This is especially pertinent for children with special needs.

Possible signs of physical abuse

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable explanations for injuries
- Untreated injuries or illness not attended to
- Fear of going home or of a parent/carer being contacted
- Significant changes in behaviour with no explanation
- Signs of physical discomfort without explanation

Possible signs of emotional abuse

- Continual self-deprecation, low self-esteem
- Inappropriate emotional responses to new difficult or painful situations
- Drug, alcohol or solvent abuse
- Depression, withdrawal

Possible signs of sexual abuse

- Bruises, bites or marks on the body
- Scratches, abrasions or persistent infections in anal or genital areas
- Pregnancy – especially in young adolescents who are evasive about the identity of the father
- Age-inappropriate sexual awareness (may be evident in play, drawings, vocabulary, writing)
- Attempts to teach other children about sexual activity
- Pain when sitting down
- Odour

Possible signs of neglect

- Constant or frequent hunger
- Small stature or growth
- Inappropriate clothing (too large, too small, clothes for the opposite gender)
- Medical needs not met or treatment not sought

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a stylized, cursive script.

Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Behaviour Policy

KEEN has adopted this policy to help ensure that we can provide a positive and supportive environment for all participants, acknowledging that we work with young people and adults who present different behaviours, and that sometimes these can present challenges. We acknowledge the diversity and range of needs of our participants and that this can impact on specific behaviours.

We recognise that there are many underlying causes for behaviours and wherever possible, care must be taken by employees and Session Buddies to consider each situation individually and to take into account any underlying causes which may or may not affect the behaviour of our Participants and Participants.

Mitigating challenging behaviour

- Ensure that employees are trained in issues surrounding behaviour and behaviour management. This can be done through an online or in-person training course such as by 'Future Learn' or another continuing professional development qualifications.
- Ensure that Team Members are aware of the issues surrounding behaviour and behaviour management and are given opportunities to learn more about them.
- Ensure parents and carers are involved them in the development of mitigation strategies for their child.

Managing challenging behaviour

- Discuss openly incidents deemed sufficiently serious by our Session Buddies and employees with parents/carers. We will make a record of this discussion and consider how best to include the participant in question in future activities without a repetition of the incident.
- Inform parents/carers of any damage done by the participant they are caring for to property, whoever it is owned by. Parents/carers/participants will be expected to reimburse the cost of any damage done to equipment and/or property via bad behaviour.
- If any Participant has been involved in what KEEN considers to be a serious incident, KEEN has the right to refuse him/her admission to sessions, or discontinue the given Buddy pairing, until the underlying causes of the behaviour in question have been adequately addressed.

Guidance on alcohol consumption

KEEN understands that alcohol can bring specific health and safety concerns. The Staff Supervisor has complete discretion in how they handle alcohol related issues.

Whether a participant is permitted to drink alcohol will be noted on their profile cards, along with notes on any potential issues with alcohol and medication and where there is potential for alcohol to cause behaviour or mood change issues. We may actively discourage participants from buying and consuming alcohol based on these notes.

In cases where participants disregard our advice we reserve the right not to include that participant in any KEEN event where alcohol is available. In the case where a Participant brings alcohol to a session by way of refreshment, we reserve the right to bar the participant from all KEEN activities if they fail to stop this practice at our request.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

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Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Medication Policy

KEEN's insurance policy does not cover us for administering medication of any kind. As a result, all KEEN Session Buddies, employees and trustees are expressly forbidden from administering medication, including prescription medication. This does not preclude parents or guardian from administering medication during a KEEN Session when no KEEN staff, Session Buddy or trustee is involved in any way in the process.

Parents or carers requesting that KEEN Session Buddies, employees or trustees administer medication or take responsibility for the administration of medication of any kind must be informed of this policy. This policy applies equally for participants in the KEEN Buddies Scheme. Should Parents or carers have specific concerns regarding medication which must be administered during a Buddy visit, the concerns should be raised with the Staff Supervisor before the visit takes place.

What is permissible however is that a KEEN Session Buddy, employee or trustee can observe and report back if a participant has taken their own medication providing that they are not involved in any other way.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Data Protection, Confidentiality and Security of Information Policy

In undertaking our various activities KEEN finds it necessary to hold various items of personal information. This Data Protection, Confidentiality and Security of Information Policy describes how this information will be kept and managed with the intention of complying with the Data Protection Act 2018 and other relevant data protection regulations and ensuring that information is retained for the minimum period of time and in a safe and secure way.

Our Data Protection and Retention Policy has been developed specifically to meet the requirements of the Data Protection Act 2018 and to represent good administrative practice.

Due to its length, this policy is stored separately and is available on our website.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

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Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Social Media and Communications Policy

A guide for staff on using forms of communication, including social media to promote the work of KEEN and in a personal capacity

Notices and general communication

Any of the following are acceptable forms of communication, provided that every individual with a right to be included within the communication is so.

- Email
- Telephone
- Post
- Social media platforms including Facebook messenger, Instagram

Our understanding of Social Media

What is social media?

Social media is the term given to web-based tools and applications which enable users to create and share content (words, images and video content), and network with each other through the sharing of information, opinions, knowledge and common interests. Examples of social media include Facebook, Twitter, LinkedIn and Instagram.

Why do we use social media?

Social media is essential to the success of communicating KEEN's work. It is important for some staff to participate in social media to engage with our audience, participate in relevant conversations and raise the profile of KEEN's work.

Why do we need a social media policy?

The difference between a personal and professional opinion can be blurred on social media, particularly if you're discussing issues relating to KEEN's work. While we encourage the use of social media, we have certain standards, outlined in this policy, which we require everyone to observe. Publication and commentary on social media carries similar obligations to any other kind of publication or commentary in the public domain.

This policy is intended for all *staff members, trustees, participants, volunteers, and other groups engaged by KEEN*, and applies to content posted on both a *KEEN* device and a personal device. Before engaging in work-related social media activity, staff must read this policy.

Setting out the social media policy

This policy sets out guidelines on how social media should be used to support the delivery and promotion of KEEN, and the use of social media by staff in both a professional and personal capacity. It sets out what you need to be aware of when interacting in these spaces and is designed to help staff support and expand our official social media channels, while protecting the charity and its reputation and preventing any legal issues.

Internet access and monitoring usage

There are currently no access restrictions to any of our social media sites in the KEEN office. However, when using the internet at work, it is important that staff refer to the *KEEN IT Policy*. You are permitted to make reasonable and appropriate use of personal social media activity during your lunch breaks. But usage should not be excessive and interfere with your duties.

Point of contact for social media

Our Executive Director is responsible for the day-to-day publishing, monitoring and management of our social media channels. If you have specific questions about any aspect of these channels, speak to the Executive Director. No other staff member can post content on KEEN's official channels without the permission of the Executive Director.

Which social media channels do we use?

Social media channels in use can be found on our website www.keenuk.org, but include Facebook, Instagram, LinkedIn, and Twitter.

We use our social media accounts to share news with supporters and to encourage people to become involved in our work. They are all aimed at general audiences

Core guidelines for the use of Social Media

Conduct when using KEEN's social media channels

1. The Executive Director is responsible for setting up and managing KEEN's social media channels. Only those authorised to do so by them will have access to these accounts.
2. Our digital communications officer responds to comments Monday-Friday, 9am-5pm, and then on evenings and weekends we have a social media out-of-hours rota, covered by the whole communications team.
3. Be an ambassador for our brand. Staff should ensure they reflect KEEN values in what they post and use our tone of voice. Our brand guidelines set out our tone of voice that all staff should refer to when posting content on KEEN's social media channels.
4. Make sure that all social media content has a purpose and a benefit for KEEN, and accurately reflects KEEN's agreed position.
5. Bring value to our audience(s). Answer their questions, help and engage with them
6. Take care with the presentation of content. Make sure that there are no typos, misspellings or grammatical errors. Also check the quality of images.
7. Always pause and think before posting. That said, reply to comments in a timely manner, when a response is appropriate.
8. If staff outside of our Social Media Team as defined by the Executive Director wish to contribute content for social media, whether non-paid for or paid for advertising, they should speak to the Executive Director about this.

9. Staff shouldn't post content about supporters or service users without their express permission. If staff are sharing information about supporters, service users or third party organisations, this content should be clearly labelled so our audiences know it has not come directly from KEEN. If using interviews, videos or photos that clearly identify a child or young person, staff must ensure they have the consent of a parent or guardian before using them on social media.

10. Always check facts. Staff should not automatically assume that material is accurate and should take reasonable steps where necessary to seek verification, for example, by checking data/statistics and being wary of photo manipulation.

11. Be honest. Say what you know to be true or have a good source for. If you've made a mistake, don't be afraid to admit it.

12. Staff should refrain from offering personal opinions via KEEN's social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about KEEN's position on a particular issue, please speak to the Executive Director.

13. It is vital that KEEN does not encourage others to risk their personal safety or that of others, to gather materials. For example, a video of a stunt.

14. Staff should not encourage people to break the law to supply material for social media, such as using unauthorised video footage. All relevant rights for usage must be obtained before publishing material.

15. Staff should not set up other Facebook groups or pages, Twitter accounts or any other social media channels on behalf of KEEN. This could confuse messaging and brand awareness. By having official social media accounts in place, KEEN can ensure consistency of the brand and focus on building a strong following.

16. KEEN is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. We have every right to express views on policy, including the policies of parties, but we can't tell people how to vote.

17. If a complaint is made on KEEN's social media channels, staff should seek advice from the Executive Director before responding. If they are not available, then staff should speak to the Chair of Trustees.

18. Sometimes issues can arise on social media which can escalate into a crisis situation because they are sensitive or risk serious damage to the charity's reputation. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity.

The Social Media Team regularly monitors our social media spaces for mentions of KEEN so we can catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis situation, the Social Media Team will report to the Executive Director in the first instance.

If any staff outside of the Social Media Team become aware of any comments online that they think have the potential to escalate into a crisis, whether on KEEN's social media channels or elsewhere, they should speak to the Executive Director immediately.

Conduct when using personal social media accounts

This policy does not intend to inhibit personal use of social media but instead flags up those areas in which conflicts might arise. KEEN staff are expected to behave appropriately, and in ways that are consistent with KEEN's values and policies, both online and in real life.

1. Be aware that any information you make public could affect how people perceive KEEN. You must make it clear when you are speaking for yourself and not on behalf of KEEN. If you are using your personal social media accounts to promote and talk about KEEN's work, you must use a disclaimer such as: "The views expressed on this site are my own and don't necessarily represent KEEN's positions, policies or opinions."

2. Staff who have a personal blog or website which indicates in any way that they work at KEEN should discuss any potential conflicts of interest with their line manager and the Executive Director. Similarly, staff who want to start blogging and wish to say that they work for KEEN should discuss any potential conflicts of interest with their line manager and the Executive Director.

