



CHIPS Policies

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CHIPS

POLICIES AND PROCEDURES

Revised September 2021

All CHIPS policies are reviewed annually by the Executive Committee of Trustees, commencing at the beginning of each year. Any changes agreed by the Board of Trustees will be ratified at the next Annual General Meeting.

DEFINITIONS USED:

- Staff refers to a paid member of CHIPS staff
- Playleader means the staff member with overall responsibility for a playscheme
- Volunteer means unpaid helper
- Adult means a person aged over 18 years
- Parent refers to a person with parental responsibility or a principle carer

ELIGIBILITY CRITERIA

We cater for children aged 3-15 years from East Herts District Council area and the Borough of Broxbourne at our playschemes. Children from Hertfordshire may be considered for specified other activities as per their Short Breaks Local Offer eligibility criteria and the criteria for that group.

We welcome families with a child or children: -

1. Whose special needs limit their participation in social and leisure activities.
2. Or whose care needs limit their siblings opportunities.
3. Or who need significant extra physical care from their parents.
4. Aged 16-19, who are known to CHIPS, and who present no health and safety issues and for whom the parents and Playleader agree that a playscheme is still appropriate.

Both the child with special needs and any brothers and sisters of a suitable age will be welcome on the schemes.

Children who exhibit behavioural emotional difficulties not arising from their disability will not normally be considered.

Children whose behaviour despite 1:1 supervision, poses a significant risk to themselves or others on the scheme and may have to be asked to seek alternative care.

Parents of children, who have attended CHIPS for more than 3 years before their families move out of area, may ask the Trustees to consider their continued attendance. Consideration will only be given if the Playleader agrees that it is in the child's best interest and funding is available from the new area.

In certain cases, at the discretion of the Playleader, it may be possible to consider children whose parents have significant special needs making it difficult for them to access other groups for their children, if this would be in the child's interest.

Children of staff and adult volunteers attending scheme

Children whose parents help on the scheme may attend when their parents are present at the discretion of the Playleader, once they have completed their probationary period. The child will be able to attend so long as the staff member/volunteer and other members of the CHIPS team are able to fulfil their duties effectively whilst the child attends.

If the young person begins coming to scheme with their parent, they will do so for an initial 3 months trial to ensure that the arrangement is working for everybody concerned, including the child. At the end of this trial, the staff member/volunteer will meet with the playleader or other management representative to discuss.

If the child of the staff member or volunteer has additional needs and is on our waiting list, they may attend when their parent or carer is working at CHIPS, with the agreement of the playleader, and after they have completed their probationary period. Once the child reaches the top of the waiting list, they will then be allocated sessions by the scheme Leader, in their own right, and can attend without their parent or carer.

Children of sufficient age, ability and maturity to act as volunteers may attend at the discretion of the Playleader.

All new children will be offered a trial session before starting on a scheme to see whether the scheme is suitable for them.

Children attending CHIPS services funded by our Hertfordshire County Council contract must be registered for the Short Breaks Local Offer.

ADMISSIONS POLICY

CHIPS will try to make all activities accessible to as many families as possible who fulfil the eligibility criteria for that group.

CHIPS will operate a waiting list should numbers make this necessary. This will be prioritised according to need at the discretion of the Trustees and the Playleader. Days would be divided between the children requesting places, with allocation varying according to availability. The basis of the allocation will be explained to families.

Extra sessions at CHIPS' playschemes may be offered during short-term family crises (e.g. illness of a parent or birth of a new baby).

In case of emergencies, and the child(ren) are not booked in, CHIPS will always do their best to offer a child a place on the scheme for that day(s). Families will be encouraged to notify us in advance if a booked place is not required. Families who repeatedly miss sessions without explanation will be given lower priority in future allocations.

CHIPS will consult with families about changes to session times to avoid excluding anyone.

CHIPS will be flexible about how families use the scheme so as to accommodate the needs of individual children and families.

CONFIDENTIALITY POLICY

CHIPS will respect confidentiality in the following ways:

Parents will have access to the files and records of their own child but will not have access to information about any other child.

Staff may discuss or share records about an individual child with other staff or volunteers working with that child, Ofsted, Hertfordshire County Council (where explicit permission is given as part of the young person's Short Break Local Offer Allocation) and the child's parents but with no one else, without express permission. Sensitive personal information about the child will not be discussed with anyone else, unless that info is considered to put a child at risk, in which case it would be shared with appropriate agency.

Staff and volunteers must not exchange information about children or incidents outside of the CHIPS setting- such as by social networks or text messages. Staff who do exchange information about a child outside CHIPS, and are not authorised to do so, may face disciplinary action.

Any anxieties/ evidence relating to a child's personal safety will be kept in a confidential file and will not be shared within the group except on a need to know basis.

Issues to do with employment of staff will remain confidential to those directly

involved in personnel decisions.

All staff and volunteers will be advised of our confidentiality policy and required to respect it.

All the above undertakings are subject to the paramount commitment of CHIPS to the safety and well being of the child.

SAFEGUARDING POLICY

Safeguarding Statement of Intent and Aims of Policy

The safety of all the children in the care of CHIPS, is paramount regardless of age, ability, religion, gender, race, ethnicity, sexual orientation or circumstances.

Aims

1. Protecting children from maltreatment
2. Prevent impairment of children's mental and physical health and development
3. Ensure that children grow up in circumstances consistent with safe and consistent care
4. Take action to enable all children to have the best outcomes

Definition of child abuse (NSPCC)

Child abuse is when a child is intentionally harmed by an adult or another child – it can be over a period of time but can also be a one-off action. It can be physical, mental, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention – this is neglect.

CHIPS staff, volunteers and trustees will strive to create in our groups an environment in which children are safe from abuse and in which any suspicion of abuse will be responded to promptly and appropriately in line with current guidelines from the Hertfordshire Safeguarding Children Partnership (HSCP) and UK Government guidelines on Working Together to Safeguard Children 2018. Keeping Children Safe in Education revised and published on 1st September 2020 should be read with Working Together to Safeguard Children.

<https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safeguarding-Children-Partnership/hscp.aspx>

www.workingtogethertosafeguardchildren.gov.uk

www.keepingchildrensafeineducation.gov.uk

Working for CHIPS

CHIPS will exclude all known child abusers.

It will be made clear to all adult applicants for all positions within CHIPS, both staff and volunteer applicants, that the position is exempt from the provision of the Rehabilitation of Offenders Act 1974.

All adults and young volunteers from age 16 will have a Disclosure and Barring Service (DBS) check carried out by the CHIPS Administrator before they will be allowed to work at CHIPS. Any discrepancies on the DBS will be discussed with candidate and a decision made by trustees on whether that person is a suitable person to work with Children with disabilities at CHIPS. If there is any suggestion of risk the individual will not be appointed.

All adult applicants for staff or volunteer positions will be interviewed before an appointment is made.

All applicants will be asked to provide two independent references including their current or most recent employer or educational establishment. For young volunteer applicants this will include a school reference. All such references will be taken up.

In the case of applicants with unexplained gaps in their employment history or who have moved rapidly from one job to another, explanations will be sought.

All staff and adult volunteers will be expected to complete basic safeguarding training and Prevent training; young volunteers will be offered basic awareness of safeguarding.

There will be no smoking, drinking alcohol or drug-taking and staff will not work under the influence of such substances.

Staff and volunteers will not work if they are on medication which may affect their ability to care for CHIPS children.

Staff will have a 12 session probationary period – where Saturdays count for 1 session a day, and holidays counting for 2 sessions.

Prevent abuse by means of good practice

Children will be encouraged to develop ways of making choices and expressing their feelings to help them resist inappropriate approaches. However staff/volunteers will be aware that many of the children are very vulnerable because of their special needs. They will work together to ensure that situations with a potential for abuse do not arise, as far as possible. Children will be valued and listened to. A child will be classed as anyone aged 20 or below and under 18 for young volunteers.

Each playscheme will have staff trained in STEPS procedures. Force will not be used to control or restrain children except if the child in imminent danger

of harm. Individual Behaviour plans will minimise likelihood of challenging behaviour.

Risk assessments will be carried out daily by each playscheme, to ensure the safety and exclude potential dangers. Trustees conduct regular detailed checks.

Staff and volunteers will not be left alone with any child or children for more than very short periods. An adult, who needs to take a child into a quiet room e.g. after a seizure, will leave the door ajar and be regularly checked by the Playleader or senior member of staff.

Staff or volunteers will not change or help children go to the toilet without a second member of staff or volunteer being present; at least one person must be a staff member. Please refer to Intimate Care Policy in this document.

Parents will always be welcome to stay for any part of a session although CHIPS does in general encourage parents to take their respite.

CHIPS will promote British Values: Individual Liberty and Freedom for all, Mutual respect and Tolerance, Democracy i.e. making decisions together, Rule of Law i.e. understanding that rules matter.

For E-Safety - please refer to CHIPS E- Safety policy in this document

Touching

When touching a child, staff and volunteers should always be aware of the possibility of invading a child's privacy and should respect their wishes and feelings. Such actions can be misconstrued if taken out of context. Both staff and volunteers must be alert to this possibility.

Not all children feel comfortable with certain types of physical contact; this should be recognised and, wherever possible, adults should seek the child's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed.

Staff should acknowledge that some children are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the child.

There are occasions when staff will have cause to have physical contact with individuals for a variety of reasons, for example:

- To comfort or reward a young person
- For affirmation/praise
- To direct or steer a young person

- **For activity reasons (for example in drama, physical games)**
- **First aid and medical treatment.**
- **In an emergency to avert danger to the child.**

However touch is important in guiding, comforting, communicating with and encouraging a **child in line with the Behaviour Management policy**. Therefore CHIPS does not have a 'no touch policy', but all staff and volunteers are encouraged not to allow children to be carried, cuddled or held on laps. It is paramount that touch is there for the benefit of the child and NEVER for the benefit of the staff member or volunteer.

Allegations/concerns against staff and volunteers

The name and contact details of the Designated Safeguarding Leads (DSL) will be available to all parents, staff and volunteers if they have any anxieties about the running of a playscheme.

Parents will be encouraged to voice concerns in the first instance with the Playleader as soon as appropriate, unless that person is implicated. We ensure that all parents know how to complain about staff or volunteers, which may include child abuse. The complaints procedure is available at all schemes and is on our website.

The primary concern of the CHIPS Trustees, staff and volunteers must always be the safety of the children including young volunteers.

