

Oundle Mencap Holidays LTD.

Handbook

Oundle Mencap Holidays LTD is a registered charity that runs annual residential holidays for children and young adults with learning disabilities. The holidays are staffed by volunteers and are reliant on charitable funding for their continued existence.

For further information email oundlemencapholidays@gmail.com

or call 07801 187103

www.oundlemencap.co.uk



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1. Terminology and abbreviations

Adult – individual aged 18 years or older. Our *Camps* are for adult holiday makers only.

Camp – a holiday for adults with learning disabilities which may sometimes involve camping in tents or accommodation in a youth hotel or similar premises. These normally last 2 - 4 nights.

Child – for brevity this term is used to encompass both children and adolescents up to the age of 19 years. This is the full age range catered for by our holidays for children.

Helper – an able young person or adult who volunteers on one of our holidays. Helpers can be categorised more specifically according to their level of experience and more information on this is provided in section 9. Also referred to as *volunteers* or *staff*.

Holiday – normally refers to a holiday for children (including adolescents). These usually take place in a permanent building and last 7 nights.

Holiday maker – an individual with a learning (and sometimes physical) disability, of any age, who attends one of our holidays.

Learning disabilities – this term is used to refer to developmental delays, reduced intellectual ability and difficulties in everyday living skills. These may result from a genetic, neurological or neurodevelopmental disorder such as Down syndrome, cerebral palsy, or autism.

NMS – the national minimum standards for Residential Holidays for Disabled Children, published by the Department for Education.

Original holiday – the summer holiday hosted at Oundle School which was the first holiday run by OMH, and for many years the only one. As described in section 2 below, this holiday provides the template, or reference point, for all others.

OMH – Oundle Mencap Holidays, the provider of all holiday schemes described in this document. Also referred to as *the organisation* and *the charity*.

2. About this document

This document complements the OMH *Statement of Purpose*, in which the goals of OMH are stated, the organisation's history and structure are defined, and brief overviews of key policy areas are given.

Here we collected all current policy documents. Each policy is reviewed annually and many have space for individual details to be added (e.g. the name of the current Protection Officer). Individual copies of the latest versions of every policy document are available at each holiday site, as well as various associated documents such as reporting forms, best practice guides and so on. Please consult these (holiday leaders can help you find them) if you wish to ascertain the details of the latest policies.

Other key documents which underpin the work of OMH are our Memorandum and Articles of Association and our Operations Manual, both of which are also available online / on request.

For many years OMH operated a single holiday annually in Oundle, Northamptonshire. All of our policies and procedures, and our other holidays, evolved from this model. Therefore in each section of this document we often first describe the way in which this original holiday operates and subsequently flag any ways in which our other holidays deviate from this model.

This handbook is designed to provide a written record of the policies and procedures of OMH for reference by staff and oversight bodies. We would always advise that anyone who really wants to see best practice in action, rather than policies on paper, arranges to visit one of our holidays.



3. Key Contacts

This section gives details for some of the key people from an outside point of view. There are dozens more who give their time and energy to make the organisation, and the holidays, what they are. However, these are the ones you might want to get in touch with if you're new to OMH and want to know more about what we do:

Parents and Holiday-Makers:

If you want to come on one of our holidays, contact Kate Taylor, the registered manager on 07801 187 103 or by emailing kate@oundlemencap.co.uk

Donors or Fundraisers:

If you'd like to support OMH by making a donation, organizing a fundraising activity or donating in kind, contact Tessa Stanley-Price on 07764 577 530 or by emailing tessa@oundlemencap.co.uk

Volunteers:

If you'd like to take part in one of our holidays as a volunteer, contact Amelia Barker on 07925 225465 or by emailing millie@oundlemencap.co.uk.

Other enquiries:

If you want to ask any general questions or you don't think you fit in to the categories above, contact Anna Clish on 07525 331872 or by emailing oundlemencapholidays@gmail.com

Please bear in mind that all of these people volunteer their time to OMH and so we would ask that you be patient if you don't get a response right away.

4. Mission Statement

The goal of Oundle Mencap Holidays (OMH) is to provide excellent holiday schemes for children and young people with learning (and sometimes also physical) disabilities. At a minimum, the people in our care should be:

- Safe
- Happy
- Respected
- Given new opportunities

In particular, we aim to achieve a convivial environment in which holiday makers feel surrounded by peers and friends.

The focus of our organisation is not just on the children and young adults who attend our holiday schemes. We also aim to have an impact on three groups of individuals, as described below.

Families and friends of holiday makers:

- by offering respite that they can rely on year after year
- by offering high quality care at an affordable rate
- by tailoring care to the individual needs (communication, activity, physical, medical, dietary) and preferences of their son or daughter

Volunteers

- by breaking down their assumptions about people with additional support needs



- by teaching kindness, patience and acceptance as well as imparting valuable employment skills
- by providing a framework in which to give back to society while maintaining a demanding career / education experience

Members of the public

- by challenging perceptions of the capabilities of both people with disabilities and our young volunteers
- by providing a model of what an engaged, dedicated volunteer team can achieve.

In order to achieve these goals, while meeting the highest standards in the care of and experience of holiday makers, our holidays are structured around a large and reliable volunteer body. The recruitment of our volunteers and their well-being while contributing to the scheme (and as they move on) is therefore paramount to our success and longevity.

OMH is connected with four other organisations who support our work:

1. Mencap is a national charity which supports people with a learning disability to live their lives as they choose. We are affiliated to Mencap as one of their Local Groups. Mencap provides us with a number of services including: guidance on best practice; access to a specialist insurance scheme; oversight of our activities; and support for our CRB checking process. For more information about Mencap go to www.mencap.org.uk
2. Oundle School is an independent co-ed boarding school in Oundle, Northamptonshire. The school provides a venue for our main summer holiday, which runs for a week normally overlapping July and August. The large majority of our volunteers are also drawn from among the pupils at the School. For more information about the school go to www.oundleschool.org.uk
3. St John's School is an independent co-educational boarding school in Leatherhead, Surrey. The school provides a venue for an additional summer holiday, which runs for a week in August. The large majority of the volunteers on the relevant children's holiday are drawn from among the pupils at the school.
4. The Oundle Guides Company are kind enough to share their camping equipment with us for the Mencap Outdoors holiday for young adults.
5. Green Frog Holidays is a charity set up by present and former OMH volunteers work with and enable host schools that have the desire and infrastructure to provide a one-week residential holiday during the summer for local children and young people with learning disabilities.

The principal governing document of OMH is our Memorandum and Articles of Association which layout our over-arching aims as an affiliate of Mencap. For a copy please email oundlemencapholidays@gmail.com In addition, more about our management structure can be found in the Governance policy included in this handbook.

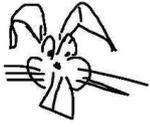


5. About our Policies

Policies are listed in alphabetical order divided into two categories. Organisational Policies refer to policies and procedures which operate year-round, at the level of the registered charity which is OMH. Holiday Policies refer to policies and procedures which are only relevant during the operation of a holiday.

Individual policy documents are reviewed annually and updated as necessary. Each separate policy document usually contains a policy statement and then procedural details. There may also be sections to name key individuals responsible for the application of that procedure, definitions of terms used, and reference made to operational documents (e.g. recording forms, best practice guidelines) for enactment of procedure day to day.

Policy documents contain a statement referring to the date of their last update, check, and a statement of applicability (e.g. to one or more of the holidays operated by OMH). We also record how the policy links to relevant guidelines and regulations such as the *National Minimum Standards*. In this handbook, all policies were checked and updated not before December 2014 and are subject to regular review by the OMH Board of Trustees.



Organisational Policies



Complaints Procedure

Policy Statement

Everyone has a right to express their views or complain about a service provided by Oundle Mencap Holidays. By inviting comments and encouraging feedback, OMH aims to ensure that its services are continually reviewed and meet the needs of users.

Not all concerns are complaints. A concern is an issue raised by a volunteer, holiday maker, parent or other person that is resolved quickly and informally. Most concerns are resolved by the person to whom the concern is addressed e.g. the volunteer, or (more probably) their group leader or a nearby senior helper. Every effort should be made to allay concerns at this level and with the least possible formality. The ideal is that no concern should ever become a formal complaint.

Occasionally, however, a concern will be too serious to be handled in this way, perhaps needing greater investigation; or the person concerned may not feel that the answers given so far have been acceptable or adequate. In such circumstances the concern may become a complaint and this document outlines the formal procedure that should be followed in such cases. OMH will inform HMCI about all formal complaints.

General Principles:

- this procedure is intended to guide you in raising a concern or complaint relating to OMH, or the services that it provides.
- an anonymous concern or complaint will not be investigated under this procedure, unless there are exceptional circumstances.
- to allow for a proper investigation, concerns or complaints should be brought to the attention of the organisation as soon as possible. In general, any matter not raised within a reasonable time frame after the event being complained of, may not be considered under this policy.

Procedure, Stage 1, Informal

If a complaint arises, complainants should refer details of their concern to the registered manager, Kate Taylor, either in person or by writing to:

The Registered Manager, Oundle Mencap Holidays, 58 Glaphorn Road, Oundle, PE8 4PT

Or by email to: kateosmh@hotmail.co.uk

If a complaint is made in person or by telephone, the recipient should attempt to make a record the details and have a witness to note the nature of the complaint and their holding response. The recipient should encourage the complainant, if their complaint is serious or insistent, to put their comments in writing.

Many concerns can be resolved by simple clarification or the provision of information and it is anticipated that most complaints will be resolved by this informal stage. In these cases every effort should be made to resolve the situation informally. Any unreasonable refusal to attempt an informal resolution may result in the procedure being terminated forthwith.

The registered manager will address the complaint to the best of their ability, within thirty days of receiving the complaint.

If a complaint arises regarding the registered manager, details of their concern should be referred to the independent trustee either in person or in writing to:

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Last updated 24.07.2022

Relevant to: all OMH activities



Jo Floto, Oundle Mencap Holidays, 14 Highfield Avenue, Cambridge. CB4 2AL

Or by email to: jo.floto@gmail.com

Procedure, Stage 2, Formal

If the matter is not resolved satisfactorily within the informal procedure described above, the matter should be referred to the OMH Chairman in writing:

Robin Banerjee, Oundle Mencap Holidays, Kirkeby House, Pavillion Drive, Oundle, PE8 4JJ

The complainant should include details which might assist the investigation, such as names of potential witnesses, dates and times of events, and copies of relevant documents.

Where the Chairman receives such a formal complaint, it should be acknowledged and a commitment made that the complaint will be investigated and the outcome of the investigation notified to the complainant in due course.

It is essential that there is a clear understanding of the complaint. The Chairman will collect such evidence as is deemed necessary. Where necessary, the Chairman may meet with the complainant to clarify the complaint, the complainant may wish to be accompanied by a friend at this meeting. It might also be possible for the complaint to be resolved at this time. The Chairman will further discuss the matter confidentially at an extraordinary meeting of the Trustees.

The investigation will begin as soon as possible and when it has been concluded, the complainant, and the OMH staff concerned, will be informed in writing of the outcome. This may be to the effect that:

- There is insufficient evidence to reach a conclusion, so the complaint cannot be upheld
- The concern is not substantiated by the evidence
- The concern was substantiated in part or in full. Some details may then be given of action the organisation may be taking to review procedures etc. but details of the investigation or of any disciplinary procedures will not be released
- The matter has been fully investigated and that appropriate procedures are being followed, which are strictly confidential (e.g. where disciplinary procedures are being followed).

The complainant will be told that consideration of their complaint by the Chairman is now concluded.

If the complainant is not satisfied with the manner in which the process has been followed, they may forward the details of their complaint and the OMH response to:

HMCI, Ofsted National Business Unit, Piccadilly Gate, Store Street, Manchester, M1 2WD

Tel: 0300 123 1231

Email: enquiries@ofsted.gov.uk

A note on complaints by holiday makers

OMH acknowledges that children and young people who attend our holiday schemes also have the right to make a complaint, but may lack the communication or other skills needed to do so as proposed in this policy document. The organisation adopts a number of principles and strategies to provide opportunities for such individuals to raise concerns and have these rightfully addressed. These include:

- institutionally embedded beliefs in the rights of children and of all individuals with



disabilities

- creation of a communal environment in which all opinions are respected and valued
- support for communication, including feedback to holiday makers at a suitable level for their understanding
- close monitoring of holiday makers for signs of dissatisfaction or upset
- involvement of holiday makers in making choices: support to try new things without pressure to do so if that is clearly against the wishes of the individual
- detailed recording of preferences and experiences on an active and effectively-shared personal care plan for each holiday maker
- encouragement for all holiday makers to be active participants in their holiday experience.

NB: In the event that a complaint raises a child protection issue or protection of vulnerable adults issue, this policy should be followed in conjunction with the OMH Safeguarding policy.



Data Storage Policy

OMH is committed to the safe and secure storage of records where these are necessary for the running of our holiday schemes. We keep records in order to meet our legal and social obligations and to support best practice in all our activities. We are likewise committed to the safe disposal of records once these are no longer useful and aim in particular not to retain personal data where this is not absolutely necessary.

The accidental or intentional destruction of these records during their specified retention periods could result in the following consequences for OMH and/or its representatives:

- fines and penalties;
- loss of rights;
- obstruction of justice charges;
- contempt of court charges; and
- serious disadvantages in litigation.

OMH must retain certain records because they contain information that:

- serves as the OMH's corporate memory;
- has enduring informational value (for example, it provides a record of a business transaction, evidences OMH's rights or obligations, protects OMH's legal interests or ensures operational continuity); and
- must be kept to satisfy legal, accounting, or other regulatory requirements.

OMH prohibits the inappropriate destruction of any records, files, documents, and other forms of information. This policy is part of a charity-wide system for the review, retention, and destruction of records OMH creates or receives in connection with the business it conducts.

Data collected and stored by OMH

OMH collects and stores a number of documents containing personal or sensitive information. These can be split into information about volunteers, information about holiday makers, management records and donor records. These documents may exist in electronic and/or paper form.

Types of documents

This policy explains the differences among records, disposable information, and confidential information belonging to others.

Records

A record is any type of information created, received, or transmitted in the transaction of OMH's business, regardless of physical format. Examples of where the various types of information are located include:

- appointment books and calendars;
- audio and video recordings;
- contracts;
- electronic files;
- e-mails;
- handwritten notes;
- invoices;



- letters and other correspondence;
- memory in mobile phones; and
- online postings, such as on Facebook, Twitter, Instagram, Snapchat and other social media platforms and websites.

Therefore, any paper records and electronic files that are part of any of the categories listed in the Records Retention Schedule contained in the Appendix to this policy, must be retained for the amount of time indicated in the Records Retention Schedule. A record must not be retained beyond the period indicated in the Record Retention Schedule, unless a valid business reason (or a court order or other special situation) calls for its continued retention. If you are unsure whether to retain a certain record, contact the leadership team of the charity.

Disposable information

Disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a record as defined by this policy. Examples may include:

- duplicates of originals that have not been annotated;
- preliminary drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant steps or decisions in the preparation of an official record;
- books, manuals, training binders, and other printed materials obtained from sources outside of OMH and retained primarily for reference purposes; and
- spam and junk mail.

Confidential information belonging to others

Any confidential information that an OMH representative may have obtained from a source outside of OMH, such as employer references, must not, so long as such information remains confidential, be disclosed to or used by OMH. Unsolicited confidential information submitted to OMH should be refused, returned to the sender where possible, and deleted, if received via the internet.

Mandatory compliance

Responsibility of all employees

OMH strives to comply with the laws, rules, and regulations that govern it and with recognised compliance practices. All OMH representatives must comply with this policy, the Records Retention Schedule and any requirements of the courts. Failure to do so may subject OMH, its representatives, and contractors to serious civil and/or criminal liability. A representative's failure to comply with this policy may result in disciplinary sanctions, including suspension or termination of involvement with OMH.

Reporting policy violations

OMH is committed to enforcing this policy as it applies to all forms of records. The effectiveness of the OMH's efforts, however, depends on its representatives. If you feel that you or someone else may have violated this policy, you should report the incident immediately to the leadership team. If you are not comfortable bringing the matter up with the leadership team, or do not believe the leadership team has dealt with the matter properly, you should raise the matter with the trustees of OMH. If representatives do not report inappropriate conduct, OMH may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action. No one will be subject to and OMH prohibits, any form of discipline, reprisal, intimidation,



or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or cooperating in related investigations.

Records management department and records management officer

The OMH Records Team is responsible for identifying the documents that OMH must or should retain, and determining, the proper period of retention. It also arranges for the proper storage and retrieval of records, coordinating with outside vendors where appropriate. Additionally, the OMH Records Team handles the destruction of records whose retention period has expired. The OMH Records Team is responsible for:

- administering the document management program and helping implement it and related best practices;
- planning, developing, and prescribing document disposal policies, systems, standards, and procedures;
- monitoring compliance so that representatives know how to follow the document management procedures and OMH's records are controlled;
- ensuring that the leadership team is aware of their document management responsibilities;
- developing and implementing measures to ensure that the OMH Records Team knows what information OMH has and where it is stored, that only authorised users have access to the information, and that OMH keeps only the information it needs, thereby efficiently using space;
- establishing standards for filing and storage equipment and recordkeeping supplies;
- identifying essential records and establishing a disaster plan to ensure maximum availability of OMH's records in order to re-establish operations quickly and with minimal interruption and expense;
- determining the practicability of and, if appropriate, establishing a uniform filing system and a forms design and control system;
- periodically reviewing the records retention schedules and administrative rules issued by the UK Government to determine if OMH's document management program and its Records Retention Schedule is in compliance with regulations;
- explaining to representatives their duties relating to the document management program;
- ensuring that the maintenance, preservation, microfilming, computer disk storage, destruction, or other disposition of OMH's records is carried out in accordance with this policy, the procedures of the document management program and the requirements of UK and EU law;
- planning the timetable for the annual records destruction exercise and the annual records audit;
- maintaining records on the volume of records destroyed under the Records Retention Schedule and the records stored electronically; and
- evaluating the overall effectiveness of the document management program.

How to store and destroy records

Storage

All paper copies of such documents shall normally be kept securely at the homes of members of the organisation's management team or board of trustees.

All electronic copies of such documents shall normally be kept either:

- in password-protected files on computers at one of the aforementioned addresses; or
- when stored on portable electronic devices, these devices shall themselves be



password-protected.

During an OMH holiday, some such documents (paper or electronic) may also be kept on-site in a lockable office, accessible only to members of the holiday's senior team. On a camping holiday documents are stored in lockable crates and/or locked tents. Additionally, the campsite is never left unattended.