3. Those in senior management, and specialist roles where they are well known in their field of expertise, must take particular care as personal views published may be misunderstood as expressing KEEN's view.

4. Use common sense and good judgement. Be aware of your association with KEEN and ensure your profile and related content is consistent with how you wish to present yourself to the *general public, colleagues, partners and funders*.

5. KEEN occasionally works with high profile people. Please don't approach high profile people from your personal social media accounts to ask them to support the charity, as this could hinder any potential relationships that are being managed by Executive Director. This includes asking for retweets about the charity.

If you have any information about high profile people that have a connection to our cause, or if there is someone who you would like to support the charity, please speak to the Executive Director to share the details.

7. If a staff member is contacted by the press about their social media posts that relate to KEEN, they should talk to the Executive Director immediately and under no circumstances respond directly.

8. KEEN is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. When representing KEEN, staff are expected to hold KEEN's position of neutrality. Staff who are politically active in their spare time need to be clear in separating their personal political identity from KEEN, and understand and avoid potential conflicts of interest.

9. Never use KEEN's logos or trademarks unless approved to do so. Permission to use logos should be requested from the Executive Director.

10. Always protect yourself and the charity. Be careful with your privacy online and be cautious when sharing personal information. What you publish is widely accessible and will be around for a long time, so do consider the content carefully. When you are using social media sites at work, it is

important that you do so safely. You can find more information on your responsibilities when using our computer systems in our *KEEN IT Policy*.

11. Think about your reputation as well as the charity's. Express your opinions and deal with differences of opinion respectfully. Don't insult people or treat them badly. Passionate discussions and debates are fine, but you should always be respectful of others and their opinions. Be polite and the first to correct your own mistakes.

12. We encourage staff to share tweets and posts that we have issued. When online in a personal capacity, you might also see opportunities to comment on or support KEEN and the work we do. Where appropriate and using the guidelines within this policy, we encourage staff to do this as it provides a human voice and raises our profile. However, if the content is controversial or misrepresented, please highlight this to the Executive Director who will respond as appropriate.

Further guidelines

Libel

Libel is when a false written statement that is damaging to a person's reputation is published online or in print. Whether staff are posting content on social media as part of their job or in a personal capacity, they should not bring KEEN into disrepute by making defamatory comments about individuals or other organisations or groups. All comments should be phrased in a positive way.

Copyright law

It is critical that all staff abide by the laws governing copyright, under the Copyright, Designs and Patents Act 1988. Never use or adapt someone else's images or written content without permission. Failing to acknowledge the source/author/resource citation, where permission has been given to reproduce content, is also considered a breach of copyright.

Confidentiality

Any communications that staff make in a personal capacity must not breach confidentiality. For example, information meant for internal use only or information that KEEN is not ready to disclose yet. For example, a news story that is embargoed for a particular date. Please refer to our *Confidentiality Policy* for further information.

Discrimination and harassment

Staff should not post content that could be considered discriminatory against, or bullying or harassment of, any individual, on either an official KEEN social media channel or a personal account. For example:

- making offensive or derogatory comments relating to sex, gender, race, disability, sexual orientation, age, religion or belief
- using social media to bully another individual
- posting images that are discriminatory or offensive or links to such content

Lobbying act

Charities are legally allowed to campaign to bring about a change in policy or law to further their organisational purpose. In most cases, spending on charity campaigns that are in accordance with charity law will not be regulated under electoral law. However, the Lobbying Act, which was

passed in January 2014, states that during national elections (known as regulated periods) spending on campaigning activities may be regulated.

Charities which spend more than £20,000 in England or £10,000 in Scotland, Wales or Northern Ireland, during the regulated period, need to register with the Electoral Commission. To abide by the Lobbying Act, campaigning activities on social media must not be seen as intending to influence people's voting choice. During these periods, all campaigning activity will be reviewed by the Executive Director.

Use of social media in the recruitment process

Recruitment should be carried out in accordance with the KEEN *Recruitment Policy*, and associated procedures and guidelines. Any advertising of vacancies should be done through HR and the Executive Director.

There should be no systematic or routine checking of candidate's online social media activities during the recruitment process, as conducting these searches might lead to a presumption that an applicant's protected characteristics, such as religious beliefs or sexual orientation, played a part in a recruitment decision. This is in line with KEEN's *Equality, Diversity, and Inclusion Policy*.

Protection and intervention

The responsibility for measures of protection and intervention lies first with the social networking site itself. Different social networking sites offer different models of interventions in different areas. For more information, refer to the guidance available on the social networking site itself. For example, Facebook. However, if a staff member considers that a person/people is/are at risk of harm, they should report this to the Executive Director immediately.

Under 18s and vulnerable people

Young and vulnerable people face risks when using social networking sites. They may be at risk of being bullied, publishing sensitive and personal information on their profiles, or from becoming targets for online grooming.

Where known, when communicating with young people under 18-years-old via social media, staff should ensure the online relationship with KEEN follows the same rules as the offline 'real-life' relationship. Staff should ensure that young people have been made aware of the risks of communicating and sharing information online, and given guidance on security/privacy settings as necessary. Staff should also ensure that the site itself is suitable for the young person and KEEN content and other content is appropriate for them. Please refer to our *Safeguarding and Protecting Children and Vulnerable Adults Policy*.

Responsibilities and breach of policy

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of KEEN is not a right but an opportunity, so it must be treated seriously and with respect. For staff, breaches of policy may incur disciplinary action, depending on the severity of the issue. Please refer to the KEEN *Disciplinary Policy* for further information on disciplinary procedures. Staff who are unsure about whether something they propose to do on social media might breach this policy, should seek advice from the Executive Director

Public Interest Disclosure

Under the Public Interest Disclosure Act 1998, if a staff member releases information through KEEN's social media channels that is considered to be in the interest of the public, KEEN's *Whistleblowing Policy* must be initiated before any further action is taken.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a long horizontal flourish extending to the right.

Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Fundraising Policy

Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and vulnerable people in England, namely:

- Code of Fundraising Practice Legal Principles: Fundraising Regulator

General principles

- KEEN will not denigrate other individuals or organisations.
- KEEN will not exaggerate facts relating to the potential beneficiary.
- KEEN will not take advantage of mistakes made by the donor.
- KEEN will take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about any donation. This **MUST** include taking into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.
- KEEN will not exploit the credulity, lack of knowledge, apparent need for care and support or vulnerable circumstances of any donor at any point in time. There is more information available about responding to the needs of people in vulnerable circumstances and helping donors to make informed decisions in the Institute of Fundraising's ['Treating Donors Fairly' Guidance](#).
- KEEN knows or has reasonable grounds for believing that an individual lacks capacity to make a decision to donate, a donation will not be taken.
- A donation given by someone who lacked capacity at the time of donating will be returned.

KEEN will not engage in fundraising which:

- Is an unreasonable intrusion on a person's privacy
- Is unreasonably persistent
- Places undue pressure on a person to donate

KEEN will not continue to ask an individual for support if:

- that person clearly indicates – by word or gesture – that they do not wish to continue to engage
- they have reasonable grounds for believing, in the course of their engagement with the individual, that they are in vulnerable circumstances which mean they are unable to make an informed decision to donate.

During the donation

Requesting donations

When using donor information in a case study or any other type of publicity, organisations KEEN must comply with any duties of confidentiality that they have and comply with data protection law if publishing a case study that includes information that could identify a donor. KEEN must not encourage existing donors in any way to change an existing charitable donation to another fundraising organisation.

The Charities Act 1992, and Charities and Trustee Investment (Scotland) Act 2005 allow charities to obtain a court order preventing unauthorised fundraising where any individual is using fundraising methods to which the charity objects or where the charity believes that an individual is not a fit and proper person to raise funds on its behalf.

Acceptance and refusal of donations

The trustees (and their delegates) of KEEN must act in the best interests of the charity when deciding to accept or refuse a particular donation.

Rewards/incentives and benefit packages

It is common for organisations to engage a donor by offering them benefits related to the size and frequency of the gift. KEEN must ensure that benefits are appropriate for the organisation to be giving, and proportionate to the size of the gift. KEEN must be aware of when benefits nullify potential tax relief such as Gift Aid or top-up payments available under the small donation rules. If benefits do prevent the donation qualifying under Gift Aid or the small donation rules, KEEN must not attempt to reclaim tax on the sum.

After the donation

Any specified reporting requirements to which a donation is subject **must** be complied with. KEEN must only make a Gift Aid reclaim in respect of a donation if all of the Gift Aid conditions are met. One of these is that a donor's Gift Aid declaration **must** comply with the new guidance issued by HMRC setting out the information that declarations are required to include from 1st January 2013. Where a donation is not eligible for Gift Aid and the organisation wishes to make a claim under the small donations rules, it **must** do so if all of the small donation conditions are satisfied.

KEEN must ensure that accepted donations are used to support the cause in accordance with the conditions attached to the donation, which may arise from donor's stipulations or representations made by the charity as to the uses of the funds.

Use of funds

The law in relation to changing the terms of a gift is complex and organisations should obtain advice from legal advisers or the Charity Commission / Office of the Scottish Charity Regulator (OSCR) before seeking to change the terms, even if there is donor consent. In Scotland, in cases where donor consent cannot be obtained, OSCR can permit the restricted fund under which a gift is held to be 'reorganised' if certain conditions are met, but only where it is not possible to ascertain the donor's wishes in relation to the proposed change. If an appeal is being run for a

particular purpose, KEEN must include a statement indicating what will happen to funds received if the total funds raised are insufficient or exceed the target.

Complaints

KEEN must have a clear and publicly available complaints procedure which **must** also apply to any Third Parties fundraising on their behalf. When dealing with complaints KEEN must ensure that complaints are investigated thoroughly and objectively to establish the facts of the case, avoiding undue delay; and complaints are responded to fairly, proportionately and appropriately.

Review and amendments

KEEN must regularly review any lessons to be learnt from complaints and use that learning to inform future fundraising activity. KEEN must have a clear and published internal procedure for Participants of staff and Team Members to report any concerns they may have regarding their organisation's fundraising practice, including:

- the type of issues that can be raised and the process for doing so
- how the person raising a concern will be protected from victimisation and harassment
- how and what the organisation will do in response to receiving such information
- how an individual can escalate their concerns on fundraising practice to the Fundraising Regulator or the Independent Fundraising Standards and Adjudication Panel for Scotland in the event that internal consideration is not possible.

Returning donations

KEEN must not return donations unless certain criteria are fulfilled (further guidance can be found in the Institute of Fundraising's [Acceptance, refusal and return: A practical guide to dealing with donations](#)). For all other fundraising organisations, donations **must** only be refunded in line with any policies or in exceptional circumstances. It may not be lawful to return a donation and fundraisers **must** take advice from legal advisers or the Charity Commission / OSCR before doing so.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Compliments, Comments, and Complaints Policy

We strive for excellence in everything that we do, but we realise that sometimes we get things wrong and that not everyone will agree with what we do. We welcome and value feedback as this enables us to listen, learn, and to improve what we do and how. In short, your compliments, comments and complaints help us continue to strive for excellence and help to give children the start in life they deserve.