We follow the guidance of the HSCP when investigating and recording any complaint that a member of staff or volunteer may have abused a child. This will include reporting to the Local Authority Designated Officer (LADO), within one working day, all allegations that a child has or may have been harmed or that a criminal offence may have been committed involving a child, whether or not it is believed to be valid. CHIPS will share information with other agencies as appropriate and for the benefit of the child.

We acknowledge that referral to the LADO may result in various outcomes including: no action if manifestly untrue, referral back to CHIPS disciplinary or complaints procedure, Social Care investigation and Police investigation.

We will suspend staff or volunteers during the process if formal Social Care or Police investigation is instigated.

We will follow up all allegations and will not enter into any compromise agreements involving resignation.

We will seek to identify appropriate support for any child and family involved in the allegation.

Child Protection

Statement of Intent

CHIPS is committed to responding promptly and appropriately to all incidents or concerns of abuse that may occur and to working to the guidelines and procedures set out in the Working together to Safeguard Children 2018 document and HSCP Manual of Procedures- see previous web sites.

Recognising and Responding to Suspicions of Abuse

We acknowledge that abuse of children can take different forms – physical, mental, emotional, sexual and neglect.

When children are suffering from abuse or neglect, this may be demonstrated through changes in their behaviour or in their play. Where such changes in play or behaviour occur, CHIPS will record and respond appropriately. It will not be assumed that any new behaviours will inevitably be due to a child's disability and consideration will be made to the possibility of behaviour changes being due to harm being done to the child.

Any incident will be reported to Hertfordshire County Council Children Services via the current 'Events and Notification Procedure Form' or online on the HSCP website or if an urgent enquiry phone 0300 123 4043

www.hertfordshire.gov.uk/childprotection

We recognise that we have a duty to refer to HSCP if there are signs that a child is or is likely to suffer abuse and/or neglect. We will allow any investigation to be carried out with sensitivity. Staff will take care not to influence the outcome either through the way they speak to the child or ask the child questions. If there are concerns, parents are normally the first point of contact. If a suspicion of abuse is recorded, parents are informed at the same time as the report is made, except where guidance of the HSCP does not allow this. This will usually be the case where the parent is the suspected abuser. In this case the investigating officer will inform parents.

We will also follow HSCP procedures for concerns regarding Domestic Violence, Child Sexual Exploitation, Female Genital Mutilation or abuse by a child. See previous HSCP website.

Radicalisation concerns will be reported according to the HSCB Procedures

Keeping Records

Whenever worrying changes are observed in a child's behaviour, physical condition or appearance or a child makes a disclosure of possible abuse, a specific and confidential record will be set up by the Playleader. This will be quite separate from the usual ongoing records.

This record will include:

- Name, address and date of birth of the child
- Timed and dated observations, describing objectively the child's behaviour/appearance without comment or interpretation.
- The exact words spoken by the child
- All observations and written records must be accurate and clearly distinguishing between fact and opinion
- The dated name and signature of the observer
- The names of any other person/s present
- Action taken

Provide Training

CHIPS will seek out regular training opportunities for all staff members to ensure that they recognise the signs and symptoms of possible physical and mental abuse, neglect, emotional and sexual abuse including Female genital mutilation and risks of radicalisation, and also that they are aware of the Local Authority guidelines for making referrals.

Designated Safeguarding Leads will undergo refresher training every year and ensure they remain up to date with current information.

CHIPS ensures that all staff members know the procedures for reporting and recording their concerns.

CHIPS will ensure all staff and volunteers are aware of the vulnerability of children with disabilities, there may be peer group isolation, they are disproportionately impacted by bullying but may not show this, and many are impacted by difficulties with communication, and assumptions that behaviours are only due to their disability.

When an allegation is made by a child CHIPS will ensure all staff members understand the importance of listening and reassuring without prompting and of recording the allegation verbatim and never giving promises that it will be kept secret.

All staff will be expected to attend this training and keep updated.

The Playleaders for each scheme, the Safeguarding lead, and members from the executive committee have attended the Prevent Awareness training and are able to provide advice and support to staff.

All staff members are advised to complete the Prevent Duty Awareness online course as part of their induction at CHIPS.

Confidentiality

All suspicions and allegations are kept confidential and shared only with those who need to know. This will include the Playleader and Designated

Trustee for Child Protection. Any information is shared under the guidance of HSCB, in the best interests of the child.

Support to families

CHIPS makes every effort in its power to build trusting and supportive relationship among families, staff and volunteers within each scheme.

CHIPS continues to welcome the child and family whilst investigations are being made in relation to suspected abuse in the home.

Confidential records kept on a child are shared with the child's parents or those with parental responsibility for the child, only if appropriate and under the guidance of the HSCB.

With the proviso that the care and safety of the child is paramount, we will do all in our power to support and work with the child's family.

SERIOUS INCIDENTS REPORTING PROCEDURES

All serious incidents must be reported to the Safeguarding Lead and CHIPS Co-ordinator on the day of the event and initially urgently referred to Hertfordshire Child Protection on the phone number: 0300 123 4043.

This will be followed up by a paper or online referral.

In cases of immediate danger a 999 call will be made.

BEHAVIOUR MANAGEMENT POLICY

CHIPS aims to work towards a situation in which children can develop self-discipline and self-esteem in an atmosphere of mutual respect and encouragement. Our behaviour management policy is aimed at improving positive experiences by promoting and supporting their engagement with CHIPS.

Behavioural difficulties may signal a need for support and it is essential to understand what the underlying causes are. For example, a child or young person may exhibit such behaviours as a result of a medical condition or sensory impairment, previous trauma or neglect, or be exacerbated by an unmet need or undiagnosed medical condition. Behavioural difficulties may also reflect the challenges of communication, or the frustrations faced by children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties - who may have little choice and control over their lives. Children and young people with behavioural difficulties need to be regarded as vulnerable rather than troublesome and schools have a duty to explore this vulnerability and provide appropriate

support.

Behaviour that escalates and becomes difficult or dangerous may result from the impact of a child or young person being exposed to challenging or overwhelming environments, which they do not understand, where positive social interactions are lacking, and / or personal choices are limited. Children and young people exhibiting difficult or dangerous behaviours need support and differentiation of teaching and learning to have their needs met and to develop alternative ways of expressing themselves that achieve the same purpose but are more appropriate.

We use behaviour analysis to understand children and young people's needs and the causes of poor emotional wellbeing.

By anticipating situations that may cause distress, and agreeing the steps to address them, whilst assessing, managing and reducing risk it is possible to reduce the use of restraint or restrictive intervention.

We aim to reduce restrictive practices by the proactive use of risk reduction plans drawn up with the involvement of the child(ren) (or young person) and their parents. Co-produced risk reduction plans aim to better understand the experiences of parents and children as well as the agree the steps that should be taken to avoid escalation and promote emotional wellbeing.

Our Behaviour policy sets out the steps we will take as a school to ensure that we comply with the provisions of the Equality Act 2010.

Group routines and the behaviour expected of children will be discussed and agreed by the group and explained to all newcomers both adults and children.

All staff and volunteers will try to ensure that children conform to group routines so they have the security of knowing what to expect and can develop their social behaviour.

Staff and volunteers will provide a positive model for the children with regard to friendliness, care, courtesy and respect.

Staff and volunteers will praise and endorse desirable behaviour such as kindness and willingness to share. CHIPS will take positive steps to 'catch children getting it right' to avoid a situation in which children receive attention only in return for undesirable behaviour.

CHIPS staff will promote positive behaviour, internal discipline and respect for others.

Prosocial behaviour	Staff response
Sharing an activity with another child	Staff will give a positive verbal

	response Script “Well done for sharing.”
Holding the door open for another person	Staff will give a positive verbal response if they are walking through the door Script “Thank you for holding the door open, that’s very helpful.” If the staff member is not the person walking through the door they will give a positive non-verbal response – eye contact and a thumbs up.

CHIPS will ensure staff understand how to focus on de-escalation and preventative strategies rather than focusing solely on reactive strategies.

For example:

Behaviour	Response from staff
Swearing (not directed at a person)	Verbal reminder that we do not use that language at CHIPS Script “We don’t say that word when we are here. You can say(insert appropriate alternative for expressing whatever feeling) instead.”
Swearing (directed at a person)	Script “That language is not appropriate, and it is hurtful.” Educational consequences will be put in place and the child supported to make a meaningful apology. Educational consequences will be put in place and the child supported to be able to communicate their feelings in a more appropriate manner.

When children behave in inappropriate ways:

Physical punishment such as smacking or shaking will never be used or threatened.

Children will never be sent out of the room by themselves.

Techniques to single out and humiliate an individual child such as the ‘naughty chair’ will not be used.

Staff or volunteers will not shout or raise their voices in a threatening or intimidating manner.

Children will be given 1:1 support in seeing what was wrong and working towards a better pattern of behaviour.

Reflect, repair and restore when the young person is calm relaxed and reflective.

Explore what happened.

Explore what people were thinking and feeling at the time?

Explore who has been affected and how?

Explore how we can repair relationships?

Summarise what we have learnt so we are able to respond differently next time?

In cases of serious misbehaviour, such as violence or sexual play, the unacceptability of this will be communicated immediately and in an appropriate way to the child. It will be discussed with the child's parents by the Playleader and be recorded on an incident form. Support for the child will then include protective and educational consequences and risk reduction plan.

In any case of misbehaviour, it will always be made clear to the child or children in question that it is the behaviour and not the child that is unwelcome.

Any behaviour problems will be handled in a developmentally appropriate fashion, respecting the individual child's level of understanding and maturity.

Staff and volunteers will be aware of the kinds of behaviour arising from a child's special needs and families will be encouraged to share information on a child's development, or current behavioural difficulties outside of CHIPS. Recurring problems will be tackled by the whole group in discussion with the child's parents, with the aim of ensuring a consistent and appropriate response by all carers.

Where recurring difficult behaviour occurs, CHIPS will follow the STEPS proforma guidelines and produce for the young person:

- Roots and fruits analysis
- Anxiety mapping
- Individual Risk Management plan

When The Use Of Physical Interventions May Be Appropriate In CHIPS

Physical Interventions will be used for de-escalation when all other strategies have failed, and therefore only as a last resort. There are times when physical intervention is appropriate in day to day behaviour management and these are detailed in our 'Acceptable forms of physical intervention at CHIPS' section on the next page. All staff should focus on de-escalation and preventative strategies rather than focusing solely on reactive strategies. However there are other situations when physical handling may be

necessary, for example in a situation of clear danger or extreme urgency. Certain young people may become distressed, agitated, and out of control, and need calming with a brief Physical Intervention that is un-resisted after a few seconds.