When it is necessary to carry documents off-site, these will be kept in the charge of a member of the senior team. Should any sensitive document be lost, the incident should be recorded and the parent / guardian concerned notified at the earliest possible opportunity as per the data breach policy of OMH.

Destruction

OMH's Records Team is responsible for the continuing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of confidential, financial, and personnel-related records must be conducted by shredding if possible. Non-confidential records may be destroyed by recycling.

The destruction of records must stop immediately upon notification that a court proceeding is to begin because OMH may be involved in a proceedings or an official investigation (see next paragraph). Destruction may begin again once the requirements of the courts are extinguished.

Litigation holds and other special situations

OMH requires all representatives to comply fully with its published records retention schedule and procedures as provided in this policy. All representatives should note the following general exception to any stated destruction schedule: If you believe, or the OMH Records Team informs you, that OMH records are relevant to current litigation, potential litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails, until the OMH Records Team determines those records are no longer needed. This exception is referred to as a litigation hold or legal hold, replaces any previously or subsequently established destruction schedule for those records. If you believe this exception may apply, or have any questions regarding whether it may possibly apply, please contact the OMH Records Team.

In addition, you may be asked to suspend any routine document disposal procedures in connection with certain other types of events, such as the replacement of the OMH's IT systems.

Audits and employee questions

Internal review and policy audits

The OMH trustees will periodically review this policy and its procedures. Additionally, OMH will regularly audit representative files and computer hard drives to ensure compliance with this policy.

Where departures from this policy occur, the OMH Records Team should keep and maintain a record of what these departures are, why they have occurred and (if applicable) when they were rectified to adhere to the policy.

Questions about the policy



Any questions about this policy should be referred to the OMH Records Team, which is in charge of administering, enforcing, and updating this policy.

APPENDIX 1: Record Retention Schedule

Occasionally OMH establishes retention or destruction schedules or procedures for specific categories of records. This is done to ensure legal compliance and accomplish other objectives, such as controlling costs. Representatives should give special consideration to the categories of documents listed in the record retention schedule below. Avoid retaining a record if there is no business reason for doing so, and consult with the OMH Records Team if unsure.

RECORD	RETENTION PERIOD
Volunteer Records	
Contact details	For as long as consent is active but a minimum of two (2) years from the date of last OMH activity if no consent given during that time.
Bank details	For as long as consent is active
Passport number	For as long as consent is active
Driving licence number	For as long as consent is active
Disability requirements	For as long as consent is active
Medical records	Promptly after their purpose on the holiday has been served
Consent form for specific activities for volunteers under 18	Promptly after their purpose on the holiday has been served
Staff sign-off confirming updated knowledge of risk assessments and procedures	Promptly after their purpose on the holiday has been served
Third party references for volunteers	Promptly after their purpose on the holiday has been served
DBS certificate	Promptly after their purpose on the holiday has been served
Recruitment Records	
<i>Unsuccessful candidates</i>	
Contact details	
Qualifications	2 years from date of application
Employment history	2 years from date of application
Integrity of OMH/long-term records required by law	2 years from date of application
<i>Volunteers candidates</i>	
A record showing in respect of each volunteer, the person's: <ul style="list-style-type: none"> - full name; - sex; - date of birth; - address of employment (if employed); 	



experience of, and qualifications relevant to, work involving children	
- <i>Holiday makers</i>	15 years from the date of last OMH activity
Holiday makers' application forms	
Holiday makers' medical records including record forms for first aid and seizures and drug charts	15 years from the date of last OMH activity
Holiday makers' info sheets: personal management plans for holiday makers including individual medical care plans if these exist	15 years from the date of last OMH activity
Any allegations of abuse or neglect in relation to a holiday maker and action taken in response to such allegations	15 years from the date of last OMH activity
<p>To the extent not included in other documents within this Record Retention Schedule, a record showing in respect of each holiday maker, the person's:</p> <ul style="list-style-type: none"> - full name; - sex; - date of birth; - description of cultural and linguistic background and racial origin; - circumstances and date of use of a measure of control, discipline or restraint used in relation to the holiday maker; - any special dietary or health need of the holiday maker; - the name, address and phone number of GP and registered dentist of each holiday maker; - risk behaviour record forms; - accident record forms; - record of any incident where a holiday maker went missing; - details of any allergy, immunisation or medical examination of the holiday maker and of any dental or medical need or treatment of the holiday maker; - details of any medicines kept for the holiday maker in the premises and 	15 years from the date of last OMH activity



details of the administration of medicines to the holiday maker; and dates on which any money or valuables are deposited by or on behalf of the holiday maker for safekeeping and dates on which any money is withdrawn or any valuables returned.	
- <i>Administrative requirements</i>	15 years from the date of last OMH activity
Fire drill records	
Abbreviated accounts, trustee annual reports.	15 years from the date of last OMH activity
Staff duty rotas	15 years from the date of last OMH activity
Visitor's sign-in book	15 years from the date of last OMH activity
Record forms for Safeguarding together with details (such as contact details) pertaining to those incidents	15 years from the date of last OMH activity
Holiday maker and parent/guardian	
Contact details including next of kin	
Consent form for particular activities for holiday maker	For as long as consent is active
OMH administration records	Promptly after their purpose on the holiday has been served
Receipts for income and expenditure throughout the year	
Minutes and Agendas: AGM, Trustees' meetings, Senior Helper meetings	5 years from date of transaction
Insurance details	5 years from date of meeting
Note books in which volunteers have recorded information about managing challenging behaviour etc.	5 years from expiry of insurance cover
OMH donors and supporters	
Contact details	
Bank details	For as long as consent is active
	For as long as consent is active

Data Protection Policy

Introduction

This Policy sets out the obligations of Oundle Mencap Holidays Limited, a charity registered in England and Wales under charity number 1108908, whose address is at 58 Glaphorn Road, Oundle PE8 4PT (“**OMH**”) regarding data protection and the rights of data subjects in respect of their personal data under General Data Protection Regulation ((EU) 2016/679) (“**UK GDPR**”).

The UK GDPR defines “personal data” as any information relating to an identified or



identifiable natural person (a “**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets out OMH’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by OMH, its volunteers, agents, contractors, or other parties working on behalf of OMH.

OMH is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

The Data Protection Principles

This Policy aims to ensure compliance with the UK GDPR. The UK GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

processed lawfully, fairly, and in a transparent manner in relation to the data subject;

collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;

accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay;

kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of the data subject; and

processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.



The Rights of Data Subjects

The UK GDPR sets out the following rights applicable to data subjects (please refer to the parts of this Policy indicated for further details where relevant):

the right to be informed (Part 12);

the right of access (Part 13);

the right to rectification (Part 14);

the right to erasure (also known as the “right to be forgotten”) (Part 15);

the right to restrict processing (Part 16);

the right to data portability (not applicable to OMH);

the right to object (Part 17); and

rights with respect to automated decision-making and profiling (not applicable to OMH).

Lawful, Fair, and Transparent Data Processing

The UK GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The UK GDPR states that processing of personal data shall be lawful if at least one of the following applies:

the data subject has given consent to the processing of their personal data for one or more specific purposes;

the processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them;

the processing is necessary for compliance with a legal obligation to which the data controller is subject;

the processing is necessary to protect the vital interests of the data subject or of another natural person;

the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
or

the processing is necessary for the purposes of legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

If the personal data in question is “special category data” (also known as “**sensitive personal data**”) (for example, data concerning the data subject’s race, ethnicity, politics, religion, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:



- the data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless UK law prohibits them from doing so);
- the processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, or social protection law (insofar as it is authorised by UK law or a collective agreement pursuant to UK law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
- the processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- the data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
- the processing relates to personal data which is clearly made public by the data subject;
- the processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
- the processing is necessary for substantial public interest reasons, on the basis of UK law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
- the processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of a volunteer, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of UK law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article [9(3)] of the UK GDPR;
- the processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of UK law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or



the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article [89(1)] of the UK GDPR based on UK law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Specified, Explicit, and Legitimate Purposes

OMH collects and processes the personal data set out in Part 18 (Personal Data Collected, Held and Processed). This includes:

- personal data collected directly from data subjects; and
- personal data obtained from third parties.

OMH only collects, processes, and holds personal data for the specific purposes set out in Part 18 of this Policy (Personal Data Collected, Held and Processed) or for other purposes expressly permitted by the UK GDPR.

Data subjects are kept informed at all times of the purpose or purposes for which OMH uses their personal data. Please refer to Part 12 (Keeping Data Subjects Informed) for more information on keeping data subjects informed.

Adequate, Relevant, and Limited Data Processing

OMH will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 5 (Specified, Explicit and Legitimate Purposes), above, and as set out in Part 18 (Personal Data Collected, Held and Processed), below.

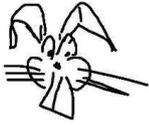
Accuracy of Data and Keeping Data Up-to-Date

OMH shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 14 (Rectification of Personal Data), below.

The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

Data Retention

OMH shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.



When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

For full details of OMH's approach to data retention, including retention periods for specific personal data types held by OMH, please refer to our Data Retention Policy.

Secure Processing

OMH shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Part 19 (Data Security - Transferring Personal Data and Communications) to Part 24 (Organisational Measures).

Accountability and Record-Keeping

OMH is not required to and has not appointed a Data Protection Officer.

The OMH Data Protection Team shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, OMH's other data protection-related policies, and with the UK GDPR and other applicable data protection legislation.

OMH shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

- the name and details of OMH, its Data Protection Team, and any applicable third-party data processors;
- the purposes for which OMH collects, holds, and processes personal data;
- details of the categories of personal data collected, held, and processed by OMH, and the categories of data subject to which that personal data relates;
- details of how long personal data will be retained by OMH (please refer to OMH's Data Retention Policy); and
- detailed descriptions of all technical and organisational measures taken by OMH to ensure the security of personal data.

Data Protection Impact Assessments

OMH is under the threshold of being required to carry out Data Protection Impact Assessments. This will be reviewed at intervals to ensure the OMH's status and activities remain under the threshold.

Keeping Data Subjects Informed

OMH shall provide the information set out in Part 0 to every data subject:



where personal data is collected directly from data subjects, and those data subjects will be informed of its purpose at the time of collection; and

where personal data is obtained from a third party, and the relevant data subjects will be informed of its purpose:

if the personal data is used to communicate with the data subject, when the first communication is made;

if the personal data is to be transferred to another party, before that transfer is made; or

as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

The following information shall be provided to data subjects as described in Part 0:

details of OMH;

the purpose(s) for which the personal data is to be collected and processed (as detailed in Part 18 (Personal Data Collected, Held, and Processed)) and the legal basis justifying that collection and processing;

where applicable, the legitimate interests upon which OMH is justifying its collection and processing of the personal data;

where the personal data is not obtained directly from the data subject, the categories of personal data to be collected and processed;

where the personal data is to be transferred to one or more third parties, details of those parties;

details of data retention;

details of the data subject's rights under the UK GDPR;

details of the data subject's right to withdraw their consent to OMH's processing of their personal data at any time;

details of the data subject's right to complain to the Information Commissioner's Office (the "supervisory authority" under the UK GDPR); and

where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it.

12.3 All of OMH's data protection privacy notices, applicable to the different types of data subjects in the different scenarios are available on OMH's website.

Data Subject Access

Data subjects may make subject access requests ("SARs") at any time to find out more about the personal data which OMH holds about them, what it is doing with that personal data, and why.



Individuals (including volunteers) wishing to make a SAR should do so by emailing sam@oundlemencap.com.

Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

All SARs received shall be handled by OMH's Data Protection Team.

OMH does not charge a fee for the handling of normal SARs. OMH reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

Rectification of Personal Data

Data subjects have the right to require OMH to rectify any of their personal data that is inaccurate or incomplete.

OMH shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing OMH of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

Erasure of Personal Data

Data subjects have the right to request that OMH erases the personal data it holds about them in the following circumstances:

- it is no longer necessary for OMH to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
- the data subject wishes to withdraw their consent to OMH holding and processing their personal data;
- the data subject objects to OMH holding and processing their personal data (and there is no overriding legitimate interest to allow OMH to continue doing so) (see Part 17 (Objections to Personal Data Processing) for further details concerning the right to object);
- the personal data has been processed unlawfully; or
- the personal data needs to be erased in order for OMH to comply with a particular legal obligation.

Unless OMH has reasonable grounds to refuse a request to erase personal data, all requests for erasure shall be complied with, and the data subject shall be informed of the erasure, within one month of receipt of the data subject's request. The period



can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

Restriction of Personal Data Processing

Data subjects may request that OMH ceases processing the personal data it holds about them. If a data subject makes such a request, OMH shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

Objections to Personal Data Processing

Data subjects have the right to object to OMH processing their personal data based on legitimate interests or direct marketing.

Where a data subject objects to OMH processing their personal data based on its legitimate interests, OMH shall cease such processing immediately, unless it can be demonstrated that OMH's legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

Where a data subject objects to OMH processing their personal data for direct marketing purposes, OMH shall cease such processing immediately.

Personal Data Collected, Held, and Processed

Details of the personal data that is collected, held, and processed by OMH can be found in OMH's Record of Processing (for details of data retention, please refer to OMH's Data Retention Policy).

Data Security - Transferring Personal Data and Communications

OMH shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;

where personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using recorded delivery; and



all personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”.

Data Security - Storage

OMH shall ensure that the following measures are taken with respect to the storage of personal data:

all electronic copies of personal data should be stored securely using passwords;

all hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;

all personal data stored electronically should be backed up and all backups should be encrypted; and

no personal data should be transferred to any device personally belonging to a volunteer and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of OMH where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the UK GDPR (which may include demonstrating to OMH that all suitable technical and organisational measures have been taken).

Data Security - Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to OMH’s Data Retention Policy.

Data Security - Use of Personal Data

OMH shall ensure that the following measures are taken with respect to the use of personal data:

no personal data may be shared informally and if a volunteer, agent, sub-contractor, or other party working on behalf of OMH requires access to any personal data that they do not already have access to, such access should be formally requested;

personal data must be handled with care at all times and should not be left unattended or on view to unauthorised volunteers, agents, sub-contractors, or other parties at any time; and

where personal data held by OMH is used for marketing purposes, it shall be the responsibility of the relevant volunteer to ensure that the appropriate consent is obtained and that no data subjects have opted out.



Data Security - IT Security

OMH shall ensure that the following measures are taken with respect to IT and information security:

all passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised; and under no circumstances should any passwords be written down or shared between any volunteers, agents, contractors, or other parties working on behalf of OMH, irrespective of seniority or department.

Organisational Measures

OMH shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

all volunteers, agents, contractors, or other parties working on behalf of OMH shall be made fully aware of both their individual responsibilities and OMH's responsibilities under the UK GDPR and under this Policy, and shall be provided with a copy of this Policy;

only volunteers, agents, sub-contractors, or other parties working on behalf of OMH that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by OMH;

all volunteers, agents, contractors, or other parties working on behalf of OMH handling personal data will be appropriately supervised;

all volunteers, agents, contractors, or other parties working on behalf of OMH handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;

methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed; and

all personal data held by OMH shall be reviewed periodically, as set out in OMH's Data Retention Policy.

Transferring Personal Data to a Country Outside the EEA

OMH shall not transfer ("transfer" includes making available remotely) personal data to countries outside of the EEA. If any need arises to transfer personal data outside of the EEA, OMH will contact the data subjects affected to obtain consent and explain the method it shall use.

Data Breach Notification

All personal data breaches must be reported immediately to OMH's Data Protection Team.



If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Team must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Team must ensure that all affected data subjects are informed of the breach directly and without undue delay.

Data breach notifications shall include the following information:

- the categories and approximate number of data subjects concerned;

- the categories and approximate number of personal data records concerned;

- the name and contact details of OMH's Data Protection Team (or other contact point where more information can be obtained);

- the likely consequences of the breach; and

- details of the measures taken, or proposed to be taken, by OMH to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

Implementation of Policy

This Policy shall be deemed effective as of 25 May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this.



OMH Holiday Makers and Guardians of Holiday Makers Privacy Policy

Policy Statement

This policy describes how OMH will make use of any of your personal data where you apply for a holiday maker to attend a OMH residential holiday.

It describes your data protection rights, including the right to object to some processing which OMH carries out. More information about your rights, and how to exercise them, is set out below in the "What rights do I have?" section on page 3.

Summary of how we use your data

- Oundle Mencap Holidays (also referred to as "OMH", "we" or "us") uses your personal data in order to administer and provide the service of its holiday camps to children and young adults with physical and learning difficulties. In this policy the use of "you" or "your" may refer to a holiday maker or a guardian of a holiday maker, as context dictates.
- Personal data the you provide to OMH is not shared with any third parties other than the government where required by law.
- Where we rely on your consent, such as for processing your contact details, health and dietary requirements (and other processing listed more fully below), you can withdraw this consent at any time. We may still process such data if we have a legal basis to do so other than consent but we will always let you know should we intend to keep processing any personal data without consent.

What information do we collect?

We collect and process personal data about all holiday makers when we receive an application for a holiday maker to attend a holiday provided by OMH and on a continuing refreshment basis during your time with OMH. This may include:

- your name;
- holiday maker's gender;
- holiday maker's age and date of birth;
- your home address, holiday maker's guardian's email address and phone number;
- photographs of holiday maker;
- holiday maker's cultural and linguistic background and racial origin;
- records of any incidents where the holiday maker's behaviour required serious intervention or where holiday maker was involved in an accident;
- your marketing preferences, including any consents you have given us;
- holiday maker's medical requirements;
- holiday maker's dietary requirements;
- other details provided in your application form;
- holiday maker's info sheets provided by you upon request of OMH; and
- emergency details of holiday maker's next of kin.

We also process other information about you that arises in the course of providing services to you



such as requirements arising from a particular disability or illness that you may have.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. In particular, references of your character, behaviour and ability to take part in OMH activities from third parties such as school teachers and other referees that you supply to us.

How do we use this information, and what are the legal bases for this use?

We process this personal data for the following purposes:

- As required by OMH to conduct and pursue our charitable cause and pursue our legitimate interests. In particular:
 - we will use your information to consider your application to attend OMH holidays;
 - we will use your information respond to any comments or complaints you may send us;
 - we monitor use of our, and use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline;
 - we use information you provide to personalise our website, products or services for you;
 - we use information you provide to investigate any complaints received from you or from others, about our website or our products or services;
 - we will use data in connection with legal claims, compliance, regulatory and investigative as necessary (including disclosure of such information in connection with legal process or litigation); and
 - we use data of some individuals to invite them to take part in market research.
- Where you give us consent:
 - we use information you provide to maintain a database of contact information and historical interaction with OMH;
 - we use information you provide to ensure your health and dietary requirements are correctly handled during any holidays you volunteer on;
 - we use the information you provide to conduct appraisals of our services year-on-year;
 - we may send you alumni-related media in relation to our relevant products and services, or other products and services provided by us and our affiliate charities; and
 - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law in response to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. OMH does not currently do this and has no plans to in the future. If we do, you have an absolute right to opt-out of direct marketing, or profiling we carry out for



direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

Who will we share this data with, where and when?