Who this policy is for

This policy applies to individuals (members of the public) and organisations wishing to comment on, compliment or complain about the performance of services, fundraising activities, the suitability of campaigns and the conduct of employees, volunteers, contractors and third parties working with or representing KEEN.

This policy does not apply to KEEN employees, agency workers, interns, secondees, contractors, consultants and trustees. In the event that they wish to make a complaint, they should refer to the relevant KEEN policies e.g. Grievance Policy, Whistleblowing Policy and the Safeguarding & Child Protection policy as appropriate. Neither does this policy apply to volunteers, including those who provide an KEEN service (eg Childline volunteers), who may use KEEN Volunteer Issue Resolution Policy as well as the Whistleblowing and Safeguarding & Child Protection policy as appropriate. Those persons to whom this policy does not apply should make their compliments and comments to their line manager or persons to whom they consider their compliments/comments are most relevant.

Legal Framework and Guidance

This Complaints Policy takes into account relevant legal requirements, regulations and guidance, including:

- The Children Acts 1989 and 2004;
- Protection of Children (Scotland) Act 2003, the Children (Northern Ireland) Order 1995 and other legislation relating to children in Scotland, Wales, Northern Ireland and the Channel Islands;
- Working Together to Safeguard Children 2015;
- Statutory guidance relevant to KEEN issued by KEEN's regulators including the Charity Commission;
- The Fundraising Regulator's Code of Fundraising Practice, Fundraising Promise and Rulebooks for Face-to-Face Fundraising;
- Good Governance: a Code for the Voluntary and Community sector;
- Data Protection Act 2018;
- Charities (Protection and Social Investments) Act 2016.

Complimenting us

Compliments are valuable, and important to us and when they are received, they will be recorded and reported on. Compliments enable us to:

- understand from our supporters and stakeholders what we do well and the positive difference this makes
- provide positive feedback to our people – whether paid or unpaid
- influence the continued development of what we do, why and how.

Commenting on our people or our work

It is always helpful to hear what people think about us; what we do and how. Compliments and comments are welcome because they:

- help to influence the organisational decisions we may make;
- help maintain the standards of our activities;
- raise issues of real importance and can lead to change for the better.

Wherever we can, we will record and report, internally and externally if required, on comments we receive. We will endeavour to acknowledge compliments and comments wherever possible but whilst this may not always be practicable, please be assured that they are always appreciated.

Complaining about our people or our work

We recognise that there will be times when our trustees, staff and volunteers or third parties working on our behalf make mistakes, or get things wrong. Where this happens and where we receive a complaint, we will always take this seriously, record and report on it internally and externally if required, and deal with it in a timely manner.

We will always take steps to maintain the confidentiality of your personal information. We will only disclose it to people who need to look into your complaint, and, rarely, to others where we are legally permitted to do so.

Defining a 'complaint'

We define a complaint as “an expression of dissatisfaction, however made about actions taken or a lack of action by KEEN, or someone acting on behalf of KEEN.” Where it is unclear whether a communication is indeed a complaint, we will endeavour to confirm this with you, in so far as we can. If the communication or comment is done anonymously, we may not be able to treat it as a complaint under this policy.

The following issues (this is not an exhaustive list) will be treated as complaints as they touch upon KEEN's purpose and values:

- inappropriate/improper fundraising methods;

- poor standards of service including accusations of professional incompetence/misconduct;
- financial losses/waste;
- current or non-current (historic) harm to children or vulnerable individuals by KEEN (see the Management of Safeguarding Allegations procedure or Non-recent Historical Abuse policy).
- criminality within or involving KEEN;
- KEEN being deliberately used for significant private advantage;
- non-compliance with KEEN's own policies/procedures;
- non-compliance with relevant laws and regulations.

Please note: under certain circumstances we may not be able to respond to a complaint including where:

- you have not identified yourself or provided your contact details;
- your complaint is not about KEEN;
- your expression of the complaint is insufficiently clear;
- your complaint has been sent to us and other organisations as part of a bulk mailing or email.

However, KEEN will still take the complaints seriously and deal with them appropriately, including contacting you where we are able to, to discuss the matter further.

Sharing your compliments, comments, and complaints with us

Set out below are the details of how and to whom you should submit your feedback:

Complaints relating to KEEN Executive Director or a Trustee ONLY:

By email: governance@keenoxford.org.uk

By phone: 07583 444 409

In writing to: Head of Governance, Address, Address

ALL OTHER Compliments, Comments & Complaints:

By email: keen@keenoxford.org

By phone: 07806 743 595

In writing to: St Clement's Centre, Oxford, OX1 3DH

Our process for dealing with complaints

Where a complaint has been submitted in accordance with this policy, a member of KEEN staff or a KEEN trustee will acknowledge your complaint within five working days, explain the process that will be followed and when a decision will be made. Following a thorough and fair investigation by us to establish the surrounding the complaint, we will always attempt to provide a full written response within 15 working days. There may be occasions where this is not possible, and we will always notify you of this and advise you of the date by which you are likely to receive a response to

your complaint against KEEN.

When notifying you of the outcome of our investigation and any follow up action taken, we will confirm to whom you should submit an appeal in the event that you wish to contest the outcome. An appeal must be submitted in writing within 15 working days from the date of the letter notifying you of the outcome and must satisfy one or more of the criteria in **section 9** below.

Appealing our response

Any appeal must be in writing and satisfy one or more of the following criteria: you have new, relevant information to present (which you have not previously submitted); we have failed to consider adequately or at all information you provided in connection with the complaint; the response to your complaint is perverse in that no reasonable person could have reached that conclusion based on the information provided to them.

We will acknowledge receipt of your appeal within five working days. We will always attempt to provide a full response to your appeal within 15 working days. There may be occasions where this is not possible, and where this is the case, we will always advise you and notify you of a date by when you may receive a response. Our outcome response, which will always be in writing, is final; there will be no further redress within KEEN but listed in **section 11** below are external

Taking your complaint outside of KEEN

In the event that you remain dissatisfied with the response you have received, you are entitled to take your concerns to any relevant statutory body, including but not limited to:

- The Charity Commission (England & Wales): <https://www.gov.uk/complain-about-charity>
- The Fundraising Regulator:
<http://www.fundraisingregulator.org.uk/make-a-complaint/complaints>
- The Advertising Standards Authority: <https://www.asa.org.uk/>
- The Information Commissioner's Office: www.ico.org.uk

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees
Date: 29th January 2019

KEEN Risk Management Policy

The policy forms part of the KEEN's internal control and governance arrangements. It explains KEEN's underlying approach to risk management, documents the roles and responsibilities of the Board and other key parties. It also outlines key aspects of the risk management process, and identifies the main reporting procedures. In addition, it describes the process the Board will use to evaluate the effectiveness of KEEN's internal control procedures.

Underlying approach to risk management

The following key principles outline KEEN's approach to risk management and internal control:

- the Board has responsibility for overseeing risk management within KEEN as a whole
- an open and receptive approach to solving risk problems is adopted by the Board
- staff and key volunteers support, advise and implement policies approved by the Board
- KEEN makes conservative and prudent recognition and disclosure of the financial and non-financial implications of risks
- all staff are responsible for encouraging good risk management practice within their areas of work
- key risks will be identified by the Board and closely monitored on a regular basis

Role of the Board of Trustees

The Board has a fundamental role to play in the management of risk. Its role is to:

- Set the tone and influence the culture of risk management within KEEN, including (1) communicating the KEEN's approach to risk, (2) determining what types of risk are acceptable and which are not, (3) setting the standards and expectations of staff with respect to conduct and probity.
- Determine the appropriate risk appetite or level of exposure for KEEN.
- Approve major decisions affecting KEEN's risk profile or exposure.
- Identify risks and monitor the management of fundamental risks to reduce the likelihood of unwelcome surprises.
- Satisfy itself that the less fundamental risks are being actively managed, with the appropriate controls in place and working effectively.
- Annually review the KEEN's approach to risk management and approve changes or improvements to key elements of its processes and procedures.

Role of Key Staff and Volunteers

Roles of key staff and volunteers are to:

- Develop alongside Trustees our approach to risk management

- Implement policies on risk management and internal control
- Identify and evaluate the fundamental risks faced by KEEN for consideration by the Board
- Provide adequate information in a timely manner to the Board and its sub-committees on the status of risks and controls
- Undertake an annual review of effectiveness of the system of internal control and provide a report to the Board

Risk management as part of the system of internal control

The system of internal control incorporates risk management. This system encompasses a number of elements that together facilitate an effective and efficient operation, enabling KEEN to respond to a variety of operational, financial, and commercial risks. These elements include:

Policies and Procedures

Attached to fundamental risks are a series of policies that underpin the internal control process. The policies are set by the Board and implemented and communicated to staff. Written procedures support the policies where appropriate.

Reporting

Comprehensive reporting is designed to monitor key risks and their controls. Decisions to rectify problems are made at regular meetings of the Board.

Business planning and budgeting

The business planning and budgeting process is used to set objectives, agree action plans, and allocate resources. Progress towards meeting business plan objectives is monitored regularly.

Self assurance process

The annual self assurance process is the mechanism by which we assess whether we are fit to receive public funds. The process assists in providing assurance that our structures, plans, policies and procedures are constantly monitored and improved so as to achieve our objectives and manage our funds effectively.

External audits

External audit provides feedback to the Board on the operation of the internal controls reviewed as part of the annual audit.

From time to time, the use of external consultants will be necessary in areas such as health and safety, and human resources. The use of specialist third parties for consulting and reporting can increase the reliability of the internal control system.

Risk management process

KEEN operates a risk management process/framework as follows:

- A review/appraisal of the previous year's risk management report
- A 'risk identification' exercise for the year ahead
- Evaluation of identified risks using risk assessments
- Manage risks through application of risk management techniques
- Record and monitor risks using risk registers
- Assigning responsibility for risks to appropriate personnel

Risk identification is not an annual process. Board/Staff members are encouraged to report and update risk registers and carry out assessments throughout the year.

Annual review of effectiveness

The Board is responsible for reviewing the effectiveness of internal control of KEEN, based on information provided by the senior employees. Its approach is outlined below.

For each fundamental risk identified, the board will:

- review the previous year and examine the KEEN's track record on risk management and internal control
- consider the internal and external risk profile of the coming year and consider if current internal control arrangements are likely to be effective.

In making its decision the Board will consider the following aspects.