The safety and well-being of all staff and young people are important considerations. Under certain conditions this duty must be an over-riding factor.

Physical intervention

CHIPS follows the Hertfordshire County Council led practice of STEPS training. STEPS is used in schools and settings across Hertfordshire and outlines the process of taking necessary steps to ensure that every young person is given an equality of opportunity to develop socially, to learn and to enjoy community life. STEPS gives our staff the skills and knowledge to promote prosocial behaviour and manage antisocial, difficult or dangerous behaviour, and to have an understanding of what behaviour might be communicating.

Physical intervention (supporting, guiding and escorting) will only be carried out by CHIPS Staff who have received STEPS training.

Physical intervention (supporting, guiding and escorting) may only be used where other possible alternatives such as calming and distracting have failed or where there is an imminent risk to the personal safety of any child or adult. This would normally just involve briefly guiding the young person according to staff training, until it is safe to give control back to the child. Rarely, it could be necessary for staff to exert a degree of direct force, in preventing a child inflicting significant injury. This will always be the minimum required, proportionate to the threat posed and used with due care for the safety of all involved. Physical contact will not be made with the young persons neck, breasts, abdomen, genital area or other sensitive body parts, or to put pressure on joints. If physical intervention is required on a regular basis, an Individual Risk Reduction plan will be written with the involvement of the young person's parents/carers. In the case of a child being injured by another child both parents will be informed of the incident and this will be recorded on the incident records.

Families of children whose behaviour, despite adhering to an agreed behaviour management plan, poses a significant risk to themselves or others on the CHIPS Playscheme, may have to be asked to seek alternative care. This measure will only be taken as a last resort.

Definition Of “Restrictive Physical Intervention”

“Restrictive Physical Intervention” (RPI) is the term used to describe

interventions where the use of force to control a person's behaviour is employed using bodily contact. It refers to any instance in which an adult authorised by CHIPS has to use "reasonable force" to control or restrain pupils in circumstances that meet the following legally defined criteria.

- To prevent a child from committing a criminal offence (*this applies even if the child is below the age of criminal responsibility*)
- To prevent a child from injuring self or others
- To prevent or stop a child from causing serious damage to property (*including the child's own property*)

There is no legal definition of "reasonable force". However, there are two relevant considerations:

- The use of force can be regarded as reasonable only if the circumstances of an incident warrant it.
- The degree of force must be in proportion to the circumstances of the incident and the seriousness of the behaviour or consequences it is intended to prevent.

The definition of physical force also includes the use of mechanical devices (eg splints on the pupil prescribed by medical colleagues to prevent self-injury), forcible seclusion or use of locked doors. It is important for staff to note that, although no physical contact may be made in the latter situations, this is still regarded as a Restrictive Physical Intervention.

Legal defence for the use of force is based on evidence that the action taken was:

- Reasonable, proportionate and necessary
- In the best interests of the young person

Unplanned interventions at CHIPS

In an emergency such as a young child running into a busy road, or a child or young person attacking a member of staff and refusing to stop when asked, then reasonable force may be necessary. This is defined as an unplanned intervention which: -

- requires professional judgement to be exercised in difficult situations, often requiring split-second decisions in response to unforeseen events or incidents where trained staff may not be on hand.
- will include judgements about the capacity of the child or young person at that moment to make themselves safe.

- requires responses which are reasonable and proportionate and use the minimum force necessary in order to achieve the aim of the decision to restrain.

An unplanned intervention should trigger a multidisciplinary discussion to look at what support is needed to reduce the likelihood of the situation occurring again. Staff should be updating and implementing a new risk reduction plan based on the circumstances of the unplanned incident.

We take the view that staff should not be expected to put themselves in danger and that removing other children or young persons and themselves from risky situations may be the right thing to do. We value staff efforts to rectify what can be very difficult situations and in which they exercise their duty of care for all children or young persons.

The circumstances when reasonable force may be used will need to meet the following legally-defined criteria:-

- To prevent a child or young person from committing a criminal offence (this applies even if they are below the age of criminal responsibility)
- To prevent a child or young person from injuring self or others
- To prevent or stop a child or young person from causing serious damage to property (including their own property)

Legal defence for the use of force is based on evidence that the action taken was:

- Reasonable, proportionate and necessary
- In the best interests of the young person

Staff should have reasonable grounds for believing that restraint is necessary to justify its use. They should only use restraint where they consider it is necessary to prevent serious harm, including risk of injury to the child or young person or others. Staff should use their professional judgement to decide if restraint is necessary, reasonable and proportionate.

Physical intervention must not become a habit between a member of staff and a child. Physical intervention should always be in the child's best interest.

Elevated risks

The following can result in a sense of violation, pain or restricted breathing

- The use of clothing or belts to restrict movement
- Holding a person lying on their chest or back

- Pushing on the neck, chest or abdomen
- Hyperflexion or basket type holds
- Extending or flexing of joints (pulling and dragging)

The following can result in significant injury:

- Forcing a child up or down stairs
- Dragging a child from a confined space
- Lifting and carrying
- Seclusion, where a person is forced to spend time alone against their will (requires a court order except in an emergency)

Acceptable Forms of Physical Intervention At CHIPS

- There are occasions when staff will have cause to have physical intervention with children for a variety of reasons, for example:
 - to comfort a child in distress (so long as this is appropriate to their age);
 - to gently direct a child;
 - First aid and medical treatment
 - in an emergency to avert danger to the pupil or pupils;
 - in rare circumstances, when Restrictive Physical Intervention is warranted.
- In all situations where physical contact between staff and pupils takes place, staff must consider the following:
 - the child's age and level of understanding;
 - the child's individual characteristics and history;
 - the duration of contact
 - the location where the contact takes place (it should not take place in private without others present).

Recording and reporting

The use of a restraint or restrictive intervention, whether planned or unplanned (emergency), must always be recorded as quickly as practicable (and in any event within 24 hours of the incident) by the person(s) involved in the incident, on a CHIPS incident form. The written record should include:

- the names of the staff and child or young persons involved;
- the type of restrictive intervention employed;
- where the incident took place
- the reason for using a restrictive intervention (rather than non-restrictive strategies);
- how the incident began and progressed, including details of the child's behaviour, what was said by all those involved, and the steps taken to defuse or calm the situation;
- the degree of force used, how that was applied, and for how long;
- the date and the duration of the whole intervention;

- whether the child or young person or anyone else experienced injury or distress and, if they did, what action was taken. Individual accident forms need to be completed if others have been hurt
- Include details of how the young person/staff member was after the incident
- Signatures required of leaders dealing with this and Parents signature proof that it was discussed with them. Any concerns raised immediately after this incident from Parents/Staff or children or any follow ups required need to be noted on the incident form and who is taking this action.

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BULLYING

CHIPS is committed to provide an environment for children that is safe, welcoming and free from bullying. Bullying of any form is unacceptable, whether the offender is a child or adult. The victim is never responsible for being the target of bullying.

Everyone involved in CHIPS, staff, children and parents, will be made aware of CHIPS' stance towards bullying. Such behaviour will not be tolerated or excused under any circumstances.

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

Emotional: Being deliberately unkind, shunning or excluding another person from a group or tormenting them. For example, forcing another person to be 'left out' of a game or activity or making fun of another person.

Physical: Pushing, scratching, spitting, kicking, hitting, biting, punching, taking or damaging belongings.

Verbal: Name-calling, put-down, ridiculing or using words to attack threaten or insult.

Psychological: Behaviour likely to instil a sense of fear or anxiety in another person.

Preventing Bullying Behaviour

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

behaviour will be.

Dealing with Bullying Behaviour

Despite all efforts to prevent it, bullying behaviour is likely to occur on occasion and CHIPS recognises this fact. In the event of such incidents, the following principles will govern the CHIPS response:

- All incidents of bullying will be addressed thoroughly and sensitively.
- Children will be encouraged to immediately report any incident of bullying that they witness. They will be reassured that what they say will be taken seriously and treated confidentially.
- In most cases, bullying behaviour can be addressed according to the strategies set out in the Behaviour Management policy. The bully will be encouraged to discuss their behaviour and think through the consequences of their actions. Where appropriate, they will be encouraged to talk through the incident with the other person concerned.
- When children bully we discuss what has happened with their parents and work out with them a plan for handling the child's behaviour.
- When children have been bullied, we share what has happened with their parents, explaining that the child who did the bullying is being helped to adopt more acceptable ways of behaving.

All incidents of bullying will be reported to the Playleader and recorded in the Incident Forms.

INTEGRATION POLICY

CHIPS aims to offer a range of activities to enable each child to participate and have fun.

CHIPS will offer co-operative group activities regularly to encourage the children to play together.

All children will be allowed and enabled to choose activities and will be encouraged to try different activities.

Children will be encouraged to participate in group activities but if they choose not to join in or to observe; this will be respected.

Activities accessible to only a specific group of children will not normally be chosen, although CHIPS recognises that few activities will appeal to all the

children. However we do apply age restrictions to certain sessions. Also, we recognise that the older children have differing needs. Separate, additional provision for groups of secondary age children may be helpful, e.g. to develop independence skills or prevent younger children being exposed to inappropriate but not dangerous behaviour. Such specific provision may be offered only to children selected as suitable by the Playleaders. This will be done in accordance with each group's eligibility criteria which will be agreed with the Trustees. This type of group will only be used if it will increase the range of children able to access CHIPS overall and/or enable children to move towards alternative mainstream provision.

Siblings will be encouraged to participate fully in their own right and CHIPS staff/volunteers will ensure that they are released from the responsibility of caring.

INTIMATE CARE POLICY

While caring for children at the playschemes a number of routines involve intimate handling. These would include:

- Helping with dressing or undressing,
- Assisting with toileting and changing,
- Assisting with medical care e.g. checking tubes and administering rectal drugs,
- Moving and helping less mobile children on equipment,
- Providing comfort and support for a distressed child.

Each child will be treated with dignity, respect, sensitivity and privacy appropriate to their age, culture, gender and needs. Wherever possible children will be responsible for their own intimate care. CHIPS will try to promote independence as much as possible in regards to intimate care, whenever appropriate.

Care will only take place in private when necessary and never in secret. For some procedures (e.g. changing and administering rectal medication) two members of staff or member of staff and an experienced adult volunteer will always be present. If only one staff member is needed, other staff will be aware of the situation and on hand.