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that the charity is integrated with another charity, your details will be disclosed to our advisers and any prospective charity's adviser and will be passed to the new trustees of the charity.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format** and to ask us to **share (port) this data to another controller**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred. This likely to be the Information Commissioner's Office in the UK.

For marketing and alumni processing the provision of information is optional. The only consequence of refusal to provide marketing information is that you will not receive any non-functional communications from OMH. All other provision of your information is mandatory. Should you fail to provide any of the mandatory information, OMH will not be able to employ you as worker or volunteer for the holiday weeks that it provides.

How do I get in touch with you?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch at oundlemencapholidays@gmail.com or by writing to 58 Glaphorn Road, Oundle PE8 4PT.

How long will you retain my data?

We only retain your data for as long as we require it to fulfil the acts you have consented to or to



abide by statutory requirements. For specific retention periods of your information, please ask to see the OMH Document Retention Policy which contains these details. We would be happy to supply you with a copy should you require one.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on the OMH website and where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.



OMH Volunteer Privacy Policy

Policy Statement

This policy describes how OMH will make use of your personal data where you volunteer at OMH as a member of its unpaid personnel.

It describes your data protection rights, including the right to object to some processing which OMH carries out. More information about your rights, and how to exercise them, is set out below in the "What rights do I have?" section on page 3.

Summary of how we use your data

- Oundle Mencap Holidays (also referred to as "OMH", "we" or "us") uses your personal data in order to administer and organise its workforce and thus to provide the service of its holiday camps.
- Personal data that you provide to OMH is not shared with any third parties other than the government where required by law.
- Where we rely on your consent, such as for processing your contact details, health and dietary requirements (and other processing listed more fully below), **you can withdraw this consent at any time**, however, should you withdraw your consent to some crucial processing requirements, and we do not have any other legal basis to process your data, OMH may not be able to allow you to volunteer any OMH holidays since it would be required in order to perform the service.
- Please also note that where we process personal data on the basis of consent and you later withdraw consent, there are times when we shall not stop processing your personal data if we have a different legal basis to do so. If this occurs, we will notify you that we intend to keep processing your personal data due to our needs and obligations.

What does this policy cover?

What information do we collect?

We collect and process personal data about you as a member of OMH's personnel on an annual refreshment basis during your time with OMH. This may include:

- your name;
- your gender;
- your age/date of birth;
- your home address, email address and phone number;
- photographs of you;
- your passport number;
- your nationality;
- your qualifications;
- your national insurance number;
- your driving licence number;
- your marketing preferences, including any consents you have given us;



- your health requirements;
- your dietary requirements;
- other details provided in your application form and CV, such as references, work history and qualifications; and
- emergency details of your next of kin.

We also process other information about you that arises in the course of your duties such as performance reviews, disciplinary proceedings, employment records and any requirements arising from a particular disability or illness that you may have.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. In particular:

- references of your character and ability to take part in OMH activities from third parties such as school teachers, employers and other referees that you supply to us; and
- details of your criminal record from the Government via a DBS check.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- As required by OMH to conduct our charitable cause and pursue our legitimate interests, in particular:
 - we will use your information to consider your application to volunteer with OMH and any on-going involvement with OMH;
 - we will use your information to respond to any comments or complaints you may send us;
 - we monitor use of our website and services, and use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline;
 - we use information you provide to OMH to personalise our website, products or services for you;
 - we use information you provide to investigate any complaints received from you or from others, about our website or our products or services;
 - we will use data in connection with legal claims, compliance, regulatory and investigative as necessary (including disclosure of such information in connection with legal process or litigation); and
 - we use data of some individuals to invite them to take part in market research.
- Where you give us consent:
 - we use information you provide to maintain a database of contact information and historical employment or interaction with OMH;
 - we use information you provide to ensure your health and dietary requirements are correctly handled during any holidays you volunteer on;
 - we use the information you provide to conduct appraisals of our workforce year-on-year;
 - where you will be working with children, we conduct a DBS check as required by law;



- we will send you direct marketing and alumni media in relation to our relevant products and services, or other products and services provided by us and our affiliate charities; and
 - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law in response to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. OMH does not current do so but if we were to in the future, you have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

Who will we share this data with, where and when?

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that the charity is integrated with another charity, your details will be disclosed to our advisers and any prospective charity's adviser and will be passed to the new trustees of the charity.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format** and to ask us to **share (port) this data to another controller**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred. This likely to be the Information Commissioner's Office in the UK.



For marketing and alumni processing the provision of information is optional. The only consequence of refusal to provide marketing information is that you will not receive any non-functional communications from OMH. All other provision of your information is mandatory. Should you fail to provide any of the mandatory information, OMH will not be able to employ you as worker or volunteer for the holiday weeks that it provides.

How do I get in touch with you?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch at oundlemencapholidays@gmail.com or by writing to 58 Glaphorn Road, Oundle PE8 4PT.

How long will you retain my data?

We only retain your data for as long as we require it to fulfil the acts you have consented to or to abide by statutory requirements. For specific retention periods of your information, please ask to see the OMH Document Retention Policy which contains these details. We would be happy to supply you with a copy should you require one.

Where we process personal data for marketing purposes or with your consent, we process the data for as long as we have your valid consent and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on the OMH website and where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.



OMH Donors Privacy Policy

Policy Statement

This policy describes how OMH will make use of any of your personal data where you apply to donate or have previously donated to the OMH residential holiday.

It describes your data protection rights, including the right to object to some processing which OMH carries out. More information about your rights, and how to exercise them, is set out below in the “What rights do I have?” section on page 3. Summary of how we use your data

- Oundle Mencap Holidays (also referred to as "OMH", "we" or "us") relies on donations to continue its work to offer outstanding residential holidays and activity weekends to children and young people with learning disabilities.
- As an active or previous donor, OMH uses your personal data in order to administer its fundraising schemes and provide you with the donation service. In this policy the use of “you” or “your” may refer to any current or previous donor to OMH.
- Personal data that you provide to OMH is not shared with any third parties other than the government where required by law.
- Where we rely on your consent, such as for processing your contact details (and other processing listed more fully below), you can withdraw this consent at any time. We may still process such data if we have a legal basis to do so other than consent but we will always let you know should we intend to keep processing any personal data without consent.

What information do we collect?

We collect and process personal data about all holiday makers when we receive an application for a holiday maker to attend a holiday provided by OMH and on a continuing refreshment basis during your time with OMH. This may include:

- your name;
- your home address, email address and phone number;
- your marketing preferences, including any consents you have given us; and
- any other details provided in your application form;

We also process other information about you that arises in the course of providing services to you such as requirements arising from a particular payment requirement that you may have.

What information do we receive from third parties?

Sometimes, we receive some of the information about you from third party online donation platforms, such as JustGiving. This will only be the case where you have given the platform consent for your information to be shared with OMH.

How do we use this information, and what are the legal bases for this use?



We process this personal data for the following purposes:

- As required by OMH to conduct and pursue our charitable cause and pursue our legitimate interests. In particular:
 - as part of our commitment to best practice in fundraising, we will communicate with you by email and/or post to confirm receipt of your donation and to tell you how it will be used in line with our charitable aims; and
 - we may contact you by post at a later date to seek your financial support for our work. This contact will not be more frequent than twice per year and you are able to opt out at any time by using the contact details at the end of this policy.
- Where you give us consent we may contact you by email to seek further financial support and/or to update you on the impact of your previous support. Again, this contact will not be more frequent than twice per year. You can opt out at any time by replying to the sender or by using the contact details at the end of this policy
- For purposes which are required by law in response to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. OMH does not currently do this and has no plans to in the future. If we do, you have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

Who will we share this data with, where and when?

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that the charity is integrated with another charity, your details will be disclosed to our advisers and any prospective charity's adviser and will be passed to the new trustees of the charity.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format** and to ask us to **share (port) this data to another controller**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).



These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred. This likely to be the Information Commissioner's Office in the UK.

For marketing and alumni processing the provision of information is optional. The only consequence of refusal to provide marketing information is that you will not receive any non-functional communications from OMH. All other provision of your information is mandatory. Should you fail to provide any of the mandatory information, OMH will not be able to employ you as worker or volunteer for the holiday weeks that it provides.

How do I get in touch with you?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch at oundlemencapholidays@gmail.com or by writing to 58 Glapthorn Road, Oundle PE8 4PT.

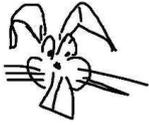
How long will you retain my data?

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Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on the OMH website and where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.



Equalities Policy and Procedures

Policy Statement

OMH supports inclusion of holiday makers and volunteers regardless of race, gender, sexuality, religious belief or any other potential discriminatory characteristic.

Inclusion for OMH means:

- Promoting access and inclusion for young adults and children with disabilities
- Promoting care and voluntary work
- Improving public attitudes to learning and physical disability
- Striving to create a holiday which provides for the needs of young adults and children with a range of disabilities and, where possible, to overcome barriers which may have ex/precluded service users from other residential holidays.
- Cultivating an organisation in which equality of opportunity is culturally embedded

Procedures

These inclusion aims are fulfilled by the following endeavours:

- Not discriminating between candidate holiday makers or volunteers on the basis of characteristics such as race, gender, sexuality or religion
- Making places available for any child or young adult who we feel may benefit from our activities
- Providing suitably medically trained volunteers for those holiday makers with complex needs, to ensure that they can access the holiday
- Providing a dedicated, experienced one-to-one carer for holiday makers who exhibit extensive risk behaviours, to ensure that they can access the holiday
- Striving to improve our service and facilities, through providing a wide and varied program of activities which match the range of holiday makers' needs on the holiday.
- Recruiting young people as volunteers who can learn from the experience and enter their adult lives with a positive attitude to disability

Including a number of trips to public places in the holiday timetable, during which we aim to provide positive examples of voluntary work, care and disability to the public.



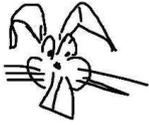
Family Policy

Policy Statement

Oundle Mencap Holidays welcomes volunteers with families. We believe that the holidays are significantly enhanced by both giving the opportunity for volunteers with young families to continue to take part in the week, and sharing the holiday with young children.

However we also acknowledge the need to monitor the inclusion of the partners and children of volunteers on the holiday to ensure that our charitable aims continue to be met and that the presence of family members does not affect the smooth running of the holiday. With this in mind we make the following statements:

- The inclusion of the partners and children of volunteers on the holiday is at the individual holiday leaders' discretion, and on a case by case basis.
- Volunteers may be asked to make a financial contribution to the holiday or to find alternative accommodation for their families during the week
- Family members who are not holiday volunteers are not permitted to take one-to-one responsibility for a child, even if they have a clear DBS check
- All adults staying in house, including volunteers' partners, must have an up to date and valid DBS check
- As volunteers' children get older they may be confused with one-to-one helpers and otherwise disrupt the week. Therefore we will welcome volunteers' children up to and including the summer before Year 10 / 4th Form, but not the summer before Year 11 / 5th Form
- Children of volunteers are able to apply to come as a helper the summer after Year 12/ Lower 6th assuming they are 17 years old.
- All the children of volunteers remain the parents' own responsibility and under their parental supervision at all times.



Governance Policy

Objects of the Society

The objects of the Society, as drawn from the OMH Memorandum and Articles of Association, are:

1. The relief of people with a learning disability in particular by the provision of help and support for them and for their families, dependants and carers;
2. To provide or assist in the provision of facilities for the recreation or other leisure time occupation for people who have need thereof by reason of learning disability with the object of improving their conditions of life.

Where "learning disability" means any developmental disability of the mind and any associated condition howsoever caused and whether mild, moderate or severe.

Policy Statement

OMH is dedicated to the care and well-being of holidaymakers and also to providing opportunities to young volunteers. Our governance systems are designed to ensure that we continue to meet the highest standards, securing the future of the organisation and providing continuity of respite care to families. We strive for professionalism as an organisation, respecting the contribution of all volunteers equally.

Governing Groups

In the descriptions of the main groups of individuals who provide oversight of the organisation, please note that any one individual may belong to more than one of the listed categories.

1. Trustees (including the Responsible Individual)

The OMH Board of Trustees consists of Trustees in the following categories:

Flexible number of co-opted trustees (elected every 4 years), Oundle School Representative, Senior Helper Representative (elected every 2 years), Parent Representative (elected every 2 years), External Trustee (elected every 2 years). All long-term trustees are also company directors.

Each trustee can stand for election for a second term of office. A trustee may serve for longer than 2 terms in exceptional circumstances which must be justified at the AGM.

The Registered Manager should be invited to trustee meetings but is not necessarily a trustee and so does not have a voting right as Registered Manager.

From within the trustees the following roles should be covered: Chair, Secretary, Treasurer and Responsible Individual.

Trustees take responsibility for the management of the charitable organisation that is OMH including: appropriate disbursement of funds towards charitable ends; oversight of fundraising activities; compliance with Charity Commission and Companies House regulations; oversight of affiliation relationship with Mencap; formulation of policies; oversight of Registered Manager.

Trustees other responsibilities include:

- To receive annual reports from the Registered Manager of each holiday;
- To receive financial reports from the Treasurer;
- To receive a report regarding fundraising and consider future strategy in light of financial reports;
- To consider the strategic plan for the charity and the holidays it runs or supports;
- To review annually the personnel roles, responsibilities and commitments across the charity and make / recommend appropriate adjustments;
- To review any complaints and/or serious incidents and establish whether appropriate action was and has been taken;



- To keep all policies under review on a rolling programme, including the Statement of Purpose;
- To review annually the membership and terms of reference of the trustee board; and
- To receive a Trustee Visit Report on each holiday.

The trustees regularly seek information from relevant bodies including Ofsted, the Care Quality Commission, the Royal Mencap Society, the UK Department for Education, the UK Department of Health and the British Institute for Learning Disabilities. In addition, they may invite expert consultation from friends of the organisation as and when need arises. All of these sources provide input to ensure that OMH continues to meet the highest possible standards, within our capacity as a volunteer organisation.

Trustees endeavour to reach consensus in all decision making and acknowledge a quorum of five as adequate for most matters. Trustees meet approximately four times per year as well as attending the holidays where possible. All trustees are unpaid for their trustee duties.

Trustees undertake to ensure that at least one trustee (in addition to the Registered Manager) is present at or visits a significant part of every holiday or camp run by OMH. This does not have to be the Responsible Individual (see below).

Specific Duties of the Responsible Individual

The Responsible Individual is a trustee who is also the representative of OMH when meeting their legal obligations, specifically the inspection of holiday schemes by Ofsted. The Responsible Individual undertakes to monitor and update his/her relevant training and skills in order to satisfactorily represent the organisation. He/she is closely engaged with the development and updating of the Statement of Purpose and all accompanying documents, and works closely with the Registered Manager to ensure policies and procedures are fit for purpose and effectively used. In particular the Responsible Individual ensures that the organisation follows good practice in recruitment and support of volunteers.

Trustees at the time of writing are:

Role	Name	Relevant experience
Chair	Robin Banerjee	Police Officer
Secretary	Anna Clish*	Volunteer for 31 years. Former teacher
Treasurer	Ed Barker	Investment professional
Registered Manager	Kate Taylor	Former Headteacher, specialist in education and lifespan care of children with disabilities
Trustee	Eddie Dove	Headteacher, Former Educational Psychologist
External Trustee	Jo Floto	Former OSMH senior team member, BBC news producer.
Senior Helper Trustee	Katrina Rowe	Long-standing volunteer, Teacher.
Parent Trustee	Mel Symonds	Foster or adoptive parent of three former OSMH holiday-makers.
Oundle School Trustee	Amelia Barker	Teacher

*current Responsible Individual

2. Registered Manager and Managers

The Registered Manager is appointed by the trustees to oversee all of OMH’s holiday schemes. He/she is required to have suitable qualification and practical experience in both working with children with learning disabilities and management of staff. The Registered Manager undertakes



to monitor and update his/her relevant training and skills in order to satisfactorily fulfil the role. He/she works closely with the Responsible Individual to ensure policies and procedures are fit for purpose and effectively used.

The Registered Manager is supported year round by the Senior Team and Care Manager who have relevant skills and experience in these specific domains. They provide assistance with the administrative responsibilities associated with the holiday schemes including key issues such as: development of personal and activity-based risk assessments; collation and organisation of confidential records; development of holiday activities and timetables. The Registered Manager is reviewed by the trustees to ensure their continued suitability for the role.

In the event that the Registered Manager is not present at a holiday, or a specific holiday activity, their responsibilities will be assigned to named members of the senior team.

3. Host Organisation representatives

OMH does not own any of the premises in which its holiday schemes take place. Thus it is reliant on the co-operation of members of the host organisations. These individuals co-ordinate the relationship between OMH and hosts, and may also oversee recruitment where this is also associated with the host (i.e. recruitment of pupil helpers, from a school which also provides a holiday site). Where a link to a host organisation has particular longevity and/or importance to the organisation, a representative of the host may also join the board of trustees.

4. Holiday Lead Team and Senior Team

During the holidays and camps the Registered Manager is supported by a large and experienced team of volunteers who have been associated with the organisation for many years. In particular the lead team are responsible for monitoring processes to maintain well-being and safety of both volunteers and holidaymakers. All senior team and lead team members are expected to be closely acquainted with the policies and procedures of the organisation. For more detail on the make-up of these teams please see the *Statement of Purpose* (section 8-10) and our website:

<http://www.oundlemencap.co.uk/homepage/volunteers/>

Affiliated Groups

OMH members and affiliates can be divided into four groups. While they do not take responsible roles within the organisation, each of these groups is welcome to attend our AGM.

5. Patrons and President

Patrons are people who have been influential and supportive of OMH over the years and may include: donors; former volunteers; local community members; representatives of host organisations. Richard Andrews is Life President of Oundle Mencap Holidays.

6. Volunteers

Volunteers attend the holidays and many also play a part in supporting OMH more generally year-round. More details can be found in the *Statement of Purpose*, section 9.

7. Beneficiaries

Our main beneficiaries are the holidaymakers. These are children, young people and adults with learning disabilities, and sometimes also physical disabilities. In addition in this category we would include their families and friends (including carers, foster families, etc.) as beneficiaries of OMH.