Control environment

- KEEN's objectives and its financial and non-financial targets
- organisational structure and calibre of the staff/key volunteers
- culture, approach, and resources with respect to the management of risk
- delegation of authority
- public reporting

Ongoing identification and evaluation of fundamental risks

- timely identification and assessment of fundamental risks
- prioritisation of risks and the allocation of resources to address areas of high exposure

Information and communication

- quality and timeliness of information on fundamental risks
- time it takes for control breakdowns to be recognised or new risks to be identified

Monitoring and corrective action

- ability of KEEN to learn from its problems
- commitment and speed with which corrective actions are implemented

The delegated member of staff responsible for risk management will prepare a report of its review of the effectiveness of the internal control system annually for consideration by the Board.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a stylized, cursive script.

Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Financial Reserves Policy

KEEN understands that the Charity Commission has set out guidance in “Charities reserves: building resilience” (CC19), and that a reserves policy explains to existing and potential funders, donors, beneficiaries and other stakeholders why a charity is holding a particular amount of reserves. Our policy aims to give confidence to stakeholders that the charity’s finances are being properly managed and will also provide an indicator of future funding needs and its overall resilience.

Our Policy

KEEN will maintain sufficient reserves to enable it to meet its short-term financial obligations in the event of an unexpected revenue shortfall and to allow KEEN to be managed efficiently and to provide a buffer that would ensure uninterrupted services.

Our main short term obligations are to our employees and rent; we estimate that we need to retain £35,000 of reserves to meet these liabilities in the event of a shortfall in our income.

While we expect to reduce our costs in response to falling income before we need to consider accessing our reserves, a majority of trustees can agree to release some or all of this reserve against specific circumstances. These might include:

1. To fill a gap in available funds on a defined short term basis against an agreed process to fill the identified funding gap.
2. To meet an unexpected one-off cost.
3. To provide a ‘bridging loan’ in support of an agreed expansion activity in advance of identified new funds becoming available.
4. As part of the process of running down the charity.

In the case of items 1 to 3 above we expect the money that is released to be replaced within a reasonable period of time.

Why we need reserves for the charity to be effective

Reasons for which reserves are required:

- a) The risk of unforeseen emergency or other unexpected need for funds, eg an unexpected large repair bill or finding ‘seed-funding’ for an urgent project.
- b) Covering unforeseen day-to-day operational costs, eg employing temporary staff to cover a long-term sick absence.
- c) A source of income, eg a grant, not being renewed. Funds might be needed to give the trustees time to take action if income falls below expectations.

- d) Planned commitments, or designations, that cannot be met by future income alone, eg plans for a major asset purchase or to a significant project that requires the charity to provide 'matched funding'.
- e) The need to fund short-term deficits in a cash budget, eg money may need to be spent before a funding grant is received

Justifying our required reserves level

To ensure that there is no significant disruption to our charitable activities, holding appropriate reserves will enable the organisation to respond to any unforeseen reduction in income (for example when income does not reach expected levels); or additional expenditure (for example when projects overrun or unplanned events occur).

We have based our projections for the appropriate amount of reserves we require on the basis that the reserves in our target range would provide short-term until long-term solutions can be established.

Comparing what we need in reserve with what we actually hold

Aims in this section

- Calculate the amount of any reserves according to the definition of reserves given in section 3.1 of the guidance
- State the amount of reserves held and compare with the target amount or target range set for reserves
- Explain any shortfall or excess in reserves against target set
- Explain any action being taken or planned to bring reserves into line with your target

Ongoing review and declaration

A detailed review of the financial risks we face is monitored on an ongoing basis, and our assessments on the possible financial impact of those risks have been incorporated into the reserves range we have calculated.

As part of our annual Trustees' Report and Accounts and as part of our commitment to transparency, we publish the principal risks and uncertainties facing our organisation; and the mitigations we have put in place to manage them as far as reasonably possible.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **10th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a stylized, cursive script.

Signed: Jim McMahon, Chair of Trustees
Date: 10th January 2019

KEEN Staff Supervision Policy

KEEN recognises that supervision is a key tool for planning an organisation's work. The main purposes of supervision sessions of KEEN staff are to:

- Monitor work and work performance
- Evaluate work and performance
- Help the worker improve his or her practice
- Identify training needs and evaluate recent training undertaken. Clarify priorities
- Share information about work
- Provide an opportunity to discuss how the worker and supervisor feel about the work
- Recognise and deal with existing or potential problems
- Discuss how outside factors are affecting work
- Provide a framework for discussing and agreeing change

Supervision arrangements

Supervision sessions:

- Will be held in a comfortable and private setting
- Will be recorded accurately and confirmed by both parties
- Will be held every [4,6, 8 weeks] for full time staff (more frequently during the first few weeks for new workers)
- Will not be cancelled except in an emergency, and if cancelled or missed should be rescheduled immediately.
- Employees will be supervised by their line manager, and the chief officer by a
- Trustee (usually the Chair).

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Staff Training Policy

As a learning organisation, KEEN recognises that its staff, with their commitment, skills and abilities are the most valuable resource of the organisation. KEEN is keen to help staff develop and to bridge through training any gaps in knowledge and skill that are required to assist KEEN achieve its objectives.

Training should be of value both to KEEN and the individual member of staff. It should be work orientated and have a discernible benefit for both in the foreseeable future: for example, it may be concerned with the development of specific skills or gaining information directly related to the job. It may also be concerned with the development of individual confidence, interpersonal skills and background understanding relevant to the tasks of a voluntary agency such as KEEN.

This policy is to be read in conjunction with the following policies:

- Staff supervision
- Recruitment and selection

Assessing training need

The staff member should discuss their training needs with her or his line manager and agree what training is appropriate. All staff and volunteers should be having regular supervision sessions with their line manager. The discussion of training requirements should form part of these sessions. As part of these discussions staff and managers should consider the requirements of KEEN's strategic plan. The approval of the Executive Director should be sought.

As a result of these supervision sessions and the requirements of KEEN's objectives, a Training Plan will be produced. This Training Plan will be the basis for producing the training budget.

Where course fees are particularly expensive or attendance on the course involves a heavy commitment of time, factors which will be taken into account in deciding whether to give or withhold approval are the financial situation, the workload which would require to be covered and whether the course in question is essential to the work of the staff member and the needs of KEEN.

Special consideration will be given within the context of KEEN's Diversity and Equal Opportunities Policy to staff who require the development of particular skills to allow them to undertake their work effectively. A record will be kept of training undertaken by individual staff members. All staff and volunteers should have access to the training and development required of them to fulfil their roles.

Short courses

Within the parameters set out above, KEEN will allow paid time off work and cover the full costs of attending short courses. It is KEEN's intention to work towards setting indicative training budgets for individual members of staff. The training budget will be reviewed annually as part of the budget-making process.

The need for, and proposals for, programmes of training for the staff group as a whole can be raised by any member of staff and should be discussed at staff meetings. Where appropriate the approval of the Chair and/or Trustee Board should be sought for the arrangements for meeting the needs identified.

Similarly, the staff meeting is the appropriate place for any staff member to first raise proposals for training for the organisation as a whole i.e. exclusively for or involving Trustees. A report may be made to the Chair and/or Trustee Board as appropriate.

Conferences

Attendance at conferences may be a normal and essential part of an individual's work, but at times it may also be more properly considered as a development experience for the individual concerned. Either way, attendance at conferences should be discussed with the staff member's line manager and the approval of the Executive Director sought.

Training as part of normal work

"Training" does not mean only attendance on formal courses. It should be a conscious part of normal work. In particular, it is the responsibility of line managers, as part of the managerial support they give to staff, to assist their colleagues to improve their skills and understanding, to reflect on work events and to learn from experience.

(Note: Attendance at agreed work-related training, courses and conferences during evenings/weekends will be compensated by equal time off in lieu).

Longer courses

KEEN recognises that some courses, especially those leading to formal qualifications, require a longer commitment of time and that the costs of study may represent a considerable financial burden to the individual. KEEN wishes to be able to assist staff to undertake relevant courses of study. Such a commitment, however, has to be balanced against KEEN's limited staff and financial resources. The following procedures, therefore will apply:

The course of study should be of value both to KEEN and to the individual. It should be work-orientated and have a discernible benefit for both sides in the foreseeable future. Individuals thinking of asking for study leave and /or assistance with the costs of study should first discuss their intention with their line manager.

Formal requests for study leave /or assistance with the costs of study should be made to the Executive Director who shall consider the request and make a recommendation to the Chair and/or Trustee Board as appropriate.

In determining whether or not to recommend/agree a request for study leave and/or assistance with the cost of study, the Executive Director/Chair and/or Trustee Board will take into account:

- The relevance of the intended course to the work of KEEN
- The possibility of arrangements to cover for absences involved
- The financial situation

In a situation of competing demands against limited staff cover/financial resources KEEN will weight decisions on study leave and/or assistance with the costs of study towards relatively less well qualified staff and staff who have been with KEEN for a considerable period.

With regard to the costs of study, KEEN will consider covering all the fees or a proportion of them, and making a contribution to the costs of books, residential sessions etc. The Executive Director will recommend/ the Chair and/or Trustee Board decide what is a relevant contribution in the light of the circumstances of each case.

The Chair and/or Trustee Board may decide to attach conditions to assistance given, for example, continuance of financial assistance being contingent upon KEEN being satisfied that the staff member is showing satisfactory progress in her or his studies and/or sits for an examination within a reasonable period of time etc.

In addition, certain training may be made dependent on agreement to a training contract that requires repayment of costs should the staff member leave employment. Such arrangements would be discussed and agreed in writing with the staff member in advance.

Where repayment of financial assistance is required this shall not include salary paid in respect of time spent on the agreed course of study.

Line managers will use subsequent supervision sessions to review the impact of any training and development. On a quarterly basis the managers will review the Training Plan and update it before circulation to the Trustee Board.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN IT Policy

This policy is intended to safeguard KEEN's hardware and software. All computer equipment and software is the property of KEEN – staff and volunteers are only authorised to use the packages provided on the system.

Principles

Staff and volunteers should ensure documents are created to reflect KEEN's house style format. Font should be Lato and size 10/11. Headings are in bold and not underlined.

If you wish to use anything else on the computers, then you must be authorised to do so by your line manager. This includes loading files and/or software from a non-accredited source.

Computer configurations or system changes must be authorised by the Executive Director.

Staff are permitted to use computer equipment (with the prior authorisation of the Executive Director) out of working hours ensuring KEEN's policy on Health and Safety is adhered to.

Personal use of these facilities by an employee for a reasonable and specific purpose will be authorised at the discretion of the Executive Director.

The installation or use of personal facilities (i.e. personal e-mail accounts, personal accounts with Internet Service Providers) is not permitted. NOTE: All files are virus-checked by the server.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.



Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Staff Disciplinary Policy

KEEN recognises that employees should be treated fairly and this policy aims to provide consistency in the treatment of all staff.