Common and consistent practices will be agreed within the group and with the parents in writing for children with complex needs. Written procedures will be available for changing and medical care. These will be reviewed annually by the Playleader with the parents.

We will ensure all regular staff and volunteers have access to relevant training and support. We will keep a register of staff and volunteers who have been trained in particular procedures.

Any concerns of staff, volunteers, children or parents regarding intimate care will be dealt with in accordance with the complaints policy.

HEALTH POLICY

Children will be offered the opportunity to play in the fresh air whenever practical both in the outside areas within the premises and in outings to parks etc.

Parents are asked to keep their children at home if they have any infection and to alert the group to any infections, which might have been passed on already. Some of the children using the schemes are very vulnerable to infection and it is important to know if they have had contact.

If the Playleader feels a child is not well enough they will be taken home by the parent.

Children should not be brought to the schemes if they have had vomiting or diarrhoea in the last 48 hours unless this is part of an underlying medical condition.

If the children of staff or adult volunteers are unwell they will not accompany them to the schemes.

Cuts or open sores will be appropriately covered.

Ofsted will be notified of any food poisoning affecting two or more children.

Trained first aiders will be available. Staff will be offered and encouraged to maintain a recognised first aid qualification.

First aid equipment will be kept clean, replenished and replaced as necessary. Sterile items will be kept in their packs until required

CHIPS will seek to meet all children's health needs where possible. Where additional training for staff to meet these needs, such as gastrostomy feeding, we will liaise with parents and seek this from an appropriate member of the health team involved with the child.

Administering of Prescribed and Non Prescribed Medication

Every child should be identified by two members of staff including a Playleader or allocated Deputy before medication is given.

If identical twins require medication during schemes a risk assessment must be completed with parent/carer to document any identifying marks e.g. hair colour, skin blemishes, or physical differences however small. If there are no identifying marks it is the parent/carer's responsibility to identify differences e.g. clothing, hairstyles, badges etc and this must be documented at the beginning of each session if necessary.

If possible all medication will be given by parents before or after the scheme or if appropriate by the children themselves. All medication will be clearly labelled with child's name, dosage, expiry date and any instructions. Non prescription medication must be in the original container.

For all medication, written information will be obtained from the parent giving clear instructions as to the dosage, timing, including time of last dosage given and method of administering the medication and written and signed permission for a suitably qualified member of staff to follow these instructions. The dosage must be consistent with that described on the pharmacy packaging.

All medications will be stored by staff in a locked container out of reach of children. Medicine will be signed in at the beginning of the session by the Playleader, and out again at the end of the session. Any medication taken on outings will be carried by staff. Staff and volunteers must ensure that their own medication is stored securely.

A medication record will be kept to note the name of the child receiving medication, times and method by which the medication should be given, date and time when it is administered and the signature of the adult who has administered each dose. A record will be made if a child refuses medication and parents informed.

We will ensure that staff are adequately trained and insured for administering all necessary medication. Parents to be informed when collecting their child of any medication that has been administered.

Where parents and Playleaders agree a child or young volunteer may carry their own (as needed) asthma inhaler. This can be administered at their own discretion.

Non prescription medication

May be administered at parents request for acute minor symptoms i.e. headache, hay fever. Parents to give permission at the beginning of the session or are to be contacted before medication is administered to obtain their permission. This call is to be recorded on a non-prescription medication form.

Emergency Medication

On arrival at the playscheme, the Playleader to check with parents when the last dosage was given.

Alternative Medicines

Administration of alternative medication i.e. homeopathic medication may be negotiated on a case by case basis with the Playleader. Parents to be informed on collecting their child of any non-prescription medication administered.

Sunscreen

Parents are requested to apply sunscreen to their children prior to bringing them to CHIPS. CHIPS will apply spray-on sunscreen if they think it is needed, unless requested not to by parents.

HYGIENE POLICY

No smoking is allowed at any CHIPS playscheme.

Hands will be washed under running water with pump soaps after using toilet or changing and before preparing food or drinks. In the case of allergy, suitable alternatives will have to be agreed.

Boxes of tissues will be available and children encouraged to blow and wipe their noses when necessary. Soiled tissues will be disposed of hygienically. Children are encouraged to shield their mouth when coughing.

Children with pierced ears should be encouraged to wear small studs and not to try on or share each other's earrings. If earrings come out they will not be replaced by staff or volunteers.

Clean towels or paper towels will be available and disposed of properly.

Any spills of blood, vomit, urine or excrement will be wiped up promptly using rubber gloves and flushed down the toilet. Floors and other affected surfaces will be disinfected.

Procedures for changing will be displayed in writing and adhered to strictly. Suitable clothing and gloves will be worn and all surfaces disinfected after use.

Spare laundered pants and other clothing should be provided by parents and available in case of accidents. Polythene bags will be available in which to wrap soiled clothing.

All surfaces will be cleaned with an appropriate cleaner before use

Food other than snacks is not usually offered. If, however, a cookery activity or special event with food is offered, the following rules will be observed.

- Hands will be washed under running water before handling food.
- No person suffering from a contagious illness or skin trouble will be involved in food preparation.

- Never cough or sneeze over food.
- Use different cloths for kitchen and toilet areas.
- Prepare raw and cooked food separately.
- Keep food covered and either refrigerated or piping hot.
- Wash fresh fruits and vegetables thoroughly before use.
- Food or drink requiring heating will be heated just before serving and not kept hot. No food or drink will be reheated.
- Washing up will be allowed to air dry or disposable paper towels will be used.
- All utensils will be kept clean and cracked or chipped china will not be used
- Food preparation areas are registered with the district environmental health department. Food hygiene training will be offered to staff and each scheme will ensure that they have qualified staff.

DIETARY POLICY

The sharing of refreshments plays an important part in the routine of the groups. Staff and volunteers are to be good role models, where possible sit with the children, and encourage social interaction. Children are encouraged to try new /different foods and to be independent, making choices and helping themselves. The group will ensure that children's medical and personal dietary requirements are respected.

Where necessary a child will be fed in an appropriate way by staff or volunteers, according to the parent's instructions.

The dietary rules of religious groups as well as of vegetarians and vegans will be met in appropriate ways.

Children's individual allergies are recorded and shared with all staff and volunteers.

Parents are asked to provide a packed lunch for their child during holiday playschemes. Parents are encouraged to include, healthy food items and drinks, but we understand that some children have a limited diet. Parents are asked to enclose a cold/freezer block. Where possible lunch boxes will be kept in a cool area.

CHIPS will provide healthy snacks and drinks. Water will be available at all times.

No nuts to be included in packed lunches or offered as a snack.

SAFETY POLICY

The safety of the children is paramount. All children are supervised at all times and will normally be within sight of an adult.

A high staff/volunteer: child ratio is essential to provide good quality care. The appropriate degree of supervision for each child will be allocated by the Playleader in discussion with the parents. Children at risk of a medical emergency will normally be allocated adult staff supervision.

All accidents and incidents involving anyone at the scheme will be recorded on the appropriate recording form. These records will be monitored by the Playleader. Significant hazards or extra safety precautions required will be reported as appropriate to the Chair of the Board of Trustees.

All staff and volunteers will be aware of the system in operation for children's arrivals and departures. A member of staff will be at the door during these periods.

Children who require to be lifted should have their own individual written care plans, which staff should follow. Regular safety checks including fire safety are made on premises both indoors and outdoors.

Premises are risk assessed before each session including a fire risk assessment. Equipment is checked regularly and any dangerous item repaired or discarded.

The layout and numbers attending will allow all participants including those in wheelchairs to move freely between activities.

Fire doors are never obstructed except where a simple, rapidly removable barrier familiar to all staff and volunteers is needed for security.

Fires/heaters/electric points/ wires are adequately guarded.

All dangerous materials, including medicines and cleaning materials, are stored out of reach of children.

Children will not have unsupervised access to kitchen areas or hazardous materials including matches.

Staff and volunteers are to be aware of the danger of hot drinks.

Fire drills are held at every playscheme at least termly, in a way, which is sensitive to children's fears. These will be recorded and the records kept for

inspection.

A register of both adults and children is completed as people arrive and leave so a complete record of those present is available in an emergency.

Whenever children are on the premises, at least two adults are present.

Groups of children will leave the premises only with at least two competent adults.

Children who are sleeping must be supervised.

Internal safety gates/barriers are to be used as necessary.

The premises are checked before locking up at the end of the session.

E-SAFETY POLICY

E-Safety and Internet Use

Children attending CHIPS playschemes do not have access to the internet during sessions.

Computer Club

At CHIPS we understand the responsibility to educate the children who attend our Computer Club on e-Safety Issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, at the club and at home.

The club has a set of e-safety rules which are given to each child and are on display during sessions. The staff and parents periodically receive a copy of the Herts for Learning e-safety newsletter.

Photographs and Videos

Photographs or video footage of the children should only be taken by CHIPS staff or volunteers on CHIPS equipment for purposes authorised by the Playleader. Any such use should always be transparent and only occur where parental consent has been given. Any photos taken at the schemes by non staff personnel (local press etc) for CHIPS publicity will be in accordance with parental and staff consent given on their registration forms. In the specific case of photographs being taken at scheme, in line with parental consent, the photos will be transferred to the office as soon as possible via memory stick, online storage or memory card, and removed from the camera. Where a laptop is used to transfer the photos to the office, the laptop shall be password protected and the photos removed as soon as transfer is

confirmed.

Mobile Phones

Personal mobile phones must be left with belongings in a designated area and not be carried with staff and volunteers during sessions. In certain situations i.e. during an outing, the Playleader may ask staff or volunteers to have their phone available for use. Children are not to bring mobile phones to the playschemes unless required to and from the scheme, and if this is the case the phone will be handed to the Playleader at the beginning of the session and will be handed back at the end of the session. CHIPS accepts no liability for the phone or device if handed to the Playleader for this reason.

Staff, Volunteer and Trustee Social Media Policy

CHIPS Staff and Volunteers must not:

- Use social media when working or volunteering at the CHIPS Schemes for any personal purpose.
- Create or transmit material that might be defamatory or incur liability for CHIPS.
- Post message, status updates or links to material or content that is inappropriate. Inappropriate content includes: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs. This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.
- Use social media for any illegal or criminal activities.
- Send offensive or harassing material to others via social media.
- Broadcast unsolicited views on social, political, religious or other non-business related matters.
- Send or post messages or material that could damage CHIPS's image or reputation.
- Interact with CHIPS's competitors in any ways which could be interpreted as being offensive, disrespectful or rude. (Communication with direct competitors should be kept to a minimum.)
- Discuss colleagues, competitors, families or suppliers without their approval.