8. Other interested parties

This group includes representatives of our partner organisations including Mencap, Oundle School and Northamptonshire Girl Guides.



Members are defined as anyone who attended a holiday in the previous 12 months, including volunteers, holidaymakers (or a suitable representative if under 18 or deemed incapable of making an informed decision) trustees, patrons and OMH President. All Members have a voting right at the AGM.

Policy Review Procedure

All policy and procedural documents and their appendices are reviewed on a rolling programme by the Responsible Individual, Registered Manager and trustees. Policy changes may occur in the interim, in response to issues which arise during holidays. Policies may be updated: to reflect changes in practice; in response to incidents, observed patterns or complaints; to comply with recommendations and legislation.

The process for a policy revision is usually:

1. Policy for potential amendment is identified by the Responsible Individual (as part of the usual annual review), Registered Manager, another manager or another member of the senior team;
2. Recommendations for changes are brought to the trustees for consideration and discussed at a meeting;
3. A nominated individual undertakes to draft a revision of the relevant policy and circulate to trustees for approval;
4. Trustees may provide comments and additional drafts may be circulated;
5. The final policy can be approved by a quorum of trustees.

This cycle of review and revision is normally undertaken within the space of one or two years so that policies remain up to date and fit for purpose for the annual holiday schemes.



Media Policy and Procedures

Policy statement

We aim to create a family atmosphere on our holidays and therefore do not proactively seek, or encourage, attention or coverage from external media organisations.

However, we do acknowledge that our partners and benefactors may wish to report on our activities in their publications and online. We also acknowledge the importance of social media in the lives of our volunteers and as a tool to create an 'OMH community' which is sustained between the holidays themselves.

This media policy provides some brief guidance on reporting of OMH activities through formal and informal channels, as well as guidance on expected behaviour from volunteers and their use of personal devices for the recording, and sharing of media.

External reporting:

1. We refer to our holiday makers as "children and young people with learning difficulties" or "adults with learning difficulties" and ask that anyone reporting on our activities use the same or similar wording.
2. Anyone wishing to write about us is encouraged to contact one of the team (see the website for details) for help with their wording and for approval of images.

Internal policy

Explicit permission is sought from holiday makers themselves, or their family, to use photos and video taken during the week on our website and on official OMH controlled social media platforms (including, but not limited to, Twitter, Facebook and Instagram), to celebrate and advertise the holiday, for publicity, recruitment or fundraising purposes and to share with volunteers, holiday makers and their families.

OMH take the greatest care to ensure that the family and holiday makers' wishes are adhered to at all times.

Social Media

OMH's Twitter, Facebook and Instagram accounts are administrated by a small, designated number of current members of the Senior Team, who all have professional experience of maintaining social media accounts on behalf of large, respected organisations.

In the event of uncertainty over whether/what to post, internal discussion will be held within this team in order to reach a decision.

Facebook (<https://www.facebook.com/groups/2205242178/>) – The Oundle Mencap Facebook Group is a closed group only open to current and former volunteers to join. Parents or holiday makers who request access will be politely declined with an explanation. It is used primarily as a place to share news and updates with volunteers past and present, as well as generic (featuring no specific holiday makers) photographs from active holidays.

With regards the ability of members of the group to post their own content, any examples of incorrect use of language will be deleted with a reminder offered to the specific person. Any consistent use of such language or sharing of malicious or offensive material will result in their



immediate dismissal from the group along with relevant reporting to the Senior Management Team or Trustees.

Twitter (@OundleMencap) - In terms of content, Twitter is to be primarily used for sharing links to relevant stories and articles as well as information on OMH's fundraising efforts and any news from OMH throughout the year. All information and relevant links should be e-mailed to the account operators in order to be considered for posting.

During the holidays themselves, Twitter activity may extend to include photos and updates on the progress of the holiday. Only those holiday makers who have given permission will be included in any photos shared - as a general rule, close-camera portraits will not be shared.

Care will be taken to ensure that when on trips away from the Oundle School site, information on the group's exact location will not be disclosed.

Regarding language: respectful language will be used across our social media channels. As above, we will refer to our holiday makers as "holiday makers" or "children and young people with learning disabilities". The pattern of communication would be maintained at manageable levels, representing a flow of relevant/interesting information to the extended OMH community, but without overloading followers.

Volunteers will be able to tag '@OundleMencap' in their own tweets, particularly regarding fundraising, but will be asked not to use their own Twitter accounts during the week of the holiday.

Instagram (@OundleMencapHolidays) – As a platform based around the sharing of photography and short videos, Instagram has excellent potential to be used for ongoing engagement with the 'OMH Community' (current and former volunteers, supporters, holiday makers and families etc).

The account will be set as 'open', therefore not requiring approval for anyone to follow and see content. Content, therefore, will only be used as per clear permissions from families and volunteers, with similar guidelines as previously outlined for other platforms. Only those holiday makers who have given permission will have photos or video shared, with the use of close-camera portraits avoided.

The tone and use of language will be the same as utilized as above, along with no specific disclosure as to location when away from Oundle School.

Such photos, and short video clips will be used on 'live' holidays, but also throughout the year to maintain engagement with the OMH community. In addition, the account will be used for updates on individual fundraising efforts, 'non-holiday' events and other relevant news, as well as a useful call to action to drive people towards our website and fundraising pages.

Volunteer policy:

During the Mencap Holidays, there is an opportunity for a large number of photos and films to be taken by the volunteers and holiday makers, as on any holiday, via their own personal devices. OMH adopt a policy that zero photo or video recording should be undertaken by volunteers or holiday makers whilst on the holiday.

The general use of phones by volunteers whilst in active care of a holiday maker is discouraged, and explicitly not allowed for the purposes of photography or video capture except in exceptional



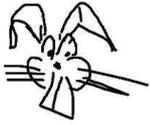
circumstances, where senior staff may record an event when the official camera may not be available. Images/videos will be deleted once used for purpose. It is accepted, however, that Group Leaders will often use phones for means of communication within the Group, particularly when off site. Volunteers will be encouraged to leave 'non OMH' related communications to their break times when not actively caring for a holiday maker.

In addition, we fully acknowledge the role of personal technology in the daily lives of both volunteers and holiday makers. Volunteers, holiday makers and parents are all given guidance on safe use at the beginning of, and prior to, the holidays. Safe practice may, for example, be playing a song for everyone to listen to or sharing a photo of the family pet.

Parents are reminded that if holiday makers bring their own technology OMH cannot be responsible for content accessed over mobile networks. Campers are responsible for their own phones and content, but camp staff must follow same safe practice and OMH policies.

Volunteers are welcome to take photos and video during the week whilst on 'time off', for example, but are reminded to be acutely aware of the reflection of their behaviour whilst the week is ongoing, even if they are not directly involved with any OMH activity at the time.

1. Volunteers and holiday makers are explicitly reminded that, during periods of one on one care, they should not be using phones or other devices to record video or photos. This eliminates issues relating to both adequate care and attention for holiday makers as well as related privacy issues.
2. 'Official' photos and video will be recorded via an identified member of the Senior Team responsible for photography and official video cameras distributed via Group Leaders to capture footage, with cameras returned and data captured (and deleted from devices) on a daily basis.
3. Volunteers are reminded that the sharing of any photos or video that *are* taken is not permitted, including on public social media platforms, as well as via private messaging software (e.g Whatsapp, iMessage etc) even amongst others directly involved in the holiday.
4. In some cases, special and specific permission may be sought for use of a particular image or piece of footage for publicity purposes and where this happens the family and holiday maker will always be given time to review the image or footage in question in advance
5. We further discourage volunteers from social contact with holiday makers outside the holiday schemes, including giving out personal phone numbers and becoming 'friends' or following via social media. This is to maintain a professional relationship and safeguard holiday makers.
6. Any volunteers who have concerns regarding contact they may have received from holiday makers or families via social media or any other platform should contact the Senior Management Team/Safeguarding Lead.



Reserves & Finance Policy

Policy Statement

OMH understands the importance of responsible financial management, and the varying factors impacting the procurement and utilisation of financing, including:

- The availability of current cash flow to meet current operating expenditure;
- The accumulation of suitable levels of reserves, in order to secure the future of the organisation and continue to meet its charitable goals;
- The goal of providing our service at a very low cost which is easily affordable by families, and to offer free places, discounts or structured payments where this is required; and
- The need to ensure the proper and prudent use of charitable donations.

Reserves Policy

The Charity Commission states that "Reserves are that part of a charity's unrestricted funds that is freely available to spend on any of the charity's purposes". OMH's Trustees feel it is prudent to build up the charity's reserves so as to:

- fund shortfalls in income, when income does not reach expected levels;
- fund unexpected expenditure, for example when projects overrun or unplanned events occur; and
- create a pool of expendable income in the event of promised funding from a particular source being unexpectedly cut.

OMH's reliable income comes each year from fees paid by the families of children and young adults attending our holidays. Fees are set by the management team at each holiday and reviewed by the OMH Trustees to ensure that they are appropriate. Holiday fees are subsidised by donations and the remaining funds required to run the holidays are sourced from fundraising activity.

The estimated total cost of running a summer holiday is around £40,000, depending on the size of the holiday (estimate assumes 40 children) and how much of the accommodation and associated costs are subsidised by the host organization (estimate assumes minimal). The cost of running Mencap Outdoors is around £15,000, with a further c. £15,000 of annual expenses by the charity. Consequently over 50% of OMH's annual income comes from sponsored events, grants from trusts and foundations, and ad hoc donations. This income is by its nature variable and can be unreliable.

The Trustees acknowledge that fundraising will always be to some extent irregular and that some years will see decreased fundraising activity (and therefore reduced income). To this end, they think it wise to adopt a policy which holds in reserve £25,000 over the normal annual running costs of the charity (implying £95,000 in total). In practice, our bank balance fluctuates materially over any 12 month period. When reserves are full, we would expect to see a peak annual bank balance of between £70,000 and £120,000 and a minimum annual bank balance of no less than £25,000. If this situation is maintained for a 12 month period then we can be confident that our reserves are adequate. A high-level budget is prepared each year in order to review recent income and expenditure and examine predictions for the coming 12 months.

If the reserves do begin to exceed the amount stated, it may not be prudent to take immediate steps to deplete the reserves unless a further increase is anticipated. However, options to do so include:

- a. Offering more free or assisted places to children from low-income households. This policy could run alongside an increase in child fees, softening the increase for those families who struggle to meet it;



- b. Hiring a nurse or other medical professional to attend the holiday each year;
- c. Replacing and upgrading large and long-term equipment, e.g. marquees, sports equipment;
- d. Hiring or buying a more suitable storage facility for equipment to be held in year-round, or upgrading the current facility with shelving etc.;
- e. Expanding the holiday either to include a larger number of children (and volunteers) or to run more holidays (see “New Holidays” below);
- f. Donating excess reserve funds to other charities with similar aims who are in need of support;
- g. Investing some funds using an endowment model, so that the annual return on investment can be disbursed back into the charity; and
- h. None of the above, if the Trustees reasonably believe it is prudent and in line with the charity’s Articles to maintain higher reserves.

When considering these options for spending reserves, Trustees must beware of committing to a policy which will extend spending for years to come. For instance, committing to paying a medical professional to attend the holiday week would make it difficult to terminate this employment if funds ran short. Therefore spending reserves in this way should be considered in the light of future income projections. In addition, if considering expansion of the holiday, Trustees must consider the availability of other resources, such as accommodation, facilities, voluntary staff and long-term costs. If an expansion is planned, the Trustees would do well to build up a large reserve to accommodate this option. The Trustees also commit to an annual review of OMH’s reserves policy to ensure that it is still relevant, accurate and as effective as possible.

Accounting & Insurance

- a. Financial matters are the responsibility of the group Treasurer, currently Ed Barker.
- b. They ensure that accurate records of all income and expenditure are kept, independently examined, submitted to Companies House and the Charity Commission, and presented at the AGM.
- c. It is the responsibility of the Treasurer to ensure that all activities of the group are covered by appropriate insurance, including: Public liability, Employer’s liability, Trustee Indemnity Insurance, Insurance cover for administration of medication.

Purchasing

- a. No item costing more than £500 should be bought without seeking three price quotations (where feasible) and gaining approval from a quorum of Trustees.
- b. As an alternative to the above, items may be bought without seeking quotations where expert advice has instead indicated a preferred supplier.

Cash security

OMH inevitably needs to withdraw and store fairly large cash reserves during the holiday to use for incidental expenses, especially ‘pocket money’ costs for holiday makers. To minimise the risk associated with this, the following measures are in place:

- a. Petty cash is stored in a locked cash box which is kept in locked residential accommodation overnight or (in the case of a camping holiday) in a locked tent or car.
- b. Wherever possible, cash is split between long-serving staff to prevent any one location holding too much cash; as with all cash, such distribution and subsequent use will be recorded.
- c. When staff and holiday makers leave the holiday site, the cash box is left in the locked admin room on site. During a camping holiday, the campsite is never left unattended.
- d. The holiday aims never to hold cash in a single location which exceeds the total covered by our insurance policy (currently £2,500).

Handling Money and Valuables on Behalf of Service Users

- a. The holiday provides pocket money for all children to buy small gifts, postcards or



- refreshments and this is administered centrally and equally between all children.
- b. Holiday makers are discouraged from bringing their own pocket money, but some bring small amounts typically not exceeding £20. Due to the small amounts involved this is not formally signed-in, though we do store these amounts centrally. The full amount is distributed to specific children on occasions when they might wish to spend it (i.e. visits to places with gift shops etc.).
 - c. Holiday makers are discouraged from bringing valuables to the holiday. Where valuables (including all non-essential mobile devices) are nevertheless brought, we state clearly to holiday makers and their parents / guardians that these items are not covered on our insurance policy and we cannot absolutely guarantee their safe return. If mobile devices are brought, parents are asked to sign a form to accept responsibility.
 - d. In the event that a holiday maker or their parent / guardian requests that we store items of value on their behalf we may agree to this. In this case a brief record will be made and signed by both parties to acknowledge receipt of the item.

Volunteer expenses

It is OMH's policy to reimburse volunteers for all reasonable expenses properly and necessarily incurred by them in helping to plan and execute holiday schemes run by the charity. Volunteers are expected in return to exercise good judgement and prudence with regard to expenses. Such expenses are typically to be reimbursed on the production of appropriate receipts or supporting documentation and with the authorisation of the Treasurer. OMH reserves the right not to pay expenses where no receipt is produced.

- Where possible, all expenses claims should be submitted within 90 days of the relevant activity.
 - Expenses should only be claimed later than 90 days with prior approval from the Trustees.
 - It is OMH's intention to reimburse volunteers within 30 days of a submission being received.
3. OMH reserves the right to amend this policy, including rates and allowances, without notice.
 - 4.
 5. On-Holiday Expenses: OMH does not expect volunteers to cover any holiday-related costs themselves. Any direct purchase for a service user (e.g. drinks, activities etc.) should be first claimed via a Group Leader (using pocket money) or, beyond that, via the Treasurer. For larger purchases, prior approval and a cash advance may be sought. OMH would expect any purchase of an individual item greater than £50 to have an associated receipt.
 - 6.
 7. Travel Expenses: OMH intends to reimburse travel expenses for travel undertaken to attend a holiday scheme, to attend a planning meeting, or any other reasonable travel incurred.
 - When a private car is used, a mileage allowance will be paid. Mileage should be claimed for the portion of the journey which relates to OMH's activities. Car mileage will be reimbursed at 25p per mile.
 - Where public transport is used, the cost of that travel will be reimbursed, including the cost of a taxi where this is necessary. Individuals must obtain a receipt wherever possible or retain the ticket.

Subsistence: Subsistence costs can be claimed when a volunteer incurs reasonable costs whilst volunteering for OMH. Such costs are assumed to include:

- *Meals / Catering* – This may include reasonable restaurant / take-away charges, or food and drink purchased and prepared in the home. Where someone is hosting a planning event, or OMH-related event in their home, OMH fully intends the individual to expense relevant catering costs.
- *Administration* – Any postage, telephone calls, stationery needs, photocopying, parking etc.
- *Accommodation* – Where an overnight stay is necessary to conduct volunteering activities,



reasonable costs in providing or obtaining said accommodation may be sought. Where wishing to claim the cost of a hotel or equivalent, prior approval should be sought from the Treasurer on behalf of the Trustees. Where an individual's home is used to provide necessary accommodation for other volunteers, reasonable reimbursement may be sought for costs relating to that overnight stay. Accommodation and meal costs should be reasonable. All claims for subsistence must be supported by receipts.

Training Expenses: Training costs, when prior authorisation has been granted by the Treasurer on behalf of the Trustees, and travel associated with attending training will be reimbursed.

New Holidays

In certain circumstances, the Trustees may approve the creation of a new holiday to be held in association with or under the direct control of OMH. Whilst Trustees' discretion may apply with regards to the funding of such activities, the guiding intention is that the charity would not directly fund such expansion through the purchase of equipment, payment for trips, payment for accommodation etc., but would be willing to incur administrative costs in order to establish the new holiday. For example, covering volunteers' expenses to attend initial meetings would likely be deemed an appropriate use of funds.

Money Laundering

- a. Transactions of the value of £9,000 and over are regulated by legislation in order to seek to prevent the incidence of money laundering through an organisation.
- b. If the Group receives amounts of money over £9,000, or a series of transactions amounting to that sum, the Group will seek as far as is possible to verify the identity of the person in order to legitimise the source of the money.



Standard Agendas

Much of the training offered to volunteers on the OMH residential holidays is delivered via group meetings. These standard agendas provide an outline of what information is imparted, by whom, to whom at each of these meetings. This is not an exhaustive account of the meetings held through the year but it does highlight the principal forums in which key business is carried out and training delivered.

1. **Trustee Meeting:** October / November

Items discussed: holiday outcomes (including monitoring of risk behaviour, incidents and accidents); monitoring of registered manager and responsible individual including review of training and support; current financial position; commencement of annual policy review process; volunteer recruitment, development, roles & responsibilities, ofsted report and any recommendations from it.

Attended by: A quorum of trustees including the Registered Manager and Responsible Individual, and (as needed) other managers, holiday lead team members, and specialist advisors.

Applicable to: All

2. **Annual General Meeting:** March

Items discussed: election of trustees; presentation of accounts; continuation of policy review process; review of holiday plans for the coming spring & summer, summary of previous years holidays.

Attended by: A quorum of trustees and members.

Applicable to: Mencap Outdoors, the Oundle summer holiday and any OMH run activity.

3. **Other manager and senior helper meetings:** January – June

Items discussed: holiday planning – events, trips, activities, staff roles, new holiday makers, volunteer DBS status, review of feedback from holiday makers and volunteers, ofsted recommendations, training needs, new ideas.