This procedure is a framework for dealing with cases of where an individual's performance and/or conduct has failed to reach the required standard. It is designed to deal with alleged breaches of organisational policies, rules and procedures and aims to help and support employees to achieve acceptable standards of conduct. It should only be used where problems with conduct cannot be resolved through advice and encouragement, training or increased support. In cases of poor performance this procedure will only be used once an employee has been referred from the organisation's formal capability procedure.

Compliance with ACAS Code of Practice

This disciplinary procedure follows the ACAS code of practice on Disciplinary and Grievance procedures (Updated March 2015). The code is issued under section 199 of the Trade Union and Labour Relations (consolidation) Act 1992.

A failure to follow the code does not, in itself, make a person or organisation liable to proceedings. However, employment tribunals will take the Code into account when considering relevant cases. Tribunals will also be able to adjust any awards made in relevant cases by up to 25 per cent for unreasonable failure to comply with any provision of the code.

This means that if the tribunal feels that an employer has unreasonably failed to follow the guidance set out in the Code they can increase any award they have made by up to 25 per cent. Conversely, if they feel an employee has unreasonably failed to follow the guidance set out in the Code they can reduce any award they have made by up to 25 per cent.

Scope of Policy

This agreement applies to all staff who will be employed at KEEN.

General Principles

- **Fairness** – This procedure sets out to treat all employees fairly, consistently, impartially, promptly, reasonably and applied without discrimination.
- **Representation** – The employee at all stages in this procedure has the right to be represented and accompanied by their trade union representative, full-time union official or work colleague.
- **Confidentiality** – All documentation and information relating to the allegation of misconduct will not be distributed to any parties not involved with the process. Any information relating to the case will be kept in accordance with the Data Protection Act 1998. Any breach of confidence may be treated as a disciplinary case of misconduct.

- **Natural Justice** – At all stages of this process the employee will be given a full explanation of the complaint in writing and will be given the opportunity to state their case before a decision is taken. If a warning is given as part of this process, the employee will be given full support by the employer to improve their conduct.
- **Right to appeal** – At all formal stages of this policy the employee has the right to appeal. The appeals will be heard in an appeal hearing by a senior manager that has previously had no involvement with the case.
- **Recordings** – Audio/ Visual recordings of the proceedings by the employee or their companion are not acceptable at any stage of this process. Conversely the use of surveillance evidence submitted as part of the case must comply with the organisation's surveillance policy.
- **Grievance** – The disciplinary procedure is to be used separate from the grievance procedure. If the employee is already being investigated as part of the grievance procedure, the disciplinary process will not begin until the grievance has been completed.
- **Equal Opportunities** – This procedure will be applied without discrimination. If an employee has difficulty with any stage of this process due to a disability, it is their responsibility to discuss this with their manager or Human Resources as soon as possible.
- **Process** – There are four stages of disciplinary action. An employee will not normally be dismissed for the first breach of discipline unless the employee is found guilty of gross misconduct, where a penalty may be summary dismissal without pay in lieu of notice. The procedure may be implemented at any stage if the employee's alleged misconduct warrants such action.
- **Criminal Offences** – Where an employee is convicted of a criminal offence, they will not be automatically dismissed. The employer will consider if the offence is one that makes the employee unsuitable for his/her type of work or unacceptable to other employees, partners or clients of the organisation and if so whether there is suitable alternative work available. Following this consideration the employer may initiate the disciplinary process.
- **Trade Union Representatives** – Disciplinary action will not be taken against an accredited Trade Union Representative unless the circumstances are sufficiently serious to warrant immediate action. In these circumstances the Head of Human Resources and the full-time official from UNISON should be notified of the case.

The Procedure

Minor misconduct

Informal action should be taken in cases of minor misconduct. The employee will be invited to attend an informal meeting by their line-manager where an explanation of the minor misconduct will be given. The line-manager will give constructive feedback and the employee should express their views on the issue. This is separate from the formal part of this disciplinary procedure. The manager will explain to the employee what needs to be improved, and put in place any measures to support the employee. The employee's conduct will be reviewed at a later date and both parties will agree any informal action and a date for the review. Notes should be kept by the manager of this meeting but not placed on the employee's

file. The employee should be advised if their conduct or performance does not improve they will be moved to Stage 1 of this procedure.

Formal Procedure

Disciplinary Offences Guideline

Misconduct is defined as failure in personal conduct, persistent poor performance or if an employee contravenes the organisation's policies, rules and procedures. A list of possible disciplinary offences follows. Reasons for disciplinary action may include but are not limited to:

Acts of misconduct	Acts of gross misconduct
Dishonesty	Theft, fraud, deliberate falsification of records
Misuse of the organisation's name	Criminal offence which affects the individual's ability to carry out his/her job
Breach of confidentiality & data protection	Physical assault by an employee on any other person
Breach of financial regulations	Serious negligence which causes unacceptable loss, damage or injury
Misuse of the organisations equipment and materials	Serious breach of confidentiality
Engaging in activities of the premises which could bring the employer into disrepute	Deliberate falsification of financial claims including overtime, expenses or flexitime
Supplying false or misleading information when applying for employment	Deliberate serious abuse of flexitime / flexible working systems
Health and Safety issues for example threatened or actual physical assault	With reference to the appropriate policy: Serious acts of harassment / bullying / discrimination, persistent alcohol or drug abuse
Deliberate or reckless damage to the organisation's property	Wilful misconduct or disobedience of lawful and reasonable orders
Abusive, obscene language or gestures	Engaging in unauthorised employment during hours when contracted to work or during periods of designated leave, for example sick leave or time off for training, etc.
Failure to observe establish health and safety rules and report accidents or injuries whilst at work	
Creating or contributing to unsanitary conditions	
Entering or leaving the organisation property except by designated entrances and exits	
Possession of offensive weapons	

Performance related issues for example, serious neglect of duty which undermines the organisation	
Failure over time to perform work to satisfactory standards	
Refusal to carry out a reasonable request of a manager	
Infringement of terms and conditions of service, for example absence from duty without permission of a line-manager	
Excessive infringement of flexitime/flexible working or regular excess of debit hours at the end of accounting periods	
Breach of the organisations written policies, examples include harassment and bullying, smocking in any other than designated smoking areas, and alcohol and drug use	

The Investigation

Disciplinary action will not be taken before an investigation has taken place.

The investigation will usually be carried out by the employee's supervisor or line-manager. The employee will be informed as soon as possible that an investigation is taking place and the date when the investigation will conclude. The investigation should take no longer than 10 working days.

There may be instances where an employee is suspended with pay while the investigation carried out.

Depending on the case it may be necessary for the employee to attend an investigatory interview. If such an interview is held, it will be made clear that the interview is part of the investigation process and separate from the disciplinary hearing.

The employee has the right to be accompanied to an investigation interview by their trade union rep or fellow work colleague.

Procedure

Once the investigation has concluded and the employee's line-manger believes that there are reasonable grounds that an employee committed an act of misconduct, the employee will be invited to attend a disciplinary hearing. The disciplinary hearing will take place within 10 working days of the conclusion of the investigation. The disciplinary hearing will be heard by a senior manager and the organisation will:

- give the employee in advance at least 5 working days notice of the hearing date, time and venue;
- explain that the disciplinary hearing will be conducted under this procedure;
- the letter will give a full explanation as to why the disciplinary hearing is taking place;

- the letter will state the employee’s right to be accompanied by their trade union rep or fellow work colleague;
- provide the employee all relevant information including statements the employer wishes to use as part of this process;
- Witnesses – the names of any witnesses being called by the employee must be made available to Human Resources no later than 2 working days prior to the hearing. It is the responsibility of the employee to organise their own witnesses and inform HR of any access requirements needed.
- The employee will be advised of the name of witnesses along with the chair / disciplinary panel within 2 working days of the hearing.

Attendance at hearing

The employee should take all reasonable steps to attend the hearing on the date / time stated in the employer’s letter. However, the hearing will be rescheduled to another time if their accompanying person is not available at the chosen time. In these cases the employee must propose another date within 5 working days of the original hearing date.

Where an employee fails to attend or remain throughout a scheduled hearing through circumstances beyond their control, the hearing or the continuation of the hearing should be arranged for another time (within 5 working days).

Employees may not be able attend a hearing due to ill health. In these circumstances the employee may be required to submit a medical certificate from their GP. The matter will also be referred to an Occupational Health Practitioner who with the employee’s consent will discuss the matter with the individual’s GP to access the length of time the employee is unable to attend hearings. If an employee does not give their consent, the Chair will have no option but to base any decision on whether to defer the hearing or proceed in the employee’s absence on the information available. Each case will be evaluated on its own merits but the prime objective is to minimise any delays in holding hearings.

If there is any additional evidence presented at the hearing the Chair may decide to adjourn a hearing and reconvene at a later date (within 5 working days of the original hearing date).

Stages of Disciplinary Action

The table below sets out the stages of disciplinary action within this procedure. In more serious cases of misconduct a stage may be passed over in favour of higher level disciplinary action:

Stage 1 – Oral Warning (recorded)	If an employee’s conduct or performance does not meet the required standards the employee will be given an oral warning, which will be recorded on their HR file for 6 months and then removed. The employee is advised at this stage that if their conduct or performance does not improve, the employer will move to the second stage of this disciplinary procedure.
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Stage 2 – First Written Warning	If the offence is a serious one, or following a review of stage 1 of this procedure there has been no improvement in conduct or performance, a written warning will be given to the employee. The warning will set out details of the complaint and the required improvement. This warning will be placed on the employee’s HR file for 9 months and then removed.
Stage 3 – Final Written Warning	A final written warning will be issued to an employee if there is still a failure to improve conduct or consistent poor performance or if the misconduct warrants a written warning but not dismissal. The written warning will have a full exploration of the complaint and will warn that continued misconduct or poor performance will result in dismissal. This final written warning will be placed on an employee’s file and removed after 12 months.
Stage 4 – Dismissal	If an employee’s performance or conduct continues to be unsatisfactory, then the employee will be dismissed. Only a senior manager can make the decision to dismiss an employee. The employee will receive full written confirmation of the decisions that have been taken and the date in which employment will terminate. The letter will also set out the employee’s right to appeal.
Stage 4 – Action Short of Dismissal	In serious cases where dismissal is considered but it is decided to impose disciplinary action other than dismissal (such as disciplinary transfer or disciplinary downgrading), it may also be decided to retain a final warning permanently on the employee’s personal record and the employee be advised that any recurrence will lead to dismissal. Such a warning will be subject to review, at not less than 12 month intervals, at the request of the employee.

The panel has the authority to (this list is not exhaustive and only gives an indication of what action might be taken – All alternative proposals must be approved by the Head of HR):

- Find that the employee has no case to answer to and discharge the case.
- Require satisfactory completion of a course of training or developmental activity.
- Issue a first written or final written warning and impose conditions in relation to such warnings.
- Extend the period of the final written warning as an alternative to dismissal.