OUTINGS & EVENTS PROCEDURE

It is our aim to give the children in the care of CHIPS as wide a range of experiences as possible. One way in which we can fulfil this is to take the

children on outings within the local community or organise special visits to the scheme by outside organisations.

All outings and events will be risk assessed in advance.

Groups of children will leave the premises only with at least two competent adults. On outings, the staff/volunteer: child ratio will be appropriate to the needs and ages of the group of children, but normally a minimum of 1:2.

If a small group goes out, there will be sufficient adults to maintain appropriate ratios for young volunteers and children remaining on the premises.

A permission slip for local outings is included in our registration form which all parents will have completed. No prior notice has to be given for such activities. When going on prearranged or longer outings, parents will be fully informed of the arrangements and appropriate notice given.

When going on an outing the following procedure is adhered to: -

Where possible, every child is given the opportunity to attend.

A list is compiled of the children and helpers going on the outing. This is duplicated so one list goes with the group and Playleader. The other will remain at the signing in desk or CHIPS office.

The group will carry a walkie-talkie or mobile phone. The Playleader is responsible for ensuring that the group takes any medication required, first aid kit and contact details required.

On return to the transport and/or the setting, all children and links are checked back in, via the outing list.

In the event of a serious incident occurring while on a trip, involving the need to seek medical or police support, appropriate staff with a mobile phone will be allocated to remain with the child (ren) involved. Parents will be informed immediately. The rest of the group will return to the scheme. The Playleader will liaise with those left behind, to arrange return transport, as required. The incident will also be reported to Hertfordshire County Council Childrens Services via the current 'Events and Notifications Procedure form'.

IN THE EVENT OF A LOST CHILD

It is the responsibility of the Playleader to maintain a check on all the children on the outing. Where possible each child will have a personal link. In the event of a child becoming detached from the group the following procedure will take place.

A search of the immediate area will be carried out. If the child is not located, the on site Playleader to be contacted via walkie-talkie or mobile phone.

One staff member will remain at the site of the outing while the rest of the group returns to site.

On return of the group the Playleader to join the staff member to continue the search.

Police and parents will be contacted at the earliest appropriate stage.

The incident will also be reported to Hertfordshire County Council Childrens Services via their 'Events and Notifications Procedure form'.

COLLECTION OF CHILDREN

On arrival at the scheme the parent signs the child in. It is expected that on collection of the children that the parent will sign the child out.

A staff member is always based at the signing in desk at home time to monitor the safe collection of children.

CHIPS requests that parents inform the Playleader if another person is collecting their child.

It is the Playleader's responsibility to make sure that all the children are signed out and that they have gone home with the correct person.

IN THE EVENT OF A LATE COLLECTION

It is expected that all the children will be collected on time; however, it is inevitable that sometimes, unforeseen circumstances happen e.g. car breakdown. If such an occasion arises CHIPS expects to be informed by phone of the reason for late collection.

Staff are on site after the end of the playscheme. If a child is still in our care after half an hour the emergency mobile/contact number will be called and collection requested. If we have been unable to make contact, Social Services will be informed.

Two staff members will remain with the child on paid overtime until the situation is resolved. CHIPS reserve the right to charge a fee if this is a regular event (i.e.3 times or more).

CONTINUITY PLAN

Playscheme and club sessions

CHIPS will endeavor not to cancel any sessions.

In the event of bad weather:

If a Playleader is aware of circumstances such as snow, which may affect the safety of those travelling to or attending CHIPS, they will, in consultation with the Charity Manager and Chair or, in their absence, the Vice Chair of Trustees:-

Obtain the following information:

1. Check the BBC local weather and traffic reports on www.bbc.co.uk
2. Try to contact the school or another contact in the vicinity for information on local conditions.
3. If safe and time allows, the Playleader may choose to visit the site for an assessment.

Assess the following risks:

- Risks to families, staff and volunteers of travelling. (May be possible for those living locally but not others).
- Risks to children, staff and Volunteers on site. (May be possible to adapt the session).

If forecast suggests conditions likely to deteriorate, the risk of children and helpers becoming stranded at the scheme is critical and will normally result in cancellation.

If risks to some or all the children or staff and volunteers outweigh the benefits of running, the scheme will need to be reduced in size or cancelled. The decision to cancel or reduce service will be taken in consultation with a senior Trustee and only when it is clear conditions are unlikely to significantly improve.

In the event of widespread contagious illness /virus:

If CHIPS becomes aware of a serious, contagious illness which is likely to affect the health of the children, staff and volunteers who attend schemes, the Charity Manager, in consultation with the Chair or Vice Chair of Trustees will:

Obtain information from and follow official guidelines from Hertfordshire County Council, Public Health England, the Department for Education and the Department for Health.

Contact the Headteachers of school hired for sessions to discuss additional health and safety procedures which have been put in place.

Assess the risks to the health of families, staff and volunteers attending sessions.

If risks to some or all the children or staff and volunteers outweigh the benefits of running, the scheme will be cancelled. The decision will be taken in consultation with the Chair or, in their absence, the Vice Chair of Trustees.

In the event of reduced facilities at the school or venue becoming unavailable for a session:

If the charity is informed that there is a problem with the facilities at the school i.e lack of hot water, toilet facilities or utilities, the Charity Manger will:

Contact the Playleader and Chair, or in their absence the Vice Chair of Trustees to discuss the situation.

Assess the risks to the health of families, staff and volunteers attending sessions.

Consider the relocation to alternative premises such as those used by another CHIPS scheme.

If risks to some or all the children, staff and volunteers outweigh the benefits of running, the scheme or alternative suitable premises cannot be found, the session will be cancelled. The decision will be taken in consultation with the Chair or, in their absence , the Vice Chair of Trustees.

In the event of staff /leader shortages:

If the Charity Manager becomes aware of severe staff shortage or that no leader is available for a forthcoming session. They will:

Look to cover staff/leader from the CHIPS staff bank or transfer from other schemes.

Contact the Playleader and Chair, or in their absence the Vice Chair to discuss the situation.

If replacement staff /leader cannot be found, the session will be cancelled. The decision will be taken in consultation with the Chair or, in their absence, the Vice Chair of Trustees.

Procedure for cancelling scheme:

The Playleader will immediately:

Contact all staff, volunteers and parents/carers. They may delegate some calls to the Charity Manager, other staff and parents to speed up the cascading of the information.

Playleaders are expected to retain all emergency contact details at home for this purpose. It should not be assumed that there will be access to records at the CHIPS office or schools.

The Office manager (or the Trustee in their absence) will immediately:

- Arrange posting of announcements on the CHIPS website and local radio stations (Three Counties and Heartbeat).
- Notify the school, if necessary.

The Manager will, in due course, notify Trustees and funders of the cancellation and the reasons for it.

Restoration of Service

When the illness window / weather / utility situation is resolved, after discussion with the Chair or, in their absence, the Vice Chair of Trustees, the Charity Manager will contact the leaders to discuss the plans to restore operations. Trustees and funders will be kept informed.

Central Administration

In the event of bad weather:

The administration team will continue to travel to and work from the CHIPS main office unless it is considered to dangerous for them to travel .This decision will be made by the Manager after checking the BBC local weather and traffic reports.

In the event of widespread contagious illness /virus:

If CHIPS becomes aware of a serious, contagious illness which is likely to affect the health of the staff the Charity Manager, in consultation with the Chair or Vice Chair of Trustees will obtain information from and follow official guidelines from Hertfordshire County Council, Public Health England, the Department for Education and the Department for Health.

In the event of reduced facilities at the office premises:

The Charity Manager will make the decision to continue working at the premises or to close the office, until the situation is rectified.

The Trustees will, as funding permits provide all staff with the necessary I.T. equipment to facilitate working from home, should the need arise.

STAFF DISCIPLINARY PROCEDURES

CHIPS maintain a well motivated, highly skilled and professional staff team. However, occasionally action will need to be taken to encourage improvement in individual behaviour and performance. Our aim is to support and encourage staff, while promoting good employment relations. Staff and volunteers are to adhere to the Staff/Volunteer Code of Conduct and Dress Code provided as part of their joining pack at all times, and failure to do so may result in disciplinary action.

If a member of staff is subject to disciplinary action, fair and consistent procedures will be employed:

- The incident will be fully investigated and the facts established.
- Investigations will be non-discriminatory and apply equally to all staff irrespective of sex, marital status, sexual preference, race or disability.
- At every stage, the member of staff concerned will be advised of the nature of the complaint and given an explanation for any penalty imposed.
- Staff will be given the opportunity to state their case, and be accompanied by a friend, colleague or Trade Union representative of their choice, during any part of the disciplinary process.
- Staff will not be dismissed for a first breach of discipline except in the case of gross misconduct (see below).
- Staff have a right to appeal against any disciplinary action taken against them.
- Investigations will be conducted by the Playleader for Play staff, Chair for Playleader and Co-ordinator.

The procedure operates as follows:

Informal Discussion

Before taking formal action, the Playleader/Chair will make every effort to resolve the matter by informal discussion with parties concerned. Only where this fails to bring about satisfactory improvements or outcomes will disciplinary procedures be formally implemented.

Stage One

Formal Verbal Warning

Once a formal warning has been given by the Playleader/Chair, the member of staff in question will be notified of this and given an explanation for the warning. They will further be informed of their right of appeal. A brief note of the warning will be kept on CHIPS records. This will be disregarded after six months, subject to satisfactory conduct and /or performance.

Stage Two

Formal Written Warning

If, following a formal verbal warning, there is insufficient improvement in standards, or if a further incident occurs, a written warning, giving notice of a period of time (minimum one month) over which progress will be monitored

will be issued. This will state the reason for the warning and that, if there is no satisfactory resolution after the stated period of time, a final written warning will be given. A copy of this first written warning will be kept in CHIPS records, but will be disregarded after 12 months, subject to satisfactory conduct and /or performance.

Stage Three

Final Written Warning

If the member of staff's conduct or performance remains consistently unsatisfactory, or if the misconduct is sufficiently serious, a final written warning will be given making it clear that any further breach of the standards or other serious misconduct may result in the employee's dismissal. A copy of the warning will be kept in the CHIPS records, but will be disregarded after 24 months, subject to satisfactory conduct and /or performance. The warning will state clearly that dismissal will result from a failure to comply.