Attended by: managers, senior helpers and some trustees

Applicable to: All

NB: separate meetings of this kind may occur between sub-sets of the senior team as required. Meetings may be convened to plan specific activities for just one of the OMH holidays.

4. **New Helper Training:** April - July

Items discussed: introduction to the holiday for new helpers; discussion of some more complex issues - e.g. behaviour management, safeguarding, communication, personal care - to allow pupils to prepare for the week.

Attended by: new summer holiday helpers and some of those with one year experience

Applicable to: All

NB: this meeting is duplicated at each host organization for a children's holidays

5. **Camping training:** April - June

Items discussed: how to camp, outline for the holiday

Attended by: All Camp staff and other attendees, including all volunteers and holiday makers and their families

Applicable to: Mencap Outdoors

6. **Group Leader Introduction:** May

Items discussed: informal 'how to be a good group leader' training

Attended by: group leaders, recent GLs now on the senior team



Applicable to: All

NB: this meeting is duplicated with the relevant volunteers from each of the children's holidays

7. Senior Team Training: Jan - July

Some members of the senior team (and some GL) attend group Safety Intervention™ training sessions provided by an OMH Safety Intervention™ certified instructor. All members of the senior team, group leaders and special helpers are required to complete in-house behaviour management training. In addition some individuals are asked to undertake specialist training dependent on need and role e.g. Medication Handling, First Aid, Mental Health First aid, Food Hygiene, H & S and Fire Safety, Prevention of infection ad control, moving and handling. From 2021 SH, GL and special helpers are asked to complete online safeguarding training in addition to the in-house training provided.

8. Group Leader and Senior Team Training: night before holiday begins

Items discussed: roles and responsibilities of group leaders and senior helpers; key policy reminders (safeguarding, whistleblowing, medication); best practice reminders (safety, happiness, personal care, lifting); holiday content and structure; anticipated challenges

Attended by: Managers, holiday lead team, group leaders, senior helpers, trustees

Applicable to: All

NB: this meeting is duplicated with the relevant volunteers from each of the children's holidays and adult camps

9. Helper training: morning before holiday attendees arrive

Items discussed: roles and responsibilities of helpers, group leaders and senior helpers; key policy reminders (safeguarding, whistleblowing, medication); best practice (safety, happiness, personal care, moving and handling); holiday content and structure; anticipated challenges

Attended by: helpers, groups leaders, senior helpers.

Applicable to: All

NB: this meeting is duplicated with the relevant volunteers from each of the children's holidays

NB: this meeting does not apply to the Mencap Outdoors holiday because the large majority of volunteers on that holiday are experienced, and everyone is briefed as described in item 7.

10. Daily Senior Team briefing (during holiday week)

Items discussed: individual care / challenging behaviour issues; helper monitoring; daily responsibilities

Attended by: senior helpers, managers, holiday lead team

Applicable to: All

11. Daily Group Leader briefing (during holiday week)

Items discussed: individual care / challenging behaviour issues; meeting best practice standards

Attended by: holiday leaders, group leaders

Applicable to: All

12. Daily Group Briefing (during holiday week)

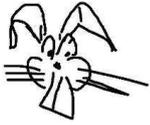
Items discussed: individual care / issues from the day. Plan for following day; meeting best practice standards.

Attended by: group leaders, helpers

Applicable to: All

13. Helper feedback: Wednesday evening during summer holiday week

Items discussed: reinforcement for achievements so far; meeting best practice standards; challenges ahead



Attended by: helpers, holiday leaders, registered manager
Applicable to: All

14. Management committee meeting (Friday evening of holiday)

Items discussed: Evaluation of Group leaders and helpers to assist with selection for following year.

Attended by: Holiday management team.

Applicable to: All

15. Holiday maker and helper feedback: Saturday morning prior to holiday end.

Items discussed: Holiday makers and helpers are asked for feedback on activities and suggestions for future years. This information is used to guide planning in the coming year.

Attended by: holiday makers, group leaders and helpers.

Applicable to: All

16. De-brief: day after holiday week ends

Items discussed: holiday outcomes; modifications for future years; volunteer management

Attended by: holiday lead team

Applicable to: All



Volunteer Recruitment Policy

Policy Statement

OMH seeks to recruit volunteers who will learn from the experience the holidays provide and will enter their adult lives with a positive attitude to disability. Volunteers are not expected to have specific experience or qualifications relevant to this type of care. However, volunteers should be at least 17 years old at the time of starting the holiday. The majority of applicants are expected to come from the school which hosts the holiday, however a small number will come from the local community.

New Helper Selection Process

- Year 12 and 13 pupils are informed about the holiday and are then invited to fill out and return an application form to the designated school representative
- References will then be called for all applicants as set out below to gauge suitability for the position
- To ensure proportionate cover on the holiday and to maintain experience the following allocation is normally reached for a holiday of 40 children (or pro rata for a smaller holiday):
 - 13 new male helpers
 - 13 new female helpers
 - 13 experienced male helpers
 - 13 experienced female helpers
- If there is an excess of applicants for any of the allocations as set out above, a selection process will take place based on references as set out below.
- Applicants who are not successful are invited to apply again the following year

New Helper Application Form and Reference Tracks

All new helpers are invited to fill out and return an application form, including employment history and details of any gaps in employment. New helpers are asked to write a short statement (no more than 200 words) detailing any relevant skills and their motivations for volunteering. OMH will call for references for all applicants. On holidays for children, the vast majority of new volunteers are current host school pupils, most will follow route 1 below. On camps for adults most volunteers will be recruited via route 2.

1. For host school applicants
 - a. One written reference by a member of staff; this member of staff will typically also be a holiday volunteer
 - b. One written external reference known to the applicant on a personal, professional, educational or similar capacity
2. For external applicants known to a current volunteer
 - a. One written reference by the current volunteer known to the applicant
 - b. One written external reference known to the applicant in a professional, educational or similar capacity
3. For non host school applicants not known to a current volunteer
 - a. Two external written references are requested from individuals known to the applicant in a professional, educational or similar capacity
 - b. An informal interview will take place prior to offering a place

References for each applicant will be verified. Verification will be attempted through verbal means in the first instance or a follow up email if the former is not possible. In addition, contact details of all OMH personnel are secured before they volunteer and are kept on record in accordance with our GDPR policy. For existing OMH staff, updated employment history will be



collected prior to each holiday covering at least the previous 12 months. Any follow up references required for existing staff will be considered on a case by case basis. As no holidays ran in 2020 due to Covid, all volunteers will be required to submit their previous 24 months of employment history.

Pre-holiday support and meetings for new helpers:

- New volunteers are invited to a meeting with the host school representative at least twice and registered manager at least once prior to the start of the holiday, for basic training and a Q&A session
- Volunteers will also meet with the nominated DBS checker during this process a number of times. The DBS checker is also a current Trustee of the charity
- Volunteers are supported by the senior team throughout the week and are directed to the Holiday Lead Team should they need further support.
- Further details on support, training and development for volunteers can be found in the Statement of Purpose.

Disclosure Barring Service checks

It is an essential requirement for all volunteers to undertake to register with the disclosure barring service (DBS) prior to attending a holiday. OMH has at least one experienced and approved DBS checker associated with the organisation who oversees initial registration to the DBS and annual DBS updates. These processes are completed in accordance with the guidelines and requirements laid out by the DBS.

Volunteers from overseas addresses are required to produce an equivalent criminal records check from their country of residence, which OMH supports with reference to the CPNI guidance on *Overseas Criminal Records Checks*.

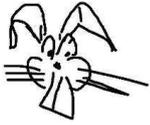
In the event that a volunteer's DBS check is incomplete at the start of the holiday, they may still be permitted to attend under the following conditions

- They have submitted a DBS application, signaling a willingness to engage with this process
- They are either a) a new volunteer or b) had a clean DBS check in a previous year in which they took part in the holiday
- A personal risk assessment is written and agreed between registered manager, DBS checker and the volunteer specifying the activities in which they can and cannot take part (e.g. excluding personal care or one-to-one supervision in isolation)

All volunteers not enrolled with the DBS update service are further required to complete an additional Declaration regarding recent criminal convictions immediately before the holiday begins. When three years have passed since their previous DBS application they will additionally be required to re-register and encouraged to subscribe to the update service.

Minimum Volunteer Age

OMH notes guidance in The National Minimum Standards which references an expectation of volunteers being 18 years or older. OMH believes there are material advantages to the organisation, the children in its care, and the volunteers themselves in permitting some 17 year old volunteers. These advantages include the bond formed between volunteers and children on our schemes, the impactful experience on young volunteers' lives and outlook, and the ambassadorial role that volunteers can play when returning to the final year of their school. We believe 17-year old volunteers to be an unique and necessary part of our service. OMH notes that Ofsted inspections have made explicit reference to the quality of volunteer procedures and practice, and these standards will be maintained. OMH's pastoral duties are heightened with under 18 year olds and the following must be adhered to when they are volunteering: specific



risk assessments, supervision and limited working hours. As part of these additional measures, 17 year olds may not be in sole charge of a child overnight and additional breaks should be added into the day. Anyone under the age of 17 will not be allowed to volunteer.

Experienced helpers

Appointment as a volunteer on any of the holidays or camps run by OMH signals affiliation to the entire organisation. A new recruitment process with references is not instigated when a current volunteer also applies to take part in another one of the OMH or affiliated holidays. The exception to this is when an individual is absent from active participation in the OMH or affiliated holidays and camps for a period of 24 months or more, in which case references and/or employment history will be sought as described in track 2 or 3 above. All returning volunteers are required to update the organization, in writing, with their last 12 months employment history, including any gaps in employment over this period.



Holiday Policies



Anti-Bullying Policy and Procedure

Policy Statement

Oundle Mencap Holidays is dedicated to the prevention of bullying in any form. All holiday makers and volunteers have the right to a secure and caring environment. They also have a responsibility to contribute, in whatever way they can, to protecting and maintaining this environment.

Definition of Bullying

There is no legal definition of bullying. Common characteristics of bullying are:

- Deliberate and repeated behaviour, with the intention of causing distress or harm, either physically or emotionally to others.
- It can be orchestrated by groups or an individual and aimed at groups or individuals, e.g., because of race, gender, religion or sexual orientation.
- Bullying can be verbal, physical, emotional or electronic.
- A bully is someone who targets others and makes them unhappy or frightened over a period of time.

Bullying can include: physical assaults; teasing, mocking; name calling, insulting comments; making threats; cyber bullying via electronic media; spreading rumours; stealing (hiding or damaging) someone else's property, taking or demanding monies; excluding someone from a group activity; writing offensive notes, letters, graffiti

A single incident may not be bullying, however if a behaviour is repeated it may be categorised as such.

The Law

Some forms of bullying are illegal and should be reported to the police. These include: theft; violence or assault; repeated harassment or intimidation; hate crimes.

The Children's Act (1989), states that a bullying incident should be raised as a concern where there is "*reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm*". In the context of OMH this principle equally applies to bullying of vulnerable adults. Where this is the case, incidents should be raised as outlined in the OSMH document on the protection of children and vulnerable adults.

Responsibilities

All participants in holiday schemes overseen by OMH seek to prevent bullying in the ways outlined.

Volunteers

- show self-respect and respect for others, providing good role models to the holiday makers.
- demonstrate high standards of personal and social behaviour
- are alert to signs of distress and possible indicators of bullying
- listen to and take any concerns raised seriously
- report matters for investigation to the relevant person
- create an environment where bullying is recognised as unacceptable and where all feel valued, respected, secure and happy

Holiday makers

- are encouraged to refrain from becoming involved in any kind of bullying
- feel safe and supported and able to tell staff on the holidays any concerns they have.



Anti-bullying procedure

Everyone on the holiday is encouraged to tell someone if they are being bullied. Incidents of bullying will be referred to the registered manager.

Volunteers suspecting an incident of bullying, should

- reassure the young person that their concerns will be taken seriously and investigated
- Inform the holiday leader as soon as possible.

The registered manager will investigate reported incidents of bullying through interviews with the young person (or people) concerned and any other relevant informants. These will use appropriate communication aids as required. During and after the investigation, the victim and perpetrator will be monitored by the holiday lead team. The investigation will be recorded using the Safeguarding Form.

If the investigation confirms a bullying incident has taken place, the holiday leader will further formulate a response. This response will include consideration of:

- the special needs or disabilities the young person involved may have
- strategies to manage and prevent future incidents, and sharing these with group leaders and / or senior team members
- reporting to the holiday's designated safeguarding officer if safeguarding issues are raised.
- reporting to other relevant authorities and individuals, i.e. the Police, Social Care, parents, host school (in the case of current pupils)

NB: it is recognised that some holiday makers may have a particularly good relationship with a member of the senior team, who it may be more appropriate for them to work with in the aftermath of a bullying incident. This will be at the discretion of the senior team and depend on skills and ability of the staff member.

Action resulting from an incident of bullying may include:

- revising seating proximity of young people during meals, on buses and at other communal times
- changing membership of holiday maker groups, to give young people space
- discussing behaviour and considering how bullying affects others
- being assisted to apologise

In the case of serious or repeated bullying, holiday makers may, as a last resort, be asked to leave the holiday.

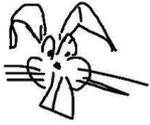
Bullying among staff

OMH further acknowledges that bullying can potentially take place between staff. In such cases approximately the same policies and procedures apply. Namely

- that the entire staff are encouraged to create an environment in which bullying is unacceptable and in which concerns can be raised and shared without prejudice
- that any incident of bullying will be fully investigated and recorded by the Registered Manager or (if more appropriate) another senior team member with appropriate skills and relationship to those involved. This can include, if necessary, involvement of external authorities
- that if necessary appropriate action will be taken to include: review of current staffing; discussion with individuals concerned; support to mend relationships if possible; and, in extremis, asking a staff member to leave.



- where bullying involves current pupils of the host organisation (e.g. Oundle School) this will be resolved in discussion between the registered manager and school staff, with reference to relevant host school policies.



Behaviour Management Policy and Procedure

Policy Statement

We aim to promote positive behaviour through affective communication, high quality relationships and by providing fun and exciting activities.

We recognise that some holiday makers who attend the OMH residential holidays may at times exhibit risk behaviour which may result in harm to themselves or others, or damage to property.

At all times our organisation aims to manage behaviour in a way which is respectful and dignified for the individuals involved. We acknowledge at all times the rights of an individual to be cross or upset, but will support and encourage individuals to express these feelings safely, and in ways acceptable to those around them. We acknowledge behaviours as a form of communication, the reasons for a child behaving in an inappropriate or challenging way can be varied; they may include frustration, anxiety, difficulties communicating, habitual or learnt behaviours, event triggered or attention seeking behaviours.

A guiding principle throughout is that we should strive to identify precursors to risk behaviour and help individuals to avoid a crisis occurring, through the use of proactive de-escalation and intervention skills.

Procedures on holiday schemes

The following procedures are in place to minimise risk behaviour:

1. The holiday staff have clear expectations for appropriate behaviour from holiday makers and these are communicated in a way which is accessible and meaningful to the individual. This may include verbal warnings, an agreed reward system or social scripts and stories.
2. Every holiday maker has a personalised plan for their care which notes their likes and dislikes, potential / known triggers for risk behaviour and strategies to prevent this occurring. This is based upon information from parents, care and education providers and previous knowledge of holiday maker. Holiday makers who have previously exhibited behaviour that challenges on a holiday or who are known to have behaviour that challenges will also have an individual behaviour management plan.
3. These plans are updated on a daily basis to reflect new information, and shared among group leaders, and then disseminated to senior team members and the individual's one-to-one helpers.
4. The holiday also provides for a small number of holiday makers who have higher support needs (medical or behavioural) They are assigned 'special' experienced helpers who provide continuity of care during the week.
5. Best Practice Guidelines created by OMH emphasise general ways to positively manage behaviour. These include offering positive choices and giving warnings when a favourite activity is coming to a close, use of visual resources, use of sensory breaks, opportunities for quiet times, swapping volunteers, opportunities to spend time on a favourite activity.
6. One-to-one volunteers are encouraged to request support if they feel a holiday maker is feeling anxious or cross, so that a senior team member can offer help or take over.
7. Senior team members are aware of anxiety and defensive behaviours (which may lead to risk behaviour) and have experience-based skills to help avert a potential crisis.
8. The senior team includes staff who are trained in Safety Intervention™ approaches delivered by the Crisis Prevention Institute (CPI). CPI training is provided internally by volunteers who are licensed by CPI to train. These licenses are renewed annually.
9. The Registered Manager and child leads regularly review behaviour records in order to recommend modifications to future practice.



10. The Registered Manager reports annually to Ofsted the number of times that restraint was used and the number of children restrained.
11. Group leaders, special helpers and the senior team have an additional in-house training package on managing and supporting behaviour.

The following procedures are in place to respond to risk behaviour as it occurs:

1. Senior team members step in whenever a serious incident occurs, both in order to manage the event and to allow the one-to-one volunteer to preserve a positive relationship with the holiday maker.
2. Wherever possible holiday makers are given space, time and support in order to calm themselves.
3. Physical interventions are only used in cases where it is judged that the risk associated with inaction is greater than the risk associated with action. Physical intervention would always use minimum amount of force, in the least restrictive way and be terminated at the first safe opportunity, and therefore be sustained for the minimum amount of time by Safety Intervention trained staff. OMH follows CPI definition that physical intervention includes disengagement as well as holds.
4. Occasionally children who are known to exhibit risk behaviour, which may require support to minimise self-harm will have an additional management plan, agreed with parents prior to the holiday.

The following systems are in place to respond to risk behaviour after it occurs:

1. Challenging behaviour incidents are recorded on a Challenging Behaviour Record Form. The form includes specific information required in regulation 16/3 and 16/4 and are noted on the holiday maker's individual plan. Parents are informed by the registered manager. First aid may be applied if necessary to anyone involved.
2. Senior team members meet regularly to reflect upon the implementation of future management strategies for holiday makers who have been involved in an incident.
3. Debriefing for individuals (holiday makers and staff) involved in an incident is provided by the Registered Manager or the Holiday's registered CPI trainers with appropriate communication supports as needed. Children are given the opportunity to be examined by a medical practitioner if they wish, and to have their views recorded on their personal care plan.
4. Senior team members and group leaders have many opportunities to engage in reflective and solution-focused practice with peers, supported by the registered manager.
5. Counselling and support are available from peers, the senior team and group leaders to anyone who is affected by an incident of risk behaviour.
6. Senior team members carry cards which can be handed out to members of the public who have witnessed or been affected by an incident in a public place. The text of these cards is reproduced below.