- Demotion or loss of seniority in relation to the employee's current role.
- Dismiss the employee with the appropriate period of notice or payment in lieu of notice.
- Dismiss the employee without notice or payment in lieu of notice.

When deciding on the level of disciplinary action to take, the Chair and the panel should take into account any previous disciplinary warnings issued that are still current.

Decision and Written Notice

On the basis of the discussion and evidence provided the Chair / Panel will decide what action, if any, should be taken. The employee will normally be notified in writing within 7 working days of the conclusion of the hearing.

If a disciplinary warning has been issued the written notification will set out all the conditions associated with the warning, i.e. Reason for the warning, the improvement required, how monitoring will take place, the period for which the warning will be in force, the likely penalties for failure to meet conditions of the warning, and the employee's right to appeal.

Where disciplinary action is dismissal, the written notification will state the reason for the dismissal, the date on which their employment will terminate (taking into account the employee's required notice period if appropriate) and the employee's right to appeal.

Appeal

An employee can appeal against any disciplinary sanction imposed against him / her, with the exception of an informal oral warning.

The employee has the right to be accompanied to the disciplinary hearing by another employee, a recognised trade union representative or an official employed by the recognised trade union.

When lodging the appeal, an employee must state:

- The grounds of the appeal; and
- Whether he/she is appealing against the findings that he/she has committed the alleged act or acts of misconduct, or against the level of disciplinary sanction imposed.

The employee must submit a written appeal to the Head of HR within 5 working days of being informed of the disciplinary sanction being imposed against him / her.

Names of any witnesses to be called by the employee must be made available to Human Resources no later than 2 working days prior to the hearing. It is also the employee's responsibility to inform witness where the appeal is taking place and the time.

The appeal will be heard by a senior manager who has had not been involved in the decision to impose the disciplinary sanction on the employee. The senior manager is obliged to consider any representations made by the employee, trade union rep or trade union official and those of the manager who conducted the investigation and the manager who conducted the disciplinary hearing and imposed the disciplinary sanction.

The senior manager on hearing the appeal must make a judgement after reviewing all the evidence put forward from all parties, together with any further facts of evidence they may have come to light. The senior manager must make a decision whether to uphold the disciplinary sanction.

In the event that the senior manager finds for the employee, anything relating to the disciplinary sanction will be removed from the employee's record.

Appeal hearings will normally take place within 14 days of receipt of the employee's written notice of appeal.

The employee should take all reasonable steps to attend the appeal hearing on the date/time stated in the written notification. However, the hearing will be re-scheduled to another time convenient for the employee if the employee's accompany person is not available. The employee must propose an alternative date within 5 working days of the original date (this time limit may be extended only by mutual agreement).

Employees may not be able to attend a hearing due to ill health. In these circumstances the employee may be required to submit a medical certificate from their GP. The matter will also be referred to an Occupational Health Practitioner who with the employee's consent will discuss the matter with the individual's GP to access the length of time the employee is unable to attend the appeal hearing. If an employee does not give their consent, the Chair will have no option but to base any decision on whether to defer the appeal hearing or proceed in the employee's absence on the information available. Each case will be evaluated on its own merits but the prime objective is to minimise any delays in holding the appeal hearing.

Upon completion of the appeal, the senior manager will inform their decision to the employee. The decision will be confirmed in writing within 7 working days. The organisation's decision is final.

When an appeal lies against a dismissal by the panel, the panel's decision to dismiss will have had immediate effect and therefore, if the dismissal is by notice, the period of notice will have already commenced on the date the panel gave their decision. If the panel's decision was to dismiss the employee summarily without notice, the organisation will be under no obligation to reinstate or pay the employee for any period between the date of the original dismissal and the appeal decision and the original date of termination will stand.

In the event that the panel's decision to dismiss is overturned, the employee will be reinstated with immediate effect and he/she will be paid for any period between the date of the original dismissal and the successful appeal decision. An employee's continuous service will also not be affected.

Additional Information

8.1 Suspension

KEEN reserves the right to suspend or temporarily redeploy any employee who is suspected of serious misconduct, if it is considered in the interests of the individual and/or KEEN to do so. Suspension in these circumstances is for the purpose of allowing an unhindered investigation to take place, and does not constitute disciplinary action or sanction. Suspension will be for as short a

time as possible and will be on full pay. Any suspension should not be considered without advice from the HR Department.

If serious misconduct is not initially suspected or believed to have occurred, but during the course of an investigation the manager conducting it reasonably forms the opinion that a serious breach of discipline may have occurred, the employee who is the subject of the investigation may then be suspended.

An employee on suspension is paid their full basic pay although we reserve the right to suspend without pay if an employee is subject to a criminal investigation or is in potential breach of Health and Safety regulations.

Any decision to suspend will be confirmed in writing within five working days and such written confirmation will state that the nature of the suspension is precautionary, not disciplinary, pending the outcome of the investigation and any subsequent disciplinary proceedings.

8.2 Criminal Offences

If an employee is charged with, or convicted of a criminal offence this is not normally in itself reason for disciplinary action. Consideration needs to be given to what effect the charge or conviction has on the employee's suitability to do the job and their relationship with KEEN, colleagues, customers and suppliers.

Where allegations are made that may be of a criminal nature KEEN will co-operate fully with any police investigations. Where these issues are related to the potential conduct of an employee whilst overseas, employees should note that the legal jurisdiction of England and Wales does not cover overseas training events and competitions therefore will be subject to the legislation and legal proceedings of the country in which the offence occurred.

The criminal convictions listed below are deemed incompatible with employment with KEEN, and will result in dismissal:

- A custodial sentence of more than 6 months.
- Assault occasioning Actual or Grievance Bodily Harm.
- Sexual assault.
- Serious dishonesty, including fraud.
- Drug offences cover everything from possession to possession with an intent to supply
- Enlisted on the Sexual Offenders' Register.

8.3 Confidentiality

Employees should not discuss any disciplinary matter with employees other than the HR Department, Managers involved in the process and the employee's own companion. Failure to maintain confidentiality may result in further disciplinary action being taken.

8.4 Further Disciplinary Action

The outcome of a disciplinary hearing will remain confidential between the parties involved. Disclosure may be made in accordance with the Employer's legal, contractual or regulatory obligations. Where the employee is part of a UK Sport funded programme, KEEN is obliged¹ to inform the UK Sport Eligibility Sub-Committee of the outcome of the hearing. The Eligibility Sub-Committee will then determine whether that employee is eligible to remain part of a funded programme.

An employee subject to a disciplinary warning for any reason will be liable to further disciplinary action at the next stage of this procedure irrespective of the nature of the subsequent disciplinary offence.

8.5 Time Limits and Resignations

In cases where it is not practical to implement the procedure fully and expeditiously, for example in the absence of a key Manager, employees will be dealt with as closely as possible in accordance with this procedure.

Under normal circumstances the discipline process should be concluded in no more than 2 months: however, it is recognised that more complex cases could take up to 6 months. When any discipline process takes more than 20 working days, the manager conducting the process is to provide a written update to all parties at the 20 day point, and every 20 working days thereafter until it is concluded. A copy of the update is to be sent to the HR Department. Where the employee is part of a UK Sport funded programme, Hd of Sport Integrity at UK Sport is also to be included on the distribution.

When an employee - who is the subject of a disciplinary process - resigns before the process has been completed, the process will be completed using all the available evidence. The employee will be invited to attend any hearings (or appeal hearings) or submit further evidence if they choose, but will not be compelled to do so. A conclusion may be reached in their absence and KEEN will record the actions that it takes². The outcome shall be disclosed to UK Sport where the employee was part of a funded programme, for endorsement by the Eligibility Sub-Committee. It may also be disclosed to future prospective employers in the event that a reference request is received.

8.6 Note Taking & Records

KEEN has introduced a standardised methodology for recording all meeting notes, recording and retaining all evidence and actions taken during an investigation in an electronic format. Should an investigation lead to a criminal investigation (or be drawn upon as part of any HR appeal procedures), all material obtained in the course of an investigation should be considered relevant and be made available.

¹ s19.3 of the Grant Funding Agreement.

² This can include a ban from the NGB for a period of time and nullifying qualifications.

It is not the policy for KEEN to make an audio recording of any investigations or meetings. The Employee is not permitted to record disciplinary interviews, meetings or hearings without prior consent.

Interview and meeting notes will record the details of those present as well as the start and finish times of the discussion; however they do not need to be a verbatim recording of what had been said although they should ensure the clarity and essence of what was discussed.

The employee will be sent a copy of the interview or meeting notes produced, which will constitute the employer's record of proceedings.

All records detailing the nature of any sort of misconduct, the employee's defence or mitigation, the action taken and the reasons for it, whether an appeal was lodged, its outcome and any subsequent developments will be kept confidentially on the employee's file in the HR Department. Likewise, the Manager may also keep records relating to the ongoing management of the employee's performance, the implementation of corrective actions and progression of learning.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a stylized, cursive script.

Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Staff Grievance Policy

Both KEEN recognise that all employees should be treated fairly and with respect. If you feel you have been treated unfairly you should discuss this with your line-manager who will attempt to resolve the issue informally.

If informal attempts to resolve the matter do not work, it may be appropriate for you to raise a formal grievance under this procedure.

The purpose of this grievance procedure is to provide a formal mechanism to address such issues and bring about a satisfactory resolution in a fair and prompt manner.

A grievance may be brought by either a single individual or a group of people.

It should be noted that issues which are the subject of collective negotiation or consultation between **KEEN** will not be considered under the grievance policy unless it relates to a failure to engage in collective negotiation or consultation.

Grievances raised while you are subject to disciplinary proceedings will usually be heard only after the disciplinary process has been completed. Where the grievance and disciplinary cases are related it may be necessary to deal with both concurrently.

If you are unsure of how to proceed, advice can be sought from your trade union representative or Human Resources.

There are certain issues that will not be considered under the grievance procedure:

- Any complaints that are trivial – "He never says 'good morning' to me" for example
- Cases that are vexatious – For example a member of staff raises a grievance with their employer every few weeks. Each grievance is regarded as a relatively minor complaint that the employer has already provided a reasonable resolution to. It is clear that the employee is raising numerous grievances to inconvenience the employer.
- Cases that should be addressed by the disciplinary procedure
- Complaints relating to regarding / promotions (these may be dealt with under the appeals procedure)
- This does not apply to redundancy dismissals or the non-renewal of fixed-term contracts on their expiry.

Compliance with ACAS code of practice

This grievance procedure follows the ACAS code of practice on Disciplinary and Grievance Procedures (updated March 2015). The code is issued under section 199 of the Trade Union and Labour Relations (consolidation) Act 1992.

A failure to follow the code does not, in itself, make a person or organization liable to proceedings. However, employment tribunals will take the Code into account when considering relevant cases. Tribunals will also be able to adjust any awards made in relevant cases by up to 25 per cent for unreasonable failure to comply with any provision of the Code.