In certain exceptional circumstances, a member of staff may receive a Final Written Warning that will remain on CHIPS records indefinitely. This course of action will follow when a member of staff has only avoided dismissal due to extenuating or mitigating circumstances.

Stage Four

Gross Misconduct

If, after investigation, it is deemed that a member of staff has committed an act of the following nature, dismissal will be the normal outcome:

- Child abuse (for further detail refer to the Child Protection Policy), or repeatedly behaving in an inappropriate way, which could give opportunity to abuse.
- Serious breach of confidentiality. (Less serious breaches may be dealt with by warnings)
- Serious infringement of health and safety rules (see Health and Safety Policy).
- Assaulting another person
- Persistent bullying, sexual or racial harassment or insensitivity to disability.
- Being unfit for work through alcohol or illegal drug use.
- Grossly inappropriate behaviour in front of children.
- Gross negligence that either causes or might cause injury, loss or damage to persons or property.
- Theft, fraud or deliberate falsification of CHIPS documents.
- Deliberate damage to CHIPS property.
- Being an unfit person under the terms of the Care Standards Act 2000 or the Children Act 1989.

While the alleged incident of gross misconduct is being investigated, the individual concerned is likely to be suspended, during which time normal pay levels will prevail. Such suspension is not to be regarded as a form of disciplinary action and will be for as short a period as possible. Any decision to dismiss will be taken only after a full investigation.

If the staff member has been found to have committed an act of gross misconduct, they will be dismissed without notice.

Allegations against Staff

All staff are advised to minimise time spent alone with children and young volunteers and be aware of the potential risk in doing so (for further details refer to Child Protection policy).

If an allegation of abuse has been made against a member of staff, the Playleader/Chair will follow the procedures of the Child Protection policy.

If an allegation of abuse is made against the Playleader, then another member of staff will report the matter directly to the Chair of Trustees, who will take the appropriate action.

Appeals

Staff wishing to appeal against a disciplinary decision, must do so in writing and within 15 working days of the decision being communicated. Appeals will be dealt with as quickly as possible and within at least a further 15 days. Someone who was not involved in the original disciplinary action will hear the appeal and impartially adjudicate the case. Appeals will be heard either by an agreed independent Trustee rather than the Chair of Trustees, or by another agreed third party such as Ofsted.

At all stages of the procedure, the right to appeal will be confirmed as part of the warning, suspension or dismissal letter.

STAFF GRIEVANCE POLICY

CHIPS recognises that from time to time employees may wish to seek redress for grievances relating to their employment.

CHIPS tries to encourage free communication between employees and their managers to ensure that questions and problems arising during the course of employment can be aired and where possible, resolved quickly and to the satisfaction of all concerned. However, if a grievance cannot be resolved in this way, the CHIPS Grievance Procedure should be followed.

Stage 1

Where an employee has a grievance arising from employment that has not been resolved after initial verbal discussion with their manager i.e. Playleader for play staff, Chair of Trustees for Playleader and Co-ordinator, the employee should raise the matter in writing with their manager. Within 10 working days the line manager should invite the employee to attend a formal hearing to discuss the grievance. The employee has the right to be accompanied by an appropriate representative.

After due consideration, the manager will give a decision in writing, if possible within 5 working days. If it is not possible to respond within this time limit the employee should be given an explanation for the delay and be advised when a decision can be expected.

Should the employee's grievance concern their manager the grievance should be raised with a Trustee not involved. Should the employee feel their grievance to be of a too personal nature to discuss with their manager the grievance may be raised with another Playleader or Trustee.

Stage 2

If the matter is not resolved, the employee may raise the matter in writing, with a senior manager i.e. Chair of Trustees for play staff and Personnel Committee of the Board of Trustees for Playleader and Co-ordinator. The senior manager will obtain the managers record of grievance and arrange to meet the employee. This meeting should be within 10 working days of the matter coming to their attention. The employee has a right to be accompanied at the meeting. The meeting can be delayed by up to 5 working days if their chosen representative cannot attend or other circumstances prevail e.g. illness. At this meeting any additional information will be recorded and a decision given in writing within 10 working days of the referral. If it is not possible to respond within this time limit the employee should be given an explanation for the delay and advised when a decision can be expected. This decision will be final.

Stage 3

If the matter is still not resolved and the employee still remains dissatisfied, they may raise the grievance with a mutually agreed, external third party. If required a further meeting may be arranged and the employee may be accompanied by an appropriate representative. A decision will be given, if possible within 10 days. This decision will be final.

Special Consideration

In certain circumstances, with mutual agreement, it may be helpful or necessary to seek external advice and assistance. CHIPS policies and procedures should be consulted where necessary.

Records

Records should be kept detailing the nature of the grievance raised, the employee's response, any action taken and reason for it. These records will be kept confidential and retained in accordance with the Data Protection Act 1998, which requires the release of certain data to individuals on their request. The records will be held on the employees file. Copies of any meeting records should be given to the individual concerned although in certain circumstances some information may be withheld, for example to protect a witness.

WHISTLE-BLOWING POLICY

The term 'whistle-blowing' is used to describe incidents where an employee publicly discloses alleged wrongdoing within an organisation. The Public Interest Disclosure Act 1998 aims to promote greater openness in the workplace and protects 'whistle-blowers' from detrimental treatment, i.e. victimisation or dismissal, for raising concerns about matters in the public interest.

Everyone involved in CHIPS has a duty to report any illegal, unsafe or unethical practices. CHIPS actively and continuously encourages volunteers, staff and families to raise concerns and suggestions for improvement in order to maintain high quality provision. Everyone can raise matters with Playleaders, the Co-ordinator, the nominated Trustee or any other Trustee. Contact details for Ofsted and the Designated Person for Child Protection are displayed at all schemes. Employees are normally expected to raise concerns promptly and confidentially, through these channels first and only move to external disclosure if this does not resolve matters. Serious disclosures should include accurate, formal recording of adverse events.

The purpose of this policy is to provide a means by which people working for CHIPS are

enabled to raise concerns with the appropriate authority e.g. the Chair of CHIPS Trustees, Ofsted or HCC's Nominated Contract Manager, if they have reasonable grounds for believing there is a serious problem which needs addressing.

Examples of concerns which might need to be addressed by whistle blowing would include:

Danger to the children, other staff or public.

Fraud or misuse of funds

Discriminatory or disrespectful treatment of the children or others

The Whistle Blowing policy will not apply to personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters.

Concerns must be raised without malice and in good faith, and the individual must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true. The disclosure must not be made for purposes of personal gain.

Protection for Whistle Blowers

CHIPS will ensure that any member of staff who makes a disclosure in such circumstances, will not be penalised or suffer any adverse treatment for doing so. Anyone who treats a genuine whistleblower adversely may be subject to disciplinary procedures. However, anyone making unreasonable or malicious allegations cannot expect this protection.

In view of the protection afforded to a member of staff raising a genuine concern, it is preferable if that individual puts his/her name to any disclosure. The identity of the person raising the matter will be kept confidential, if so requested, for as long as possible, provided that this is compatible with a proper investigation.

Whistle- blowing Process

The person to whom the disclosure is made will normally consider the information and decide whether there is any substance to the disclosure. He or she will decide whether an investigation should be conducted and what form it should take. Some matters following investigation, will need to be referred to the relevant outside body, e.g. the Local Authority Designated Officer, Ofsted or the Police or handled under other procedures. All Child Protection allegations against staff or volunteers will be referred, without exception, to the Local Authority in line with our Child Protection Policy. The person conducting any internal CHIPS investigation will record each stage of the process.

Investigation

Where a disclosure is made the person or persons against whom it is made will be told at an early stage of it and of the evidence supporting it where it is deemed that this will not hamper the investigation. They will be allowed to respond. The individual making the disclosure will be informed of what action is to be taken. The person making the disclosure and Trustees will be informed of the outcome.

Anonymous Complaints

Anonymous complaints are not covered by this procedure, but may be reported, investigated or acted upon as the person receiving the complaint sees fit.

External Disclosure

If, having exhausted this CHIPS procedure, a member of staff is not satisfied with CHIPS' response and reasonably believes that the information disclosed, and any allegation

contained in it, are serious and substantially true, he or she has a duty to take the matter further by raising it with Ofsted, Hertfordshire County Council's nominated contract manager, their local councillor or MP.

RECRUITMENT PROTOCOL

This applies to all adults and to young volunteers as they approach 18 years.

1. Applicant contacts CHIPS office.
2. Paperwork sent to applicants: CHIPS information leaflet, Job description, Application form and Policies.
3. Application form received. Coordinator will conduct a telephone skills interview checking details of qualifications, experience etc.
4. References requested: 2 referees, not relatives, friends or neighbours.
5. Personal interview arranged subject to reference checks. Where possible interviewers include CHIPS Chairman/Trustee and Playleader otherwise it will be Chairman/Trustee and other senior member of staff. Reason: We occasionally find it difficult to arrange with Playleaders, or due to illness, Co-ordinator/Deputy stands in. ID and Right to Work in the UK Checks completed.
6. If appointed applicants must complete and sign: Confidentiality form and Payroll form.
7. DBS completed online.
8. When DBS clearance is received, applicant is appointed.
9. Letter sent to inform applicant of appointment.
10. Copy of application form sent to appropriate Playleader.
11. Applicant is entered into CHIPS records.
12. A statement of job description, pay and employee information will be sent out.

EQUALITY AND DIVERSITY POLICY

CHIPS is committed to the principle of equal opportunities for all children, staff, volunteers and everyone involved with CHIPS.

Children and Families

We will be sensitive to individual needs and abilities in order to support each child's development.

We aim to provide the opportunity for each child to develop self-awareness and self-discipline, mutual respect and sensitivity to others.

We value and will show respect for diverse racial, social and cultural practices and will endeavour to welcome and support families with English as

an additional language.

We value all languages, dialects and means of communication spoken or signed by the children.

We will not tolerate any language, graffiti or behaviour, which is offensive on the grounds of disability, gender or ethnic origin.

We will encourage respect for others and considerate behaviour through the use of role models and peer examples.

We will be alert to disability, racial and gender prejudice or harassment by children or adults and deal with it promptly and firmly as unacceptable behaviour.

CHIPS recognise that many different types of family, love and care for children.

The time, place and conduct of meetings will ensure that all families have an equal opportunity to be involved in the running of the group.