Oundle School Mencap Holiday

www.oundlemencap.co.uk

[current email]

[current phone number]

This card has been distributed to ease any distress and to thank you for your concern

The children and young people who attend our holiday have a variety of special needs. Sometimes these will show themselves in frustration, anger and occasionally aggressive behaviour. They may try to injure themselves or others, abscond and/or seriously damage property during their crisis behaviour. When this happens, we on occasion hold them, using positive handling techniques. Such crisis incidents can be distressing for the general public to witness. We cannot discuss this matter now but will be pleased to answer any questions if you contact us at the address overleaf.

7. In extremis, when it is felt that a holiday maker's behaviour is resulting in significant risk to themselves, others, or the integrity of the holiday, their family may be asked to remove them from the holiday.



Fire Evacuation Policy and Procedures: Adult Camping Holidays

Policy Statement

OMH takes seriously the risk of fire, especially given the mobility and communication needs of many holiday makers. We refer to guidelines from our host campsite, from camping organisations such as the Northamptonshire Girl Guides and, if needed, from local Fire Brigade officers, to meet high standards of fire safety. OMH takes advice on best practice from these sources, and rehearses a fire evacuation drill at the start of every holiday.

Procedures

Our procedures for the prevention and response to fire are as described below.

1. Fire Prevention

- a. OMH volunteers are all directed to comply with guidance on fire safety, and to avoid any hazardous activity on or off site.
- b. In particular no naked flames are permitted within tents; space is maintained between tents, and between tents and cooking/ campfire areas; no ground fires are permitted other than in the campfire circle; individual BBQs are used only under supervision
- c. Fire brigade access is maintained at all times.
- d. Volunteers are also instructed to ensure that any hazardous materials (e.g. cigarette lighters) are stored safely and in a location which cannot be accessed by holiday makers
- e. Holiday makers are supervised at all times, including at night.
- f. A fire safety and gas bottle check is conducted before retiring every night.

2. Fire Readiness

- a. The campsite is equipped with fire blankets and buckets of water are maintained at cooking and fire areas
- b. On the first day of each holiday, all volunteers and holiday makers have a fire safety briefing and a fire drill
- c. First aid trained personnel are present at the site in case of burns
- d. Mobiles phones are available on site to contact the emergency services if needed
- e. A three peep whistle system is in place for emergency evacuation in the event of a fire.
- f. Whistles are available in the kitchen area and on the site noticeboard and also with key staff.

3. Action in the event of a fire

- a. All holiday volunteers and holiday makers are instructed to assemble in the designated fire assembly point for a roll call
- b. Fire lists are held in easily accessible locations for roll call in the event of a fire assembly.
- c. Volunteers are to respond to their own name and that of the holiday maker for whom they currently have responsibility at the roll call, since holiday makers cannot always be relied upon to respond to their own name
- d. No volunteer or holiday maker is permitted to re-enter an area of risk in the event of the fire
- e. While volunteers have a responsibility to take reasonable steps to ensure the safe evacuation of the holiday maker they are with, they should not put themselves in danger to do so.



Fire Evacuation Policy and Procedure: Holidays in Permanent Residential Accommodation

Policy Statement

OMH takes seriously the risk of fire, especially given the mobility and communication needs of many holiday makers. We work with our host organisations and local services to meet high standards of fire safety and rehearse a fire evacuation drill at the start of every holiday.

Procedures

Our procedures for the prevention and response to fire are as described below.

1. Fire Prevention

- a. OMH volunteers are all directed to comply with host organisation regulations for the prevention of fire, and to avoid any hazardous activity on or off site.
- b. In particular no smoking is permitted any where within or close to the residences, or on the holiday play area.
- c. Any areas, such as the 'sensory room', which houses a large amount of electrical equipment (albeit low voltage) is checked by an electrician and all equipment turned off whenever the room is left vacant for a period of time.
- d. Volunteers are also instructed to ensure that any hazardous materials (e.g. cigarette lighters) are stored safely and in a location which cannot be accessed by holiday makers.
- e. Holiday makers are supervised one-to-one at all times, with the exception of the period from approx 9pm – 11.30pm when they are in their bedrooms with duty personnel in the corridors outside and 2 back up groups in the building.

2. Fire Readiness

- a. The premises of the host organisation are non-smoking and have suitable precautions such as hard-wired fire alarm systems, smoke alarms, fire extinguishers and fire blankets, and clearly signed fire exits.
- b. The fire alarm system is tested at the start of each holiday.
- c. In addition, on the first day of each holiday, all volunteers and holiday makers have a fire drill in which they start in their bedrooms – i.e. the hardest location from which to leave the building. Children to whom this may cause distress are identified and individually risk assessed.
- d. A report is produced on the effectiveness of the fire drill and reviewed accordingly by the holiday management team. This is also shared with ofsted.
- e. A Fire Marshall 'grab-bag' will be available at the main exit of each House. This bag must contain; a full list of volunteers and holiday makers, torch, pen, spare batteries, Hi Visibility Vest, emergency whistle, 1st Aid kit. Radios are placed in appropriate places to assist with reporting status during a fire evacuation.
- f. All volunteers are required to sign in and out of the site on daily lists that are kept near the 2 acre doors of each building.
- g. All visitors must sign in the visitors book in mission control where they are informed of the fire evacuation procedure and the information is provided on a lanyard.
- h. Each holiday maker has a Personal Emergency Evacuation Plan written as part of their individual risk assessment. Holiday makers with mobility problems and / or a particular aversion to the fire drill procedure are assigned a senior volunteer who will help to ensure their safe evacuation in the event of a fire.
- i. Other senior helpers are assigned an area of the building to check and clear in the event of a fire.



- j. During the evening 'duty' period (9pm – 11.30pm) a minimum of twenty volunteers (one volunteer to two holiday makers) are present in the building at all times to manage evacuation if needed.
3. Action in the event of a fire
- a. All holiday volunteers and holiday makers are instructed to leave by the nearest exit and assemble at the designated area for a roll call.
 - b. All off duty staff are contacted and asked to return to the houses.
 - c. Volunteers are to respond to their own name and that of the holiday maker for whom they currently have one-to-one responsibility at the roll call, since holiday makers can not always be relied upon to respond to their own name.
 - d. Volunteers are instructed to prioritise leaving the building and, if they are unable to assemble in the designated area, to attempt to pass a message to the group that they are safely out of the building.
 - e. No volunteer or holiday maker is permitted to re-enter the building in the event of the fire.
 - f. While volunteers have a responsibility to take reasonable steps to ensure the safe evacuation of the holiday maker they are with, they should not put themselves in danger to do so.
 - g. The children of volunteers in attendance are the responsibility of an identified parent at night.



Health and Safety Policy and Procedure

Each OMH holiday has a designated health and safety officer, who is currently, and until further notice:

- **Oundle Summer Holiday: Sam Cone**
- **Mencap Outdoors: Ally Itani**

This person has general oversight of all health and safety issues.

Policy Statement

OMH takes all reasonable steps to secure the health and safety of holiday makers, volunteers and visitors to the schemes. We adopt any health and safety guidelines issued by our host organisations and, when necessary, sponsor training for volunteers so that we can draw on their skills during the holidays.

Procedure

Activity risk assessment

- A named individual is responsible for undertaking a risk assessment for each holiday. The risk assessment is written with consideration of:
 - The hazards that may occur
 - The people or groups that may be affected
 - The risk i.e. the likelihood and severity
 - The control measures
 - knowledge of the workings of the holiday (including activities planned), the staff & holiday makers, the equipment, and the environment.
- The risk assessment is documented and reviewed at least annually.
- Review of risk assessments takes into account any accidents or near misses that were reported on the previous holiday.
- Where trips and activities occur in a new setting, OMH seeks risk assessments from the host organisation and, where reasonably practicable, the site is visited in advance of the holiday to judge its suitability and assess risks.

Individual Risk Assessment

- For children's holidays, each individual Holiday Maker has a personal care plan and risk assessment. The care plan contains their PEEP, key medical information, dietary requirements, as well as strategies for managing potential situations which may cause distress or behaviours that challenge.
- In the case of new Holiday Makers, initial information about their specific needs comes from the application form. This is then used to draw up Care Plans in collaboration with face to face meetings with parents/carers and young people where possible.
- Those Holiday Makers who have known behaviours that may challenge or additional physical support needs have in addition to their care plan a behaviour / moving and handling risk assessment.

Risk Management

For children's holidays, the risk assessment is mandatory reading for all senior helpers and group leaders and is circulated to them in advance of the week to allow time for careful study and clarification if necessary. It is also available on site for the duration of the holiday where it is accessible for all to read. Group leaders are responsible for disseminating the information to the



volunteers in their group. For Mencap Outdoors, the risk assessment is mandatory reading for all staff and is circulated to them in advance of the holiday.

The day-to-day implementation of the measures to minimise risk is the responsibility of all volunteers and this is overseen by the senior helpers, health and safety officer, and ultimately the registered manager.

Fire Safety

- See Fire Safety Policy and Procedure

First Aid

- See Medical Policy and Procedure

Maintaining equipment

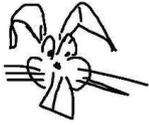
- Equipment is stored securely and appropriately.
- All items are visually inspected prior to use on each holiday.
- Where appropriate, items are cleaned and, if necessary, disinfected before use.
- Where it is the policy of the host school, electrical equipment is PAT tested. Where this is not the practice of the host school, electrical equipment is inspected and trialled before use.
- Equipment and resources that may be hazardous (e.g. scissors) are used only under adult supervision and kept in a safe place when not in use.
- Where equipment shows signs of damage it is repaired by a person with the necessary skills or disposed of safely.
- Volunteers who notice signs of wear or damage to equipment report it immediately to a senior member of staff.

Training

- All volunteers receive annual training appropriate to their role.
- In-house training includes moving and handling, personal care, fire safety awareness, communication, positive behaviour strategies, safeguarding for all.
- We support individuals to seek additional, external training in areas such as first aid, administration of emergency medications, Safety Intervention, mental health first aid, food hygiene, Safe handling of medication, PEG management, Midas, Designated Safeguarding Officer, Fire Warden. Health and Safety at Work, Prevent, Safer Recruitment.
- Additional training is arranged where review of the current knowledge, skills and training of staff indicates that it would benefit holiday makers and/or the organisation.
- Where a volunteer's role requires them to have specific training, we request documentary evidence of this.

Documentation and record keeping

- Forms are provided for the recording of all accidents and near misses, first aid, seizures, challenging behaviour record, medication errors and safeguarding concerns.
- All records should be completed as soon as is reasonably possible after the event and within 24 hours in all cases, in order that preventative measures can be instigated.
- The Registered Manager and holiday lead(s) is/are informed in the event of any accident of near miss and coordinates any immediate action that is required e.g. contacting of parents, alteration of risk assessment.
- Records are reviewed at the end of the holiday to identify any changes that should be made to reduce the chance of future incidents.
- Records are stored and destroyed according to the Data Protection Policy and Procedure.



Driving

- Any journey by car or minibus undertaken with a holiday-maker as passenger and OMH volunteer as driver shall adhere to this policy.
- All drivers shall strictly abide by general rules of the road (alcohol, drugs, insurance etc).
- Journeys by car shall only be made in those that are covered by business insurance.
- Journeys by minibus shall only be made in appropriately hired or purchased vehicles, with requisite insurance.
- Minibus drivers shall have had sufficient training in handling the vehicle and wheelchair restraints in minibuses shall only be fitted by individuals with appropriate training.
- For longer (over two hours) morning journeys, the driver should not normally be on call the prior evening. For long journeys at any time, the driver will ensure adequate rest prior to the journey.
- Drivers should not complete more than 4.5 hours of driving without a 45min break.

Other

- Insurance: All OMH activities are fully insured. A list of activities is provided for insurers and can be made available to holiday makers and their families if they wish.
- Welfare Facilities: Welfare facilities are provided for all, including, drinking water, toilets and somewhere to rest and eat.
- Healthy Environment: Sites used by OMH are maintained by the host organisation such that they provide a healthy environment. For example, they have good ventilation, reasonable temperature, enough light, enough space, appropriate waste containers and are clean.
- Safe Environment: Premises and equipment used by OMH are maintained by the host organisation such that they provide a safe environment, for example, floors, corridors and doorways are free from obstruction, windows open, and doors are secured appropriately.

Substances hazardous to health: Substances that may be hazardous to health such as glue, paint, disinfectant etc. are stored away from the main activity areas, to make them inaccessible to children when not in use.



Insurance Statement: list of activities on OMH holidays and camps, for insurers and parents

Below is a list of activities that children and young people may have the opportunity to take part in while on the OMH week. All activities are fully supervised with one-to-one care (Oundle Summer Holiday) or one-to-two care (Mencap Outdoors) as a minimum. Activities change from year to year so there is no guarantee that any particular holiday will feature the activities listed below. The list is aimed as a guide for holiday makers and their families. OMH will ensure that adequate insurance is taken out and that risk assessments are made for each activity.

On Site, supervised by volunteer staff from OMH only

- Art activities: including gluing, painting, finger-painting, modelling with clay, painting pottery, collage with feathers, sequins etc.
- Music and drama activities: including costume-making (without sewing), acting, singing, dancing (to live music) and playing musical instruments such as drums, tambourines etc.
- Games: including races, obstacle courses, cricket, football, tennis, playing in the woods etc.
- Sensory play: including interacting with pasta, cornflour and water, soap flakes, mashed potato etc.
- Camping activities including: putting up and dismantling tents; cooking food; using camp-site washing facilities; sleeping under canvas.

On site, supervised by professionals as well as OMH volunteers

- Swimming in a swimming pool supervised by professional lifeguards.

Off site, supervised by volunteer staff from OMH only

- Swimming in the sea. Children do not usually venture beyond a depth of one foot, and if the tide is high or conditions are rough children are not permitted to swim.
- Riding on fairground rides, including roller-coasters, dodgems etc.
- Playing on public adventure playgrounds and on swings, slides, climbing frames etc.
- Shopping
- Ten-pin bowling
- Quasar (laser-shooting team game)

Off site, supervised by professionals as well as OMH volunteers

- Outdoor centres: canoeing, raft-building, archery, high ropes and climbing, under safety conditions imposed by the Centre staff
- Twin Lakes: Soft play areas. Water rides, on shallow water, including boating and 'log-flume' rides. Trampolines.
- Twin Lakes / zoos and farms: including petting and feeding small animals such as farm animals, rabbits, guinea pigs etc. Adventure playground.
- Adventure parks: fairground rides, adventure playground, go-carts, miniature train.



Policy and procedure for the administration of medication, first aid and other medical care

Policy Statement

OMH will provide adequate first aid, seizure response and medical services to children and staff, specifically including:

- Sufficient appropriately trained staff,
- Adequate and well maintained equipment,
- Safe storage and appropriate administration of medication,
- Clear communication and documentation,

whilst striving to maintain the privacy and dignity of those using these services at all times.

This procedure is read by all members of the experienced volunteer teams and is reviewed on an annual basis. An appendix to this policy document is included in the Policies and Risk Assessments file, held on site during OMH holiday dates (see blank copy below). This appendix notes the names of all individuals who are permitted to administer medication and/or first aid, and their relevant qualifications.

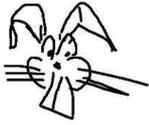
Three groups of staff oversee the matters outlined below.

1. The medical team are responsible for checking medications in supporting children to take their own prescribed medication, and giving over-the-counter medication if agreed with parent/guardian before the holiday. The medical team are also the first point of call in the case of illness that requires contact with the parent/guardian or taking to a medical professional such as the child's own GP.
2. Additional first aiders have a specific relevant qualification and are responsible for administering first aid as and when this is needed.
3. Seizure responders have specific responsibility for providing support and care when holiday makers have epileptic seizures.
4. Although some members of the senior team have professional medical qualifications, they are not on the holiday in their capacity as doctors, nurses or other medical professionals and carry out the roles above with the same additional training as staff without professional medical qualifications. At any time if someone required assistance from a medical professional they would be guided to their own GP or hospital as needed.

Procedures

First aid

- In advance of every holiday, a first aid needs assessment is carried out. This assesses the holiday's first aid requirements considering:
 - The type of holiday
 - The number, and attributes, of staff and children
 - The likely distribution of staff and children
 - The possibility of a first aider being called away e.g. through illness or bereavement
 - Any anticipated remoteness from the emergency services.
- It is then ensured that there are sufficient first aiders to meet the need. Designated first aiders are drawn only from the senior team, even when helpers or group leaders have a relevant qualification. This is for various reasons including the fact that helpers are unable to respond quickly as they have one-to-one responsibility for a child.
- A list of first aiders is recorded and a copy of their up-to-date certificate is viewed and stored on record.
- The first aiders are advised of their responsibilities and the limits of these: e.g. the recording of all first aid interventions, whether they should respond to seizures or whether there is a smaller nominated group to do that.



- Information regarding first aid is communicated to the volunteers. This includes:
 - Advising them that they should not perform any first aid including the application of plasters.
 - Introducing them to the first aiders and letting them know how to find them.
 - Explaining the role of other medical team members.
- A list of first aiders is kept in the policy folder, displayed in the medical room, and provided for all senior helpers and group leaders on a laminated key ring to serve as an easy reference.
- The medical lead on each holiday ensures that, when groups of children are visiting different locations, there are first aiders available for all.
- First aid kits are provided. The number varies according to the first aid needs assessment.
- First aid kits are kept stocked and in date by the medical team.
- When off site, first aid kits are carried by a number of nominated first aiders, usually the medical team. On site, at least one is available in the medical room.
- Parents or carers are asked in advance to give permission for OMH staff to administer a small range of over the counter preparations if deemed appropriate by a first aider or a member of the medical team. These over the counter preparations typically include, paracetamol, ibuprofen, bite and sting relief, antiseptic etc. Before any of these items is administered to a child their permissions and allergy status must be checked. In the case of paracetamol and ibuprofen, a check of the child's routine and as-needed medications, as well as recent first aid forms, must also be made to ensure that a dose has not recently been given.
- First aid record forms are provided and are kept in the medical room. These must be completed for every first aid intervention e.g. application of a plaster. At the end of the holiday, they are reviewed by the care manager and registered manager (alongside other forms, e.g. accident forms) to establish where any improvements or changes should be made to our practices.

Management of children's pre-existing medical conditions

NB: For further detail about the procedures for the administration of prescribed medications - see below.