This means that if the tribunal feels that an employer has unreasonably failed to follow the guidance set out in the Code they can increase any award they have made by up to 25 per cent. Conversely, if they feel an employee has unreasonably failed to follow the guidance set out in the Code they can reduce any award they have made by up to 25 per cent.

Scope of Policy

The agreement applies to all staff who will be employed at **KEEN**

Procedure

Submission of Written Grievance

The member of staff must set out in writing the nature of his / her grievance, clearly stating the basis of the complaint. The grievance should then be submitted to your line-manager. If the grievance concerns your line-manager then the grievance should be submitted to the head of HR who will allocate the hearing of the grievance to another manager. It is advisable to seek advice and help from your trade union representative at this stage and to inform them of your intention to submit a written grievance.

Invitation to Grievance Hearing

Once the written grievance has been submitted, the manager to whom it is addressed must acknowledge in writing within 3 days receipt of the grievance and state that they are dealing with the grievance under this procedure and invite the member of staff to a grievance hearing in order to discuss the issues raised in the grievance.

The letter (see sample letter 1) should state the date, time and location of the meeting and the composition of the panel who will hear the case. This letter should make clear that the member of staff has the right to be accompanied by a fellow worker, a trade union representative or an official employed by the trade union.

Procedure

The hearing should take place as soon as is reasonably possible, within 15 working days after the grievance has been received. If the hearing cannot take place within 15 working days, the member of staff that has raised the grievance should be given an explanation for the delay in writing with a new date for the hearing. For the purposes of this procedure a working day equates to Monday – Friday and excludes public holidays and any statutory closure days.

The Employer may find it necessary to conduct an investigation before the grievance hearing and this may affect the date of the hearing.

The Complainant

Whether the grievance is an individual or group grievance, all parties will be provided with relevant paperwork from the employer 3 days prior to the hearing. All parties should provide to the employer any paperwork they wish to rely on within 5 days of the hearing.

If the grievance concerns another member of staff, they will be invited to the hearing to discuss the issues raised in the grievance. It may be appropriate in some cases to meet with both parties separately to discuss the complaint.

All parties are entitled to be accompanied to the grievance hearing by a fellow employee, trade union representative or an official employed by the union. The accompanying person is not entitled to answer questions on behalf of the member of staff they are accompanying. HR should be notified of the name, address, job role and any special requirements of the accompanying person at least two working days before the hearing.

The member of staff who has had the grievance brought against them has the right to submit a written submission prior to the hearing. This submission will be circulated to the panel and all parties involved. The written submission must be received by HR at least 5 working days before the hearing.

If necessary both parties can call witnesses to provide evidence. Names of witnesses and any special requirements must be provided to HR at least 5 working days before the hearing. It is up to the member of staff calling the witness that they are informed of the date, time and location of the hearing. Names of all witnesses will be made available to all parties.

Both parties should take all reasonable steps to attend the hearing. If for any genuine reason (i.e. illness) either party or their accompanying person cannot attend, an alternative date for the hearing will be arranged. This should be within five working days of the original hearing date.

Where a member of staff fails to attend a re-arranged meeting without a good reason a decision will be taken in their absence based on the evidence provided.

Panel

The panel will normally consist of the complaint's appropriate line-manager, a manager who has had no involvement with the grievance and a representative from HR.

Decision

Following the meeting the panel must decide on what action, if any, to take. Decisions must be communicated to the employee in writing, and where appropriate set out what action the employer intends to take to resolve the grievance. This should happen without unreasonable delay and within 5 days. The employee should be made aware at this stage that if they are unhappy with the outcome they can appeal. It is at this point in the procedure where a grievance may be referred to the disciplinary procedure by the panel.

Appeals Procedure

Where an employee feels that their grievance has not been satisfactorily resolved they can appeal the decision. The appeal should be made in writing to HR within 10 working days of the written decision being received by the employee. The appeal should set out the reasons why the employee is not satisfied with the decision taken by the panel. The member of staff will then be invited to a meeting in order that the appeal can be discussed.

The appeal should be heard without delay (normally within 10 working days) and should be dealt with impartiality by managers who have not previously been involved in the case and have no

conflict of interest, along with a representative from HR. The panel members will be provided with all the material presented at the original hearing.

Workers have the statutory right to be accompanied in the appeal hearing by a fellow worker, trade union representative or full-time trade union official. HR should be notified within 5 working days of the appeal hearing the name, address, job role and any special requirements of the accompanying person, along with any witnesses they wish to call to the appeal hearing. It is up to the complainant to inform witnesses and anyone accompanying them the date, time and venue for the appeal hearing.

Appeal Decision

The outcome of the appeal should be communicated to the employee in writing without unreasonable delay and within 5 working days.

The decision taken by the appeal panel will be final.

Sample Letters

Letter 1 – Invite to Grievance Hearing

Name / Address
Contact Tel Num
Email

Date
Strictly Personal and Confidential

Dear [Name]

Grievance Hearing

I am writing to request you attend a grievance hearing in accordance with KEEN grievance procedure (copy enclosed).

The hearing will take place on [day, date] at [time] in [venue].

Depending on the evidence provided at the hearing, the outcome could be that the grievance is referred to the disciplinary procedure.

The hearing will give you an opportunity to set out the details of your complaint [write what the complaint is] as outlined in the enclosed paperwork. [Include copy of written grievance letter].

The grievance panel will comprise of [name], who will chair the meeting along with [insert other names].

[Name of HR representative] will also be in attendance, therefore if you have any queries about the hearing please contact them at least 2 working days prior to the hearing.

You are entitled to be accompanied to the hearing by a fellow employee, a Trade Union Representative or a full-time Trade Union Official.

You may provide written evidence to support your case. This should be submitted to Human Resources at least 5 working days prior to the hearing, together with the name, address and job title of the person accompanying you and if relevant the names of any witnesses you wish to call. Please ensure that you inform any witnesses the date, time and venue of the hearing.

We will provide you with all the paperwork and information that will be made available to the panel members within 3 days of the hearing.

I would be grateful if you would contact me by [date] to confirm your attendance.

Yours sincerely

[Name]

Letter 2 – Outcome of Grievance Hearing

Name / Address
Contact Tel Num
Email

Date

Strictly Personal and Confidential

Dear [Name]

Outcome of Grievance Hearing

Further to grievance hearing conducted on [date, time of hearing], I write to confirm the decision of the grievance panel.

After looking at the evidence provided the panel's decision was [state decision and recommendations].

Or

After looking at the evidence provided the panel took the decision that this is a matter that should be referred to the Disciplinary Procedure.

You have the right to appeal against the decision of the grievance panel by lodging a written appeal with Human Recourses by [date]. Full details of the appeals procedure are contained within the Grievance Procedure (copy enclosed).

If you have any queries do not hesitate to contact me.

Yours sincerely

[Name]

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a stylized, cursive script.

Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Trustee and Employee Policy and Procedure on Conflicts of Interests

The Charity Commission confirms that a trustee has a legal obligation to: “Act responsibly and **only** in the interests of the charity. This means that the trustee must not act to the detriment of KEEN.”

KEEN aims to ensure that any conflicts of interest are properly recorded and openly managed. As a result, it is the policy of KEEN that all trustees and full time employees declare any conflicts of interest that they may have as soon as they arise. It is also good practice for all part-time employees to abide by the same general principles and to register potential conflicts.

What is a conflict of interest?

A conflict of interest includes but is not limited to:

- Making decisions or undertaking actions which might benefit another organisation offering the **same or similar** services, which includes, but is not limited to:
 - Paid or unpaid employment or self-employment (including partnerships) by an organisation offering similar services to KEEN.
 - Activities to undertake fundraising or to seek financial or other benefits for a third party for similar activities to those provided by KEEN.
 - Activities to recruit Participants, Participants or Team Members in preference to KEEN.
- Actions of KEEN which may benefit them personally, including particularly any financial benefit
 - Personal benefit also includes benefit to a Participant of their family.

A conflict should be declared to the Chair either when the conflict first arises, or when it is first recognised that a conflict might be perceived, by using the Conflict of Interest Statement below. A potential conflict should be identified at the earliest possible opportunity.

Actions to take in case of a Trustee or Employee (the Affected Person) having conflict of interest:

1. The Affected Person must complete the Conflict of Interest Statement (CIS) template provided below
2. The Affected Person must send the completed CIS form to the Chair of Trustees.
3. The Chair will then make other trustees aware of the conflict and will administrate a discussion between trustees of what should be done
 - a. The Chair may also discuss the conflict with other external advisors of KEEN if they deem it appropriate
 - b. The discussion need not be in person, and can take the form of individual trustees emailing their opinions on the matter and any potential action to the Chair.
 - i. Trustees should only respond to the Chair, not to the group at large.

4. If a majority of trustees agree that there is a conflict, the Chair will inform the Affected Person of the position and issue a Conflict Management Form (below) and invite the affected Trustee to complete the form.
5. The Chair will arrange a meeting with the Affected Person to review the conflict management plan and agree on the way forward.
 - a. The conflict may be managed in a number of ways:
 - i. Its existence recorded but no further action taken;
 - ii. The Person may not be able to take part in discussions or activities involving matters in which he/she may appear to have a conflict;
 - iii. The Person may not take part in a decision on matters in which he/she appears to have a conflict;
 - iv. Where the conflict is financial, the Persons may be required to change or sell his or her investments to participate
 - v. As a last resort, the Person may be required to resign as from KEEN
6. Once agreed, the conflict management plan will be signed by the affected Trustee and the Chair of Trustees.

What conflicts should be declared? What should a trustee or employee do if they are unsure whether to declare a matter?

If a trustee or employee is unclear whether something may give rise to a potential conflict of interest, they must contact the Chair of trustees for guidance and always err on the side of caution.

As a general guide they should ask themselves “Are there any circumstances in which my interest could cause material impacts on the operation and success of KEEN now or in the future or will lead to embarrassment or damage the reputation of the KEEN?” If the answer is in the affirmative to any of these then they should declare the matter.

“Family Participants”

For the purpose of the CIS a person is treated as a Participant of your family if he or she lives within a trustee’s household or is a close relative (i.e. spouse, parents, siblings, child, grandchild, or a relation in law).

Failure to declare an interest

Failure to declare a conflict of interest is contrary to the legal obligation placed on trustees and as a result may lead to the trustee or full-time employee being asked to stand down as a KEEN trustee. Situations involving part-time employees will be dealt with on a case-by-case basis, at the discretion of the Executive Director. .

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

A handwritten signature in black ink, appearing to read 'Jim McMahon', with a stylized, cursive script.

Signed: Jim McMahon, Chair of Trustees
Date: 29th January 2019



Conflict of Interest Statement

Trustee or Employee: Please complete this Conflict of Interests Statement and hand it to the Chair of trustees as soon as a conflict of interest arises or is suspected.