Employment of staff and volunteers

We are committed to an equal opportunities employment policy, seeking to offer work opportunities to a diverse group of women and men, with and without disabilities, from a range of religious, social, ethnic and cultural groups.

CHIPS will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

All recruitment will be conducted in accordance with CHIPS recruitment procedure. We are committed to recruiting, appointing and employing staff in accordance with all relevant legislation. We check address ID, photo ID and perform Right to Work in the UK checks.

CHIPS approach to training and development provides fair and equal access for all staff to training activities and development opportunities.

Staff with appropriate qualifications and experience will always be available to support new staff and volunteers.

Individuals can be held personally liable for any act of unlawful discrimination. Those who commit serious acts of harassment may be guilty of a criminal offence. Acts of discrimination, harassment, bullying or victimisation against employees or clients are disciplinary offences and will be dealt with under CHIPS' disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Employees should report any bullying or harassment by staff, volunteers, visitors, parents, children or others to their Playleader who will take appropriate action.

If you consider that you may have been unlawfully discriminated against, you may use CHIPS' grievance procedure to make a complaint. Use of CHIPS' grievance procedure does not affect your right to make a complaint to an employment tribunal.

Our recruitment strategy is based upon the organic growth of the Charity to ensure continuity of care for our children - this means that internal promotion is preferred and we aim for a steady growth of services.

Volunteers will be recruited widely and continuously through as many sources as possible, including website/community/schools/ Duke of Edinburgh Award. Anybody over the age of 12 can apply to be a volunteer. We will provide specific support to those who wish to volunteer and have additional needs.

Where paid positions are offered if the role cannot be filled internally we advertise in the local press, website and HCC recruitment channels.

We make it clear in our website and recruitment process that we value diversity and have policies that reflect this.

We have developed a recruitment process which assures the capability and commitment of the staff we recruit through standardised competency based interviews, reference and qualification checks, DBS checks and right to work checks. The competencies we seek to recruit are only those required to fulfill the role.

Instead of interviews, young volunteers visit the scheme and talk informally to the Playleader. An application form is completed and a school reference is always taken up before starting.

STUDENT PLACEMENT POLICY

Students are welcomed into the schemes if they are engaged in an appropriate course relating to the care, development or management of children. This must be confirmed by the student's tutor.

The needs of children are paramount and students will not be admitted in numbers, which hinder the work of the scheme.

Students conducting child studies will obtain written permission from the parents of the child to be studied.

All information gained by students about the children, families, other staff or volunteers in the group is confidential. (See confidentiality policy.)

Students will not have unsupervised access to children and it will be clear as to who is their supervisor.

PARENTAL CONTRIBUTIONS POLICY

Contributions must be received by the date specified on the allocation letter or the place cannot be guaranteed.

Fees must be paid in full, unless by prior agreement.

Refunds will only be given for places cancelled for Summer, Easter and Christmas schemes if notice is received a minimum of 14 days before the start of scheme.

No refund will be given for cancelled/non attended Saturday club sessions.

In the event that a session is cancelled payments received will be carried over.

COMPLAINTS PROCEDURE

We aim to offer a welcome to each child and family and provide a warm and caring group in which to play.

We believe children and parents are entitled to expect courtesy and prompt, careful attention to their needs and wishes. Parents should also treat staff or volunteers with courtesy. Our intention is to work in partnership with parents and we welcome suggestions as to how to improve our schemes at any time.

A parent, staff member or volunteer who is uneasy about any aspect of the playscheme should first of all talk over any concerns with the Playleader. Their views and concerns are respected and acknowledged. Appropriate and prompt action is taken on any concerns raised and a record of all complaints is maintained.

If this does not have a satisfactory outcome, or the problem recurs, then the concerns should be put in writing to the Chair of Trustees c/o the CHIPS office, and a request made for a meeting with the Playleader and the Chair of the Trustees. This meeting to be held within 14 days of receipt of the letter. Both parties may have a supporter with them if required, and an agreed written record of the discussion will be made. Findings or outcome of any investigation resulting from the meeting to be reported to parents within 14 days.

Most problems should be resolved in this way but if not, then the Chair should be contacted again.

If the matter cannot be resolved, then a mediator acceptable to both sides e.g. from Early Years Ofsted may be invited to assist. At this point the incident will be referred by CHIPS to Hertfordshire County Council Childrens Services via the current 'Events and Notifications Procedure form'.

The mediator will help define the problem, review the action so far and suggest further ways in which it might be resolved. All discussion will be kept confidential and will be appropriately recorded.

If a child appears to be at risk or there appears to be a breach of registration requirements the Early Years Ofsted Officer will be brought in to ensure appropriate steps are taken to ensure the children's safety.

We believe most complaints are made constructively and can be sorted out at an early stage. It is in everyone's best interests that complaints are taken seriously and dealt with fairly and in a way, which respects confidentiality.

Ofsted can be contacted at: -

Piccadilly Gate
Store st
Manchester
M1 2WD

Telephone Number– 0300 123 4234

Email – enquiries@ofsted.gov.uk

A list of all complaints, outcome and action taken, will be supplied to Ofsted on request.

Complaints records are accessible and available for inspection by Ofsted.

GENERAL PRIVACY POLICY

1. Who we are

CHIPS exists to provide play and social opportunities for children with additional needs, and their siblings, and to provide support for their families.

New regulations called the ‘General Data Protection Regulations’ or GDPR have been introduced as part of a new Data Protection Law. These new regulations give individuals more choice and more control over how their personal data is used. This policy sets out how CHIPS will comply with the GDPR.

Everyone connected to CHIPS, our families, young people, staff, volunteers and supporters, are all very important to us. We are committed to keeping your data safe, making it clear what information we will collect from you and how we will use it.

CHIPS is registered with the Information Commissioner's Office under number Z823741X and is a registered charity with the Charity Commission under number 1069535. Under the GDPR CHIPS is the ‘Data Controller’. The individual whose data we use is the ‘Data Subject’.

You can change how we contact you at any time, simply by contacting Supporter Care by email at info@chipsplay.org or by calling us on: 01992 534664.

As part of our commitment to you, we have appointed a Data Protection Officer. You can contact them either by writing to:

The Data Protection Officer,
CHIPS,
19-21 BULL PLAIN
HERTFORD
HERTS. SG14 1DX

or emailing: info@chipsplay.org

2. What data we collect and how we use it

The type and quantity of data we collect and use depends on why you have provided it.

We will only collect, use and otherwise handle your personal data:

- where you have consented to this for specified, explicit and legitimate purposes
- where this is necessary to fulfil legal obligations that apply to us
- where it is necessary for our legitimate interests relating to running our daily operations, as long as, in each case, these interests are in line with applicable law and your legal rights and freedoms.

3. CHIPS Families

CHIPS offer a wide range of services to children with additional needs, families of children with additional needs, and their siblings. We will collect your contact details and preferences, and any other data that is relevant to delivering the service to you and your family. This may include personal details, family details, GP contact details, a child's medical details, a child's care plan, a child's behaviour plan, a child's school details, ethnicity, cultural requirements, medical and social services team details, as well as details of the services you access at CHIPS.

This information will only be used for the purposes of the service and not shared with the rest of CHIPS unless you give us permission to do so.

We will share information with Hertfordshire County Council in line with our and their data protection policies, with regards to Short Breaks Local Offer (SBLO). We will also share any information required with regard to, and in line with any Child Protection matters, as required by law.

We will keep the data for up to six years, in line with contracts and government regulations.

4. Children's data

For our services, the service is always provided to the family or parent. Data is supplied to us where we have a legal basis to collect and retain that data as per the contracts, or included in the case notes provided, for example by paediatricians or family where there is a young person involved. This information is not shared with anyone not connected to providing the service at CHIPS.

Although children under 16 can volunteer or fundraise with the consent and support of a guardian, we **do not** record their contact information. Instead, their parent or guardian's details are recorded (with their contact

preferences). Individuals over 16 can be recorded but still require a guardian as reference (for school contacts this can be a teacher).

5. Supporters

If you support us, for example by signing up to an event, donating, signing up to Gift Aid, or signing up to a campaign, we will usually collect your name, contact details, and whether you would like to be contacted, and how we would do so. If appropriate, we may also ask to collect your date of birth, financial details, Gift Aid eligibility, reasons for support, and responses to our campaigns.

We collect this data so that we can:

- keep you up to date with the information which you have requested, or may be interested in,
- ask for more support, in the way that you have chosen;
- run our events; and
- fulfil our legal responsibilities for financial and Gift Aid reporting.

We will keep your data only for as long as necessary. If you have kindly donated to us, we are required to keep this data for seven years. If you have not donated to us, we will only keep your data for three years.

6. Staff

If you work for us, or enquire about our staff vacancies, we will usually collect your name, contact details, emergency contact details, bank details, national insurance information, tax information, contact preferences, gender, availability to work, previous employment details, qualifications, relevant experience details, relevant medical and disability information, Disclosure and Barring Service information and criminal convictions.

We collect this data so that we can:

- contact you about working opportunities that come up,
- so that we ensure the safety of our volunteers, staff and families,
- can pay you;
- can pay expenses;
- carry out our annual appraisals.

We will keep this data for five years after you stop working for us.

7. Young Volunteers (Under 17)

If you or your child volunteers with us, or enquire about our volunteering opportunities, we will usually collect your name, contact details, emergency contact details, guardian details, school/college details, bank details, contact preferences, qualifications, relevant experience details, gender, availability to volunteer, referee details, disability and criminal convictions.

We collect this data so that we can:

- contact you about volunteering opportunities that come up,
- so that we ensure the safety of our volunteers, staff and customers,
- can pay expenses;
- carry out our awards programme; and
- help us anonymously measure our inclusion and accessibility procedures across our volunteering programmes.

We will keep this data for five years after you stop volunteering for us.

8. Adult Volunteers

If you volunteer with us, or enquire about our volunteering opportunities, we will usually collect your name, contact details, emergency contact details, bank details, contact preferences, qualifications, relevant experience details, gender, availability to volunteer, referee details, disability and criminal convictions.

We collect this data so that we can:

- contact you about volunteering opportunities that come up,
- so that we ensure the safety of our volunteers, staff and customers,
- can pay expenses;
- carry out our awards programme; and
- help us anonymously measure our inclusion and accessibility procedures across our volunteering programmes.

We will keep this data for five years after you stop volunteering for us.

9. Photography

Our families, supporters, staff and volunteers kindly let us use photography and images of them to help our campaigns and activity come to life.