- The parent or carer of each child is asked to list any medical conditions the child may have on the application form. These have included diagnoses such as epilepsy, diabetes, hypothyroidism, and mechanical heart valves.
- Information from parents is reviewed to ensure that the medical team has sufficient understanding and resources to care for the children, and that no additional medical training needs to be undertaken.
- For those children who need medical care that is more than administration of a fixed dose of medication (e.g. diabetes, intermittent catheterisation, supra pubic catheters, PEG feeding), parents or carers are called and/or met in advance of the holiday for detailed information.
- Where appropriate and reasonable, further training is taken by one or more members of the medical team to enable children with more complex medical requirements to attend the holiday.
- Once details of the care required for a particular complex medical condition is agreed between the medical team and the parent/carer, a care plan is written and signed by both parties. This serves several functions including preventing miscommunication, highlighting areas where the child's care may differ from routine practice, and avoiding the reliance on memory alone from one year to the next. Both parties are asked to sign the care plan each year, this helps to highlight any changes that might have occurred in that year.
- Whilst it has not yet occurred, there may, in the future, be circumstances in which the medical needs of the child outweigh the skills or experience of the medical team. In this case, we would recognise the limits of safety and may be unable to offer the child a place. Every effort to avoid this would be made e.g. considering allowing the parent or carer or one of the healthcare



professionals normally managing the child's condition to attend, as necessary, as a visitor, to perform medical procedures.

Epilepsy

- Those children who have epilepsy are identified in advance through the application form. At this stage their parent or carer also completes the epilepsy information form. This gives details on several aspects of their epilepsy including the type(s) of seizures (which helps us to identify them), their frequency (which helps us to plan care and risk assess), and the use of emergency medication. The completed information form acts as a care plan where this child does not have a pre-existing epilepsy care plan or is used alongside their own care plan.
- Children who have had prolonged, frequent or recent seizures may bring emergency medication in the form of rectal diazepam or buccal midazolam. Please see below for details of the administration of this medication and its storage.
- The number of staff members required to provide adequate coverage in response to seizures is identified in advance of the holiday alongside the first aid needs assessment.
- Staff members that will respond to seizures are selected from among the senior team in accordance with their skills and experience. This seizure response team is trained in advance of the week in the administration of emergency medication.
- Seizure response staff are on-call during the day. Nominated staff are assigned to an overnight rota to provide continuous night cover whilst avoiding over tiredness and allowing rest nights.
- When on-call, staff carry radios at all times in order to be able to hear a call for help.
- Clear information is provided to the volunteers at the beginning of the week so that the following is understood by all:
 - What to do in the case of seizure i.e. call for help, time and protect child from danger
 - What not to do in case of a seizure e.g. put anything in their mouth or try to restrain them
 - Who to call for help, how to do it and the importance of doing it straight away
 - The importance of having emergency medication immediately available and an appointed medical responder within a few minutes at all times
 - How to avoid precipitating seizures including avoidance of overheating, over tiredness, strobe lighting etc.
- Seizure forms are provided and kept in the medical room. All seizures (with the exception of absences) must be recorded.

Administration of medication

- Prescription medications must be supplied by parents/carers either in boxes with pharmacy labels bearing the child's name or accompanied by a copy of a recent prescription. Each family is advised of this in advance of the holiday.
- Where pharmacy labels are not present, medications are clearly marked with the child's name.
- At check-in, each child's parent/carer (or their nominated responsible adult) gives details of all medications to a member of the medical team. This includes details of the name, dose, times, route and mode of administration of every drug. The member of the medical team receiving that information records it on a drug chart/medication administration record (MAR Sheet) and the parent/carer signs next to each entry to confirm it is accurate. MAR sheets should, where possible, have a photograph of the child for identification purposes. The MAR sheet should also be signed by member of medical team receiving the medication. That person must also ensure that sufficient quantities of each medication have been provided and that it is date.
- After check-in each member of the medical team reviews the drug chart for each child they have checked-in with the other members of the medical team so that all members of the team are clear about the details of each child's medication.
- The administration of a particular child's routine medication is made the primary responsibility of one member of the medical team. Except in exceptional circumstances (e.g. medical team



member taken ill) that person will be responsible for administering that child's medication. This ensures that no child is omitted and that no child receives medication twice in error.

- The majority of medications are administered at daily 'clinics' in the morning and evening. When a child attends clinic for their medications, their drug chart is checked to identify which drugs are due to be given at that time. For each drug that is given the name, dose, route and mode of administration of each drug on the chart is checked against the drug being administered. A check is also made to ensure that the drug has not already been given.
- Bedtime helpers support their child to go to the medical room for their medication at the correct times (when these times are morning and/or evening). The times that the child should attend are listed on their individual care plan and the child's bedtime helper remains the same – these factors help to ensure that the children attend promptly and reliably when their medications are due.
- A member of the medical team will attend to a child in their room or in the bathroom, as appropriate, for medical interventions that should be discreet e.g. some cream applications.
- For medications needed outside clinic times, the medical team member will seek out the child e.g. at lunch.
- Each medication is initialed on the drug chart when it is given.
- At the end of every clinic, a checklist of children with medication is checked to ensure they have all attended and the drug charts are reviewed to ensure that every child has received the medications that are due.
- Also at the end of morning clinic each member of the medical team checks the charts of the children for whom they are responsible, to identify any drugs that may need to be given during the day (e.g. lunchtime doses) so that, if necessary, they can pack them securely to take on trips.
- The medical team coordinates to ensure that, when children who may require emergency medication are visiting different locations, there is always someone available who is able to administer the medication if needed.
- The helper of any child with emergency medication carries a radio at all times so that they can contact a member of staff trained to give the medication if necessary.

Medication errors:

- If an error occurs in the administration of medication, or a medication is missed, this must be reported immediately to the medical lead who is responsible for informing the registered manager. The registered manager or medical lead must then inform the parents and if deemed necessary seek advice from a medical professional.
- All errors must be recorded on the MAR sheet and an errors form completed. The child will then be closely monitored and appropriate action taken.

Medication refusal:

- If a child refuses medication, the medical lead must be informed immediately. All reasonable efforts should be made to get the child to take the medication. If this cannot be achieved within a reasonable time frame, the registered manager must be informed. The medical lead or registered manager must then inform parents and seek medical advice.
- All refusals must be recorded on the MAR sheet and an incident/near miss form completed. Children will then be closely monitored and appropriate action taken.

Compromised medication:

- Medication that has been compromised e.g. dropped on floor / spat out must be disposed of safely – placed into an envelope and taken to a pharmacy for disposal. Whilst awaiting



disposal it must be returned to the locked medical boxes. In order to maintain accurate stock levels this must also be noted on the MAR sheet.

Storage of medication

- All children's medication is transferred from the parent/carer (or their nominated adult) who drops the child off at the holiday to the medical team at check in.
- At check in, medications are placed directly into lockable boxes. Each member of the medical team has a copy of every key. This aims to ensure that all medications are available to those able to administer them but that medications are secure from unauthorised individuals.
- If at any time, a medication box is left open (i.e. when in use) a member of staff will remain present.
- At times during the holiday when medications are not being used they remain in locked boxes in the medical room (with the exception of emergency medications – see below). Further the medical room is locked when the holiday staff are off-site.
- Emergency medication (e.g. midazolam, diazepam, salbutamol, epi-pens), which needs to be immediately accessible at all times, is kept in the medical room, in labeled containers in a designated location, well out of reach of children.
- Children are closely supervised at all times during the holiday and as such are unable to access the medical room unsupervised.
- When off site, 'PRN/as required' medications are kept by a member of the medical team and remain on their person at all times so that they are secure.
- When off site or more than a few minutes run from the medical room, emergency medication is held by the helper who is providing one-to-one care to the child concerned. It remains on their person at all times so that it is secure.
- When a helper takes responsibility for emergency medication, the medication is signed out by their group leader and signed back in again when it is returned so that the medical team know who has the medication and are able to ensure that it has gone out with the child and is returned to the correct place on return to the site.
- Medication is stored according to the manufacturer's instructions e.g. at the correct temperature.

Controlled drugs:

- It is necessary to ensure that there is provision for the correct storage and management of controlled drugs that the Holiday Makers may have been prescribed. It is unlikely that children receiving Schedule 2 or 3 drugs would be considered as being able to come on the holiday, however the pre-holiday parent questionnaire will identify any medication that will be coming on the holiday. All controlled drugs will be stored in accordance with NICE Guidelines [NG46].
- Diazepam or Midazolam are the most likely Controlled Drugs that children may be under treatment with whilst on the holiday. Midazolam is a Class C, Schedule 3 drug (according to Misuse of Drugs Regulation 2001), and is exempt from safe custody requirements. Diazepam is a class C Schedule 4 part 1 drug which are not subject to safe custody requirements and separate controlled drug registers are not required. As part of the holiday Risk Assessment, it was determined that the storage of medications on the holiday is appropriate for the storage of Midazolam or Schedule 4 part 1 drugs [NG46 1.3.1].

Staff medication and medical conditions

- Volunteers are asked to give details of medical conditions and medications on their database form in case of emergency.
- The routine care of all medical problems is left entirely in the hands of the volunteer unless they ask for support.



- Staff sharing rooms with children are required to store medications in a box in the medical room to prevent them being taken accidentally by a child.
- If a volunteer has a condition for which they carry emergency medication or may need emergency care they are asked to inform the medical team in confidence.
- Where a volunteer becomes unwell the medical team will discuss the best course of action with the holiday lead. It may be, especially in the case of infectious disease, that a period of isolation or departure from the holiday could be necessary.

Contacting external medical services

- Phones with sufficient charge are carried by members of the medical team and/or holiday lead with each group of children in case the need to contact the emergency services arises.
- In the case of children with increased probability of needing an emergency ambulance (e.g. poorly controlled epilepsy or severe allergies) the possibility of being in a rural area with no phone signal or ambulance access is anticipated and avoided.
- A list of the names, addresses and contact numbers of nearby medical facilities is kept in the medical room and carried out on trips so that if it is necessary to access a doctor no delay is encountered.
- The details of medical conditions and parent/guardian contact details for each young person and volunteer is taken out on all trips in case of a hospital trip or other unexpected event. This information is kept secure and confidential at all times by a member of the senior team.
- Where time allows, contacting GP surgeries etc. and parents is done only after consultation with the holiday lead. This is not the case where it would delay an urgent or emergent call e.g. 112/999 call.

Clinical waste and sharps disposal

- Rubbish that is soiled with body fluids (inc. urine, vomit, blood, faeces etc.) is disposed of via the clinical waste (yellow bag) system where this is the advice of the local authority.
- Clinical waste bags are obtained and their collection arranged in advance of the week.
- Where clinical waste facilities are not available (e.g. out on trips) small quantities of clinical waste (e.g. a used incontinence pad) may be disposed of in the domestic waste in the same way as families will be doing at home.
- Where the use of 'sharps' (sharp items contaminated with bodily fluids e.g. lancets used for testing blood sugar in diabetes) is anticipated, the provision, correct use and disposal of one or more sharps boxes is arranged in advance.



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People responsible for administering signed-in medications:

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People permitted to administer rectal diazepam:

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People permitted to administer buccal midazolam:

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Missing Child Policy and Procedure

Policy Statement:

Oundle Mencap Holidays has the highest regard for the safety of the children and young people in our care. Volunteers will always be extremely aware of the potential for children to go missing during our holidays. Even when all precautions are properly observed, emergencies can still arise.

Prevention of children going missing

Oundle Mencap Holidays supports all children and young people on its children's holidays one to one during waking hours. This is stressed at all times to volunteers and managed by group leaders, who are responsible in the first place for the whereabouts of a child and their individual volunteer. All group leaders and senior team carry radios. Radios are also given to volunteers supporting individuals with high level medical needs or behavioural needs (especially if there is a known risk of absconding). A risk assessment of each child is carried out prior to the holiday and is communicated to volunteers via 'care plans'. All volunteers carry a personal mobile phone and are encouraged to have the 'what three words' App installed to enable them to give an accurate location should they find themselves separated from the rest of the group or in difficulty. Group leaders will undertake periodic head counts, especially at the transition points between activities. All external trips are risk assessed prior to visit and senior staff deployed to minimise risk of a child going missing. All volunteers are vigilant to any potentially suspicious behaviour or persons in and around the holiday venue. Once children are in bed, there is a minimum ratio of 2 staff to 1 holiday maker in the building, with teams of staff on duty to support children.

Procedure in the event of a child being reported as missing:

If for any reason a volunteer cannot account for a child's whereabouts, the following procedure will be activated:

- The volunteer will immediately inform the nearest group leader or senior helper
- The group leader or senior helper will communicate to the rest of the staff using the radios by asking "*Has any one seen [child name] and their helper Pluto*". This code word, 'Pluto' will immediately alert the senior team that a child is missing
- A thorough search of the entire site will commence immediately. Where possible this will be coordinated across the radio by a member of the senior team who can access a map of the area promptly and/or has a good knowledge of the area
- The police will be informed by the Registered Manager (or their deputy for that trip)
- The senior team will be careful not to create an atmosphere of panic and to ensure that the other children remain safe and adequately supervised.
- The registered manager must be informed immediately about any episode concerning a child reported as missing.

Procedure in the event that a missing child is not quickly found

- As the children in our care are highly vulnerable, they would be in danger if they were out in a public place unsupervised and therefore we would contact the police via 999
- While waiting for the police to arrive, searches for the child will continue. During this period, other volunteers will maintain as normal a routine as is possible for the rest of the children on the holiday
- The registered manager (or their deputy for that trip) will be responsible for meeting the police and the missing child's parents. The registered manager (or their deputy for that trip) will coordinate any actions instructed by the police, and attempt to comfort and reassure the parents.

Responding to the event after it is resolved

Handbook

Last updated 24.07.2022

Relevant to: all OMH activities



- Once the incident is resolved, the registered manager and the senior team will review relevant policies and procedures and implement any necessary changes (paying particular note to the relevant provisions of the risk assessment for that particular venue and for the personal risk assessment for that child)
- All incidents of children going missing the holiday will be recorded on an Risk Behaviour Form, and in cases where either the police or social care have been informed, Ofsted will also be informed, as soon as is practicable.



Safeguarding Policy

Policy Statement

We believe that every individual in our care, regardless of age, has at all times and in all situations a right to feel safe and protected from any situation or practice that results in a holiday maker being physically or psychologically damaged. In our group, if we have suspicions about a holiday maker's physical, sexual or emotional well being, we will take action. All volunteers or staff are encouraged to share concerns with the OMH safeguarding Officer.

The aims of this Safeguarding Policy are as follows:

1. To ensure that the welfare of every holiday maker involved in OMH activities is paramount;
2. To state that all holiday makers involved in OMH activities, without exception, have the right to protection from abuse;
3. To ensure that such protection is adequately provided by OMH;
4. To ensure that all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately; and
5. To ensure that all the OMH personnel understand the definitions of abuse, physical abuse, emotional abuse, sexual abuse and neglect and the need to be vigilant in identifying cases of abuse at the earliest opportunity;

It can also involve a range of potential issues such as:

- Bullying, including cyber bullying (by text message, on social networking sites, and so on) and prejudice based bullying.
 - Racist, disability, and homophobic or transphobic abuse
 - Radicalisation and extremist behaviour
 - Child sexual exploitation
 - Sexting
 - Substance misuse
 - Issues that may be specific to local area or population, for example gang activity and youth violence
 - Peer on Peer abuse
 - Particular issues affecting children including domestic violence, sexual exploitation, female genital mutilation and forced marriage.
6. To ensure all OMH personnel understand how to support and respond to a holiday maker who discloses significant harm.
 7. To understand that all OMH personnel have a responsibility and an opportunity to report concerns about holiday maker welfare and safety.
 8. To ensure all OMH personnel have been recruited safely and a single central record is kept, satisfactory DBS checks are made in accordance with guidance.
 9. All OMH personnel understand the categories of abuse, indicators and know how, when, who and how to record and report all safeguarding concerns

Unless otherwise stated the holiday safeguarding officer will always be the registered manager and their deputy who is a member of the management team.

Procedures

To fulfil these aims, OMH promotes the following procedures to be used / made available during all OMH activities.

Best practice guidelines

OMH publishes a Best Practice & Safeguarding Guidance and Safe Guarding poster for all personnel outlining the following:

Handbook

Last updated 24.07.2022

Relevant to: all OMH activities



- a. A statement of rights for every holiday maker: to be treated as an individual; to be treated with respect and dignity; to be valued and cared for; to be kept safe.
- b. A description of the meaning of these rights
- c. Definitions of different types of abuse
- d. Rules to enhance the safety of each holiday maker
- e. Reminders of where junior volunteers can seek help
- f. Guidelines for good practice in intimate care
- g. Tips for managing behaviour that challenges without adopting a negative relationship or attitude to the holiday maker concerned
- h. Tips on ways to communicate effectively with a holiday maker

OMH activities are designed such that a holiday maker is rarely alone with a single volunteer. One-to-one private care is only given when it is in the interests of preserving a holiday maker's dignity and privacy (e.g. personal care situations).

Training in communication, appropriate personal care and other care techniques is given to all volunteers. In addition, designated volunteers are trained in specialist techniques to meet each holiday maker's individual needs. e.g. moving and handling and PEG feeding. If necessary, parents and carers offer direct training to volunteers to ensure that they can cater to a holiday maker's individual needs.

Unsanctioned practices

The above also outlines those behaviours which are never sanctioned by OMH. Categories of abuse are listed and include: physical abuse, emotional abuse, sexual abuse, financial abuse and neglect. We provide examples of unacceptable behaviours including; shouting, threatening, using physical punishment, depriving a holiday maker from food or drink or letting them over-eat, using sarcasm or teasing, belittling or shaming a holiday maker, neglecting a holiday maker.

Recruitment and selection systems for all OMH personnel

Recruitment and selection procedures are outlined in the Volunteer Recruitment Policy. In brief, OMH uses a combination of personal recommendations, written references, DBS checking and (if necessary) interviews to screen potential volunteers. Once a volunteer is a participant in the organisation then renewed DBS checks, regular in-house training, direct oversight, support and (if necessary) specialist training are employed to maintain suitability for the role. In 2022 all volunteers are required to complete online safeguarding training (if they do not already have it for their professional roles – volunteers must provide evidence of this training). Personnel are encouraged to report any concerns or suspicions to the nominated Safeguarding Officer, under the section on whistle-blowing, outlined below.

Systems for response to suspicions and allegations of maltreatments or abuse:

On the OMH holidays, holiday makers have a network of people to whom they can turn in the event of any concerns

1. Holiday makers are assigned a volunteer helper on their first day and this person is their first contact in the event of any concerns. The holiday maker will spend their bedtimes and early mornings with this volunteer and this is an opportunity to discuss problems of any kind.
2. Holiday makers spend the day-time with a group of volunteers, led by a group leader. Holiday makers can report any concerns to any group member or to their group leader.
3. In addition, senior volunteers are constantly available and are assigned to spend time with specific groups of holiday makers during off-site excursions. These senior volunteers are a further person to whom any holiday maker can direct concerns.