Chair of trustees: Please make sure that other trustees are made aware of this conflict (or potential conflict) and that a quorum of trustees decides on what the response should be.

Name:	
Date:	
What is the issue that you are raising?	
What do you consider to be the conflict of interest?	

Signed:

Conflict Management Form

(please expand the rows/boxes as necessary)

1. Name and position of the person making the declaration	
2. Date of the initial declaration	
3. Name and position of the person to whom the declaration is being made	

Issue/Question	
4. Brief Description of the Conflict of Interest (Col) or potential Col	
5. What decisions or interests of KEEN might be or be seen to be affected by the Col/potential Col?	
6. What actions might be taken to manage or avoid the conflict?	

Following discussions

Issue/Question	
7. Describe here the course of action agreed	
8. Which individuals, groups or organisations need to be informed about the Col and the course of action agreed?	
9. Who will inform them, how and when?	
1. Do you wish to review the situation and this plan at some point in the future? (If so, agree and note when and who will initiate that review/further discussion)	

Sign off by the relevant parties as appropriate

KEEN Bribery, Gifts and Hospitality Policy

Bribery

Introduction to KEEN's approach

This policy applies to all persons working for us or on our behalf in any capacity, including employees, Trustees, Team Members, the KEEN supervisory staff, the Administrator and business partners. It is our policy to run KEEN in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships. Any KEEN employee, Team Member or Trustee who breaches this policy will face disciplinary action, which (in the case of employees) could result in dismissal for gross misconduct. Any non-employee who breaches this policy may be required to resign his or her position with immediate effect.

What is bribery?

According to the Ministry of Justice's Quick start guide on The Bribery Act 2010, bribery is very generally defined as "giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. So this could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process."

Examples of what constitutes a bribe[1]

Bribes can take on many different shapes and forms, but typically they involve corrupt intent.

There will usually be a 'quid pro quo' – both parties will benefit. A bribe could be the:

- direct or indirect promise, offering, authorisation or acceptance of anything of value
- offer or receipt of any kickback, loan, fee, reward or other advantage
- giving or receiving of aid, donations or voting designed to exert improper influence.[2]

What to do if asked for a bribe

All those covered by this policy have a responsibility to help detect, prevent and report instances not only of bribery, but also of any other suspicious activity and wrongdoing. All initial concerns will be treated confidentially. However, as an investigation progresses it may not always be possible to fully protect the names of those raising concerns. Where this is a concern then the situation will be discussed with the people concerned before any action is taken.

It is very important to the charity that any concerns about abuse of this policy are raised. Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage to an appropriate employee of the charity, either a line manager, the Director of People, Finance and Business Solutions (or in her absence the Deputy Director of Finance), or by following the charity's Whistleblowing procedure.

Victimising an employee for raising a legitimate concern will be a disciplinary offence as will maliciously or vexatiously raising a concern.

Communication and Training

KEEN seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training, that is proportionate to the risks it faces[5]

We will communicate this policy and relevant guidance to staff across the charity. Wherever possible we will also communicate this policy to our partners, contractors, suppliers and wider stakeholders. All employees will be expected to take responsibility for ensuring that any consultants, partners or anyone else acting on our behalf are made aware of this policy and our zero-tolerance approach to bribery and corruption.

Monitoring and reviewing our policy

KEEN monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.

Gifts and Hospitality

This policy does not prohibit acceptable and appropriate hospitality (given or received) to or from third parties.

It is not acceptable for you (or someone on your behalf) to:

give, promise to give, or offer, a payment, gift or hospitality with the expectation that a business advantage will be received, or to reward a business advantage already given

- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- threaten or retaliate against another working on our behalf who has refused to commit a bribery offence or who has raised concerns under this policy, or
- engage in any activity that might lead to a breach of this policy.

[1] Bond (the UK Participantship body for NGOs working in international development) *Anti-Bribery Principles and Guidance for NGOs, as endorsed by the Charity Commission Chapter 3 Fraud and Financial Crime Guidelines*, p.55

[2] S1(4) *National Deaf Children Society Anti-Bribery Guidelines*

[3] Bond (the UK Participantship body for NGOs working in international development) Anti-Bribery Principles and Guidance for NGOs, section 6

[4] Structure recommended by Charity Commission Chapter 3 Fraud and Financial Crime Guidelines, p.57

[5] Charity Commission Chapter 3 Fraud and Financial Crime Guidelines, p.57

[6] Bond (the UK Participantship body for NGOs working in international development) Anti-Bribery Principles and Guidance for NGOs

[7] Transparency International - Anti-Bribery Principles for Not-for-profit Organisations, p.16

Review of Policy

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Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Money Laundering Policy

Money laundering is the term used for a number of offences involving the proceeds of crime or terrorist funds. It includes possessing, or in any way dealing with, or concealing, the proceeds of any crime.

The process of money laundering has three stages:

- **placement**, through which the funds (often in cash) enter the financial systems;
- **layering**, by which the funds pass through a complex sequence of transactions designed to make it impossible for investigators to follow a trail of evidence back to the origin of the funds; and
- **integration**, the point at which the funds emerge from the process back into the legitimate economy in a way that they are unrecognisable as the proceeds of crime.

Charities, such as KEEN can be particularly susceptible to the attentions of potential money launderers.

This policy is necessary in order to comply with the Money Laundering Regulations, 2017 and Proceeds of Crime Act 2002 which require processes to be put in place to avoid the possibility of money laundering.

KEEN is committed to ensuring that all necessary safeguards are in place with regards to the receipt of money by the Charity in order to avoid the Charity being used to launder money that may originate from the proceeds of crime.

Current legislation places three obligations on all persons:

- not to assist in the money laundering process by acquiring, concealing, disguising, retaining or using the proceeds of crime
- not to prejudice an investigation
- not to contact any person who has been suspected of, and reported for, possible money laundering in such a way as to make them aware of the suspicion or report (“tipping off”)
- The law requires all cases of suspicion to be reported, regardless of size.

It is a legal requirement to appoint a Money Laundering Reporting Officer (‘MLRO’) to be responsible in law for receiving suspicion reports in an organisation and for passing these on to the National Crime Investigation Service (NCIS). The Charity's Designated Money Laundering Officer is the Executive Director.

If any Participant of staff knows or suspects that money laundering is taking place, they must report it to the MLRO as soon as the knowledge or suspicion first strikes them. Any delay leaves them open to two charges; failure to report, and of assisting an offence. There is no need for them to ascertain the nature of the crime which leads them to suspect that the unusual transaction may be an instance of money laundering. However, they must be able to explain what made them suspicious. The report should always be made immediately to the MLRO, even if later knowledge proves the suspicion to be unfounded.

During their period of induction the KEEN supervisory staff must familiarise themselves with the current Money Laundering Regulations and ensure that KEEN is compliant with them.

Review of Policy

We are committed to reviewing our policies, procedures, and guidance **annually**. This policy was last reviewed on: **29th January 2019**.

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Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019

KEEN Whistleblowing Policy

Introduction

Under certain circumstances, employees have legal protection if they make disclosures about organisations for whom they work.

The Public Interest Disclosure Act 1998 prevents you from suffering a detriment or having your contract terminated for 'whistle blowing' and we take very seriously any concerns which you may raise under this legislation.

We therefore encourage employees to be alert to wrongdoing and to inform management of any concerns. Employees should raise an issue when they are just concerned, rather than wait for proof or investigate the matter themselves.

This policy gives some information about whistle blowing to assist employees in deciding whether any proposed action would be protected under the whistle blowing legislation and sets out the procedure to follow if employees reasonably believe that they have identified such malpractice.

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

Background information

The legislation applies to workers who follow the procedures laid down in the legislation (see below) in disclosing specific categories of malpractice relating to one or more of the following actions:

- Financial malpractice or impropriety or fraud
- A criminal offence
- A failure to comply with a legal obligation
- A miscarriage of justice
- The endangerment of an individual's health and safety
- Damage to the environment
- Deliberate concealment of information relating to any of the above.

Are you protected under the whistle blowing legislation?

In order to benefit from the protection of the legislation, the whistleblower has to satisfy certain conditions.

- Disclosure to the employer will be protected, provided that it is made in good faith and the whistleblower has a reasonable suspicion that the alleged malpractice has occurred, is occurring, or is likely to occur.

- Disclosure to a regulator (eg Health and Safety Executive, Environment Agency, Charity Commission) will be protected where, in addition, the whistleblower honestly and reasonably believes that the information and any allegation in it are substantially true.
- Disclosure to other bodies is protected if, in addition to the tests for regulatory disclosures, it is reasonable in all the circumstances and is not made for personal gain.

Procedures for making a disclosure

Employees should inform their line manager immediately if they become aware that any of the specified actions is happening (or has happened, or is likely to happen).

If the allegation is about the actions of their line manager, the employee should raise the issue with the Executive Director* or, if s/he is their line manager, a Trustee. Complaints against the Chair should be passed to the Executive Director, who will nominate an appropriate investigating officer.

The complainant has the right to bypass the line management structure and take their complaint direct to the Chair. The Chair has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

If there is evidence of criminal activity then the investigating officer should inform the police. KEEN will ensure that any internal investigation does not hinder a formal police investigation.

Whistleblowers can ask for their concerns to be treated in confidence and this will be respected so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Employees will not be penalised for informing management about any of the specified actions and will be protected from reprisals.

We encourage you to use the procedure if you are concerned about any wrongdoing at work. If you make an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against you. In making a disclosure you should exercise due care to ensure the accuracy of the information. However, if the procedure has not been invoked in good faith (e.g. for malicious reasons or in pursuit of a personal grudge), then it will make you liable to disciplinary action up to and including dismissal as may be appropriate in the circumstances.

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the organisation. In exercising this discretion, the factors to be taken into account will include:

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

Timescales

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

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

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

Investigating procedure

The investigating officer should follow these steps:

1. Full details and clarifications of the complaint should be obtained.
2. The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
3. The investigating officer should consider the involvement of the Police at this stage and should consult with the Chair.
4. The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
5. A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Chair as appropriate.
6. The Chair will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Organisation procedures.
7. The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
8. If appropriate, a copy of the outcomes will be passed to the Trustee Board to enable a review of the procedures.

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

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome, the Organisation recognises the lawful rights of employees and ex-employees to make disclosures to an appropriate organisation or body (such as the Health and Safety Executive, the Police, or regulators), or, where justified, elsewhere.

If you do not report your concerns to KEEN management or Chair you may take them direct to the appropriate organisation or body.

This policy is to be read in conjunction with the following policies:

- Conflict of Interest
- Complaints
- Confidentiality

* The Designated Person would normally be the most senior paid staff member or nominated Trustee.

In all instances, if appropriate a concern can be raised with our designated Trustee Lucy Wawrzyniak directly on whistleblowing@keenoxford.org.

Review of Policy

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Signed: Jim McMahon, Chair of Trustees

Date: 29th January 2019