We keep these images stored in a secure location and will only use them with the subject's permission.

We keep these images for three years after we have been given them, unless you ask otherwise.

10. Complaints

Should you wish to register a complaint we will collect your name, contact details and details about the complaint to enable us to respond, monitor and improve our organisation.

This data will be shared with any parts of CHIPS or any third parties who are involved in resolving the complaint, for example, agencies that we have partnered with.

We will hold this data for six years.

11. Website

When someone visits chipsplay.org we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out information, such as the number of visitors to the various parts of the site.

If we want to collect personally identifiable information through our website, we will be clear about this, and what we require it for – eg signing up to our newsletter. We will make it clear when we collect personal information and will explain what we intend to do with it. We will collect any questions, queries and feedback you leave. This will include your email address if you send us an email, your IP address, and which web browser (and version) you use. Information on how people use the site, through cookies and page tagging, helps us to improve our website and our services. Find out more about our website [Privacy Policy](#).

We might also obtain your personal data through your use of social media such as Facebook, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

12. E-newsletter

We use a third-party provider, Mailchimp, to deliver our monthly e-newsletters. We collect statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see [Mailchimp's privacy notice](#).

13. Suppression (no contact) List

Should you not wish CHIPS to contact you in the future, we will hold your contact details on a Suppression (no contact) List. This will enable us to ensure that we comply to your wishes.

We will hold this data indefinitely. Should you wish to engage with CHIPS again then please get in touch with our office at info@chipsplay.org

14. Sharing your data

Unless we are required to share your data for legal or regulatory reasons, to help with a complaint, or to liaise with Hertfordshire County Council for Short Breaks Local Offer, we will never share your data with other organisations.

We do use third-party organisations to help us collect donations such as JustGiving and Virgin Money Giving, and to help us fulfil our marketing. Where we use external companies to collect or process data on our behalf, we carry out comprehensive checks on these companies, and put in place contracts to control how they manage the data they may collect or have access to.

15. Keeping your data safe and up to date

At CHIPS we ensure that the most appropriate technical controls are in place to keep your data safely. Access to your data is regularly reviewed and only accessible to the relevant trained staff, volunteers and contractors.

Where we use external companies to collect or process data on our behalf, we carry out comprehensive checks, and put in place contracts to control how they manage the data they may collect or have access to.

Your data will be hosted on servers located in the UK, which will not be transferred out of the European Union, or in the case of our e-newsletter and Mailchimp, the data will be stored in the US.

16. Data Protection Breaches

A data breach is anything leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to personal data. If this happens CHIPS will apologise for the data breach and will take immediate steps to ensure that it does not reoccur. Serious breaches will be reported to the Information Commissioner's Office.

17. Your rights

We will only collect the data that we need to carry out the purposes you have contacted us for, or given us permission to use it for.

To enable us to carry out the purposes you have contacted us for, there will be occasions when we will make some data collection mandatory i.e. your name and address to claim gift aid, or your email address to access our services. If you don't provide this data, we cannot carry out the purposes you have contacted us for.

We will always tell you why these fields are mandatory.
At any time that you wish you can:

1. gain access to your personal information,
2. object to the processing of your personal information,
3. object to the use of automated decision-making and profiling,
4. restrict the processing of your personal information,
5. ask for a copy of your personal data (known as data portability),
6. rectify or correct your personal information, and
7. have your personal information removed (known as Erasure or the 'right to be forgotten').

If you make a request to access your personal data held by CHIPS, we are required to inform Hertfordshire County Council as part of our contract with them to provide our services.

Where you have provided consent to be contacted or to receive a service, you will be entitled to withdraw that consent at any time.

If you are at any point unhappy with the way in which we have handled your personal data please contact us immediately and we will do all that we can to address your concerns. If you are still not happy, you can make a complaint to the Information Commissioner's Office via their Helpline on 0303 123 1113

To make changes to how we contact you, please contact our office at info@chipsplay.org

For all other requests please contact the Data Protection Officer at:

The Data Protection Officer,
CHIPS,
19-21 BULL PLAIN
HERTFORD
HERTS. SG14 1DX
or emailing: info@chipsplay.org

18. Changes to this Policy

We may make changes to this Privacy Policy from time to time. If we make any changes in the way we use your personal information we will make this clear on the [CHIPS Website](#) or by contacting you directly.

FUNDRAISING POLICY

Any CHIPS organised fundraising will be undertaken only by the charity and volunteers themselves. CHIPS approach to fundraising is a mixture of events, raffles and grant applications. All CHIPS events and raffle based fundraising will be overseen by CHIPS Trustees to ensure it is appropriate and protects the interests of the public and all involved throughout. There will be organisations and volunteers outside of CHIPS who will also raise money for us, and CHIPS monitors and holds these external fundraisers to the same standards as our own internal fundraising activities.

The CHIPS Co-ordinator and our Trustees monitor our fundraising and those volunteers fundraising for us at all times to ensure that it adheres to CHIPS core philosophies of care, protection and high standards. All CHIPS fundraising and those who voluntarily fundraise for us, is 'opt-in', and CHIPS nor those volunteers fundraising for us will not ever coerce or make unreasonable intrusions into a person's privacy or place undue pressure on our supporters to take part in any events or donate their time/money.

All CHIPS fundraising is monitored by the CHIPS Trustees and reported on at our termly Trustees meetings. The CHIPS office maintains records of any

fundraising activities either internally or externally at all times, and report any concerns or complaints immediately to the Chair of Trustees.

TREASURY MANAGEMENT POLICY

Purpose

The purpose of this policy is to set out the policies and processes that have been implemented to ensure the stability of the financial and organisational operations of the Charity, and that the Charity has flexibility to adapt to unforeseen changes in financial circumstances, such as large unbudgeted expenditure and outflows of working capital.

A Treasury Management policy is required in order to ensure that the management of cash activities, banking and investment transactions are performed with regard to the risk appetite of the Charity and in compliance with requirements set out by the Charity Commission.

The establishment of robust treasury management practices will protect the operations of the Charity and contribute to its smooth running, is good practice and is a component of the overall financial control and governance framework.

This document is to be used as a basis for setting out the Treasury operating principles that the Charity is recommended to adopt and is required to be approved by the Trustees.

Roles & Responsibilities

The Board of Trustees maintains overall responsibility for the security and management of the funds of the Charity. The day-to-day management of treasury activity is controlled by the Charity Manager, supported by the Treasurer. The Treasurer will liaise with the Board of Trustees in relation to any investment decisions, as well as make regular presentations to the Trustees in respect to the charity's financial position (e.g. budgets, cash flow forecasting, liaising with auditors).

Principles

This policy considers the following principles:

- The management of the Charity's cashflows, banking and deposit transactions
- The management of the risks associated with these activities

The key objective of this policy is to ensure that the Charity:

- At all times maintain sufficient cash balances in its current account to meet its day-to-day commitments and obligations, and that funds held with Banks are available on demand to generate payments.

- Ensuring there is adequate excess liquidity held in reserves to survive for a minimum of 6 months, to align with the Charity's stated objective with regard to the retention of reserves.
- It is noted that there is a degree of seasonality within the Charity's cashflow which will often result in higher levels of reserves at certain times (e.g. the months leading up to the summer period).

Risk Management

The key identified Treasury related risks facing the Charity are as follows:

Liquidity Risk – The overriding risk consideration is that security of the Charity's funds and liquidity is paramount and takes precedence over interest income maximisation.

Institutional Risk - The Charity should adopt procedures to ensure that its balances are spread amongst different Banks to ensure Institutional risk is mitigated.

Operational Risk – A robust internal control environment should be adopted towards the generation and release of payments, to ensure that only authorised payments are generated and reduce potential opportunity for fraud and error.

An annual assessment of the Risks faced by the Charity will be undertaken, to ensure that all Risks are captured and that the control and mitigation of those Risks is sufficient. The Treasurer will undertake the assessment and present to Trustees for challenge and review.

Budget & Cash Flow Forecasts

The Treasurer will prepare and present regular forward-looking cash flow analysis to Trustees to project the expected cash position, highlight any deviation from the budget and to provide early warning of lower than anticipated cash balances and reserves.

Borrowing

The Charity is not presently permitted to borrow funds or enter into loans.

Banking Relationships & Deposits

The Charity will operate operational current accounts with Banks approved by the Trustees (see Approved Banks section) and maintain sufficient balances to ensure there is adequate liquidity to cover all immediate and forthcoming financial commitments, including maintaining a sufficient liquidity contingency buffer for unexpected payments.

The Banking relationships operated by the Charity will be reviewed on an annual basis, with further review undertaken if there are specific concerns with any Bank that the Charity utilises.

Any new bank account or banking relationship must be approved by the Trustees, with consideration given to ensure that the Bank is regulated in the UK by the Prudential Regulation Authority (PRA) and therefore covered under Financial Services Compensation Scheme (FSCS).

The Charity will not maintain a total balance with any single Banking institution, that is in excess of the limit of protection offered under the FSCS which is currently £85,000.

The Charity permits placing excess funds on deposit monies surplus to the budgeted cash flow requirements to be invested in term deposits in financial institutions approved by the Trustees (see Approved Banks section).

When considering placing funds on deposit, the Treasurer or Charity Manager must request approval from the Trustees before entering into the transaction, and provide relevant supporting information to the Trustees to enable them to make an informed decision as follows:

- Approved banking Institution with which deposit will be placed
- Start and maturity dates
- Amount of deposit
- Rate of interest
- Impact on cash flow in relation to budget

Payments

A good payment control framework will allow the Charity to function effectively on a day-today basis, but with sufficient control to ensure that manual error or potential fraud are reduced.

CHIPS policy is that all payments are generated under a 'four eyes' policy. This means that all payments generated are input and released by different individuals.

The controls adopted by the Charity for the authorisation and release of payments are set out as follows:

Invoices - The Charity Manager will receive an invoice and reconcile against CHIPS internal records for correctness. A payment request will be input into the CAF online banking application for review and authorisation.

Staff and Ad-Hoc Payments - The Charity Manager will enter a payment request into the CAF online banking application for review and authorisation.

Large Payments - Any payment in excess of £250 will have supporting documentation scanned and shared to the Google Drive for review by the payment approver.

Once the payment has been input into the CAF banking application, the Charity Manager will send an email to a secondary approver to request authorisation and release. The secondary approver will login into the CAF application, review the payment and reconcile against the supporting documentation (if required) and authorise the payment.

Approved Banks

1. NatWest
2. CAF