4. Holiday makers all receive a Holiday Makers Guide which explains at an appropriate level what they can expect from the holiday.
5. Posters also direct Holiday Makers to people who can help them.

On the OMH camps, young adults are part of a large group of other Campers and volunteers who operate as a family. Within this group a number of relationships provide opportunities for Campers to share concerns

1. The majority of Campers will have attended previous OMH holiday and so will have existing friendships with the experienced volunteers on the Mencap Outdoors holiday
2. On the first day each Camper will have a designated volunteer to meet and greet them and help them settle in. Particularly in the case of Campers, this will be an opportunity to forge links
3. Each evening Campers are assisted in their bedtime routine by familiar staff, and this is an opportunity for those Campers to share any concerns. In addition there is an on-call member of staff available at night.
4. Specific members of the volunteer team such as the medical officer and the Registered Manager will be clearly designated as people who should be approached in the event of any worries or problems.

In the event of any accusations / disclosures being made the following procedure is instigated:

1. The person to whom the accusation/disclosure was told / who has suspicions should make a record, on a Safeguarding Form (according to the guidelines attached to that form) and relate it at the earliest possible opportunity to the Protection Officer.
2. The Safeguarding Officer will, if necessary call the Multi Agency Support Hub, the parents of the holiday maker concerned, police, Children and Family Services, Local Authority Designated Officer and / or other relevant authorities to hear the accusations/disclosures and act upon them.
3. Action thereafter will be based on the Safeguarding Officer's appraisal, in discussion with his/her deputy and the relevant services, of the severity of the incident, the number of holiday makers involved and other relevant factors. Possible immediate action includes:
 - a. Suspension of the accused from all interaction with the holiday maker making the accusations and from all one-to-one care, pending further investigation.
 - b. Suspension of the accused party from all OMH activities, pending further investigation.
4. The holiday maker(s) will have the opportunity to leave OMH activities and return to their home immediately if they wish.
5. In the event of the accused party being the safeguarding Officer, the deputy Safeguarding Officer will adopt their role.
6. The outcome of this process may include a report being made to the Disclosure Barring Service regarding the accused volunteer.
7. A record of the allegations made, details of follow-up and resolution, of action taken and decisions reached is made under the jurisdiction of the Protection Officer. This is made available to the volunteer concerned and held on file indefinitely, as per our Data Storage Policy.
8. Where required under Schedule 5 Events and Notifications, Ofsted will be informed.

Whistleblowing

All volunteers are informed of the OMH 'whistle-blowing' policy which is as follows:

- It is acknowledged that many holiday makers attending the OMH week may have limited ability to communicate their own concerns and that therefore all volunteers act in a position of advocate for the holiday makers' welfare.



- Any suspicions or concerns should be reported to the Safeguarding Officer immediately, including concerns about a holiday maker's well-being on arrival for the OMH week (i.e. signs of maltreatment occurring in the home prior to the holiday) or the behaviour of another volunteer whilst on the holiday.
- All reports will be treated with respect and the 'whistle-blower' is guaranteed complete confidentiality within our organisation.
- If suspicions turn out to have been unfounded the 'whistle-blower' is under no obligation to apologise for having raised a genuine concern.

Systems to ensure confidentiality

- Any accusations will initially be shared only between the accuser, the person in whom they confide and the Safeguarding Officer.
- Other parties will be permitted to know the details of the accusation only if this knowledge is essential to make a suitable response to the accusations. e.g. police officers, senior OMH volunteers.
- Any volunteer who raises a concern about another member of OMH personnel is guaranteed complete anonymity within the group.

A note on the status of young volunteers

Volunteers on the holiday are all aged 17 years old or over. Since some on the Summer Holiday are 17, child protection issues are relevant for these individuals as well. All volunteers on the holiday are entitled to the same safeguards, standards of support and treatment in the event of an accusation as one of our vulnerable holiday makers. In the (usual) situation where a young volunteer is also a current pupil, the host school representative would refer to the school's Child Protection and Safeguarding policy for guidance. Likewise, matters involving a current pupil would be referred to the host school's child protection officer at the earliest available opportunity.

A note on visitors to the holiday

- All visitors to the OMH holiday are required to sign in with a member of the senior team.
- All visitors to the OMH holiday are required to wear a name badge during their visit.
- No visitors to the OMH holiday are ever permitted to take one-to-one responsibility for a holiday maker, even in a public place.

A note on shared bedrooms

During the holiday, depending on available accommodation, some holiday-makers may share dormitory-style bedrooms (e.g. two holiday makers with two helpers) and some may share bed-sit style rooms (e.g. one holiday-maker with one helper). The latter case affords an opportunity for greater independence and dignity. Volunteers who are 17 years old will not have responsibility for holiday makers overnight. It is usually considered essential for holiday-makers to share a bedroom with a member of staff due to factors such as: requirement for supervision of medical conditions (e.g. epilepsy) and need for support in the night (e.g. visiting the bathroom). Indeed most holiday-makers enjoy sharing a room and the support and companionship this affords when away from home. On occasion there may be opportunities for older, more mature holiday makers to share with another holiday maker or have their own bedroom – if this happens, decisions will be made in consultation with the holiday maker and their family. In these cases a volunteer will be available in a room close by. Nevertheless we constantly monitor the situation regarding shared/individual bedrooms considering factors such as:

- Whether holiday-makers sharing a bedroom one-to-one are able to communicate to staff if they are not happy in that situation for any reason



- Whether holiday-makers sharing a bedroom one-to-one are benefitting from the experience or require more independence instead
- The medical and support needs of each holiday-maker
- Each holiday-makers experience being away from home
- The skills and experience of helpers in one-to-one bedrooms.

Preventing radicalisation

Members of OMH senior team know how to recognise and respond to any behaviour that could link to radicalisation/extremism. Our Children and Young Persons Police Officer – CYPO is the first point of contact and any OMH personnel or holiday maker's behaviour that may point to radicalisation/extremism are discussed with the CYPO immediately. If unavailable to call 101. If travel abroad is suspected / immediate threat members of the senior team are aware to call 999 and they also have access to the confidential anti-terrorist hotline 0800789321.

Our trained PREVENT lead is Anna Clish. All OMH personnel are aware of the PREVENT agenda.

FGM (female genital mutilation)

OMH recognises the areas where FGM is prevalent and will work in partnership with agencies to safeguard any child at risk of FGM. The designated safeguarding lead understands this is classed as child abuse in the UK and will report any risk to 101 immediately.

Other issues

OMH personnel are instructed to report any concerns they may have that a holiday maker may have issues with gambling and social gaming, peer on peer abuse, bullying via social media, be a victim of racist / homophobic /trans phobic incident, identify as trans genders, be at risk of human trafficking, modern slavery, domestic violence and abuse, forced marriage or honour based violence.

OMH are aware of current media attention regarding the possibility of allegations of historic abuse within education – 'Everyone's Invited'. Any concerns raised regarding this by ex-pupils will be redirected to the appropriate authorities.



The Designated Senior Member of staff for Safeguarding (Child Protection) / Designated Safeguarding Lead (DSL) is: Kate Taylor

Contact Details:

Oundle School Mencap Holiday: Kate Taylor – 07801187103

Oundle camping: Kate Taylor – 07801187103

The Deputy Designated Safeguarding Lead is: Anna Clish

Contact Details:

Oundle School Mencap Holiday:

Anna Clish – 07252 331872

Oundle camping: Anna Clampin – 07450 208266

Ally Itani – 07944 973227

The named PREVENT lead is: Anna Clish

The named CSE lead is: Kate Taylor

The named FGM lead is: Kate Taylor

The named on-line protection officer is: Anna Clish

The named complaints handler is: Kate Taylor

The Registered Manager is: Kate Taylor

Contact Details: 07801187103

The Local Authority Designated Officer (LADO) is:

Designated Officer Administrator - 01604 364031

Designated Officer Andy Smith - 01604 367862

Designated Officer Christine York - 01604 362633

MASH Team:

Contact Details: 0300 126 7000



Mobile Device Policy

Policy Statement

At Oundle Mencap Holidays the welfare and well-being of our holiday makers is paramount. The aim of the Mobile Phone Policy is to allow users to benefit from modern communication technologies, whilst promoting safe and appropriate practice through establishing clear and robust acceptable mobile user guidelines. This is achieved through balancing protection against potential misuse with the recognition that mobile phones are effective communication tools. It is recognised that it is the enhanced functions of many mobile phones that cause the most concern, offering distractions and disruption and which are most susceptible to misuse – including the taking and distribution of indecent images, exploitation and bullying. However, as it is difficult to detect specific usage, this policy refers to ALL mobile communication devices.

This policy applies to all individuals who have access to personal mobile phones on site. This includes staff, volunteers, proprietors, children, young people, parents, carers, visitors and contractors. This list is not exhaustive.

This policy should also be read in relation to the following documentation:-

- Safeguarding Policy
- Behaviour and Anti-bullying Policies
- Media policy

Our aim is therefore that all volunteers:-

- Have a clear understanding of what constitutes misuse
- Know how to minimise risk
- Avoid putting themselves into compromising situations which could be misinterpreted and lead to possible allegations
- Understand the need for professional boundaries and clear guidance regarding acceptable use
- Are responsible for self-moderation of their own behaviours
- Are aware of the importance of reporting concerns promptly.

It is fully recognised that imposing rigid regulations on the actions of others can be counterproductive. An agreement of trust is therefore promoted regarding the carrying and use of mobile phones within the setting, which is agreed to by all users.

Personal Mobiles

Volunteers

Volunteers are discouraged from making/receiving calls/texts during contact time with children (unless this is communication with group leader for safety purposes)

- Use of phones (including receiving/sending texts and emails) should be limited to non-contact time when no children are present e.g. when on a break.
- Volunteers must security protect access to their phone.
- Volunteers are not at any time permitted to use recording equipment on their mobile phones, for example: to take recordings of children, or share images. Legitimate recordings and photographs should be captured using OMH equipment such as cameras, ipads or OMH phones.
- Volunteers should report any usage of mobile devices that causes them concern to the holiday leader / safeguarding lead.

Mobile Phones for holiday related purposes

We recognise that mobile phones provide a useful means of communication on off-site activities. However, volunteers should ensure that:-

- Mobile use on these occasions is appropriate and professional (and will never include taking photographs of children)
- Mobile phones should not be used by volunteers to make contact with parents – all relevant



communications should be made via the Holiday lead team.

Holiday makers

We recognise that mobile phones are part of everyday life for many children and that they can play an important role in helping children to feel safe and secure. However, we also recognise that they can prove a distraction and monitoring the content that holiday makers are able to access via mobile data is impossible to implement.

Therefore Children who wish to bring their mobile phones on a holiday may do so if they wish, but there are some rules and reminders, which must be observed. Oundle Mencap Holidays will provide a wifi passcode if required and use of this will be expected, as we are unable to take responsibility for any content children may access via their own mobile data. Children will also be reminded not to use their devices to record other holiday makers or volunteers.

Whilst we will endeavour to look after these phones, OMH takes no responsibility for any accidental loss or damage to mobile phones brought onto holidays.

Everything must be clearly named.

Where mobile phones are used during a holiday to bully or intimidate others or to access inappropriate content then the holiday leader has the power to intervene to such an extent as it is reasonable to regulate the behaviour of holiday maker.

Parents will be asked to sign a disclaimer for any mobile devices and their use brought onto a holiday by their child. This will include what they wish to happen to mobile devices overnight. It is recommended that devices are stored centrally overnight.

Volunteers, Visitors, Proprietors, Advisers and Contractors

All Volunteers, Visitors, Proprietors, Advisers and Contractors are expected to follow our mobile phone policy as it relates to staff whilst on the premises. On arrival, such visitors will be informed of our expectations around the use of mobile phones.

Parents

While we would prefer parents not to use their mobile phones while on OMH premises, we recognise that this would be impossible to regulate and that many parents see their phones as essential means of communication at all times. We therefore ask that parents' usage of mobile phones whilst on the OMH site is courteous and appropriate to the environment. We do allow parents to take photographs or video using their mobile phones – but insist that parents do not publish images (e.g. on social networking sites) that include any children other than their own. Parents/carers are reminded of this at the start of every holiday.

Dissemination

The mobile phone policy will be shared with volunteers as part of their induction. It will also be available to parents via the OMH website.

If a holiday maker wishes to contact parents, the holiday lead team will facilitate this as appropriate.



Emergency Lockdown Policy

Policy Statement

Oundle Mencap Holidays will adopt the emergency Lockdown policy for the host establishment. This will outline Oundle Mencap Holidays response to an emergency (unspecified) and how we intend to safeguard children and volunteers. Clearly we would hope that we would never have to operate such a lock down but should the need arise the procedures are outlined.

It is important that volunteers understand these procedures and are able to follow clear instructions should an emergency occur.

Oundle School Emergency Lockdown procedure:

	Purpose	During lesson time	Outside lesson time
Recall to House	Important announcement needs to be made simultaneously to all pupils	<ul style="list-style-type: none"> • Email to all staff - teaching and non-teaching • Phone call to Music Dept/Stahl • Consider LJS • Clear instruction for all pupils to go; <ul style="list-style-type: none"> ○ straight back to House ○ back to House at end of lesson ○ back to House at start of break • Ask staff to check their building/department for staff who have not received instruction • Staff to calm situation and reassure. • Hsms to account for whole house • Hsms/Deputies to expect to receive instructions from Head/SMT 	<ul style="list-style-type: none"> • Consider activities and venues; <ul style="list-style-type: none"> ○ Sports ○ Vols ○ Music ○ Drama ○ Evening lectures • Email/phonecalls • Tour playing fields informing coaches/Phone groundstaff • Phone Groundsmen and ask them to clear playing fields • Hsms to account for whole House • Hsms/Deputies/Matrons to receive instructions from Head/SMT for Houses
Lock down in situ	Emergency in town, violence, terrorism	<ul style="list-style-type: none"> • Email to all staff - teaching and non-teaching • Phone calls to Music Dept/Stahl • LJS • Staff informed that lock-down required for pupil safety. • Ask staff to check their building/department • Pupils to be kept in teaching rooms until all clear. • All departments have locked outside doors except Cloisters • Cloisters gates/stair doors to be locked? • Pupils to be kept calm. • Staff asked to keep email open and wait for further instruction. 	<ul style="list-style-type: none"> • Consider activities and venues; <ul style="list-style-type: none"> ○ Sports ○ Vols ○ Music ○ Drama ○ Evening lectures • Assistance required • Email all staff, phone calls • Instruct staff to retain pupils inside in a safe place until all clear • Doors locked as appropriate • Staff asked to keep email open.

PSCK April 2016



Crisis communication plans

- Each boarding house and venue visited by OMH will have its own '**Contingency and Evacuation Plan**' and will have undergone a rigorous risk assessment, but in crisis situations issues need to be escalated to the Holiday Management Team and Safeguarding Lead for effective communication, both internal and external.
- If necessary, further members of the OMH senior team can be made available to assist.

Quick Reference Guide

Full detail offered below in document.

1. Management, plus others as necessary, meet in person. Holiday Leader, or appointed proxy, to inform next of kin, and public statement prepared.
2. Written public statement offered to enquiries from media, on a reactive basis only. Uploaded to OMH website if published elsewhere.
3. No OMH staff to be offered as a single spokesman on behalf of the charity.
4. House Leaders to inform OMH staff en masse as soon as possible. Remind to not engage with anyone outside of the holiday on the issue, to not post to social media and to refer any queries to House Leaders.
5. Senior Team to continue to meet regularly to update/amend communications strategy if required.

Background

In exceptional cases it will be necessary for the senior team at OMH to make quick decisions on a communications strategy, both external and internal. Instances where this would be required include, but are not limited to:

- Any RIDDOR or potential RIDDOR reportable incident;
- Death, or serious injury of a holiday maker(s) or member(s) of staff;
- Substantial fire in an Oundle School venue being utilised by OMH;
- Loss of a child or vulnerable adult for any significant period of time and/or involvement of emergency services in the incident;
- Forced removal of any member(s) of staff, if it requires the emergency services and/or is likely to create any adverse publicity for OMH;
- Involvement of the emergency services in any significant issue on, or related to, OMH;
- Any other issue likely to lead to significant adverse publicity for OMH.

It is impossible to think of every crisis scenario that OMH could face, but this plan should offer a framework for effective communication, both internal and external. The aim of this plan will be to minimise the risk of escalation, or misreporting, of any incident relating to OMH.

Crisis Communications Procedure at Management Level:

Once an issue has been escalated to the management team, the following procedure will be in



place. In almost all instances, the OMH policy will be to not proactively engage with the media, however, in some instances reactive engagement may be required:

- Management team (Holiday Leader, House Leaders, Medical Liaison) will meet;
- If required, relevant senior team members will be asked to join;
- The senior team will decide on any comments or reaction for the media. For clarity, this should preferably be offered in the form of a written statement;
- It may be necessary to inform members of staff from Oundle School (if the incident directly relates to OS property). They should not take any active involvement if the incident relates to any personnel connected with OMH.
- Senior team to meet regularly to update on agreed communications strategy, as necessary.

Communication with the media:

Communication with the media should be done in a considered and agreed, but swift, manner. Due to the volunteer-run nature of the charity, **no member of the team should be offered as a spokesman.**

On the instance of death, or serious injury of a holiday maker(s) or member(s) of staff, contact to the next of kin should be treated as a priority. Reaction to any media requests, however, should also be made swiftly to avoid undue speculation or false reporting.

- Any comment made be in the form of an agreed, written statement.
- Requests for broadcast (radio/television) should not be taken, and a written statement offered.
- Any further media requests should, in the first instance, be referred back to the written statement.

Online Updates:

Once agreed, and if publicised previously, the agreed statement from the senior team should be made available on the OMH website (www.oundlemencap.co.uk).

If the incident is serious enough to require an instant response to confirm OMH is dealing with the issue(s) variations, as appropriate, of the following messages can be put out on twitter, from OMH:

“We are aware of XXX and are dealing with the situation/incident/events [at xxx venue] and will provide a further update as soon as we can.”

- In the most extreme cases an emergency contact number may need to be provided.
- At no point should any member of staff post or comment on the incident via personal social media platforms.

Internal Communication for OMH staff:

The House Leaders will be responsible for delivering any internal communications required to OMH with agreement from the Senior Team. This will most likely occur via a group meeting at



the earliest available opportunity.

Staff must be reminded to:

- Refer any questions from members of the public regarding the incident to House Leaders.
- Not to post anything related to the incident onto their social media.
- Not to engage with any media and to refer them to House Leaders for comment.