



Yellow Submarine Master Policy Pack (Version 25.1)

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Business Continuity Policy v2.7

Yellow Submarine is committed to providing the best possible experience to our members and customers and to maintaining the best possible relationships with employees, shareholders and suppliers. To ensure the consistent delivery of our services, and in particular to keep disruption to members and families to a minimum Yellow Submarine has developed the following business continuity and disaster recovery (BC/DR) policy. It is about ensuring that a crisis is managed effectively before it escalates to a disaster. This policy includes our business continuity statement and the plan to be executed to manage any potential crises situations.

Business Continuity Statement

Yellow Submarine has identified that it faces minor risks from fire, flooding, computer/telecoms failure, and/or denial of office premises. Its operations do not depend on being in a particular office and so as a contingency plan to these risks the charity has alternative office spaces available, and has the option also of home working. Yellow Submarine uses cloud computing with reputable providers to store, back-up and allow internet access to all our data, including accounts, bookings, risk assessments, safeguarding information and supervision documents – in fact, the majority of electronic data.

Yellow Submarine has identified a potential risk around management staff becoming unable to work with no notice, due to illness, suspension or other causes. To mitigate this we have broadened the number of employees we have with management experience. The management team encourages employees to shadow one another's roles to make the charity as flexible and adaptable as possible.

The charity also recognises that, each flu season, the workplace is a location where everyone can help stop the spread of influenza. Steps towards this include practicing good health and hygiene habits. In the eventuality that an employee thinks they may have a contagious illness, plans are in place as described in Yellow Submarine's Staff Support and Infection Control Policies for the employee to withdraw from circulation until they are no longer contagious, for example by using a laptop and working from home, rather than risk bringing contagion to our members.

In the event of a full pandemic Yellow Submarine would rely on professional advice from services such as NHS Direct or the Department of Health to provide guidance as to what degree we can continue to provide services.



Business Continuity Plan

Emergencies

In the event of an emergency or serious incident the senior management team should be contacted as soon as possible. They will be able to advise on how best to manage the situation and put plans in place. They also act as Yellow Submarine's out of hours contacts.

Anna Cheetham [Co-Director] 07979 151975

Kate Sankey [Co-Director] 07890 087168

If the situation requires, then the emergency services should always be contacted, only then when it is safe to do so should senior management be informed. Staff should be prepared to ring 999 and state the emergency if needed.

When delivering community-based activities, in the event of an emergency staff will follow the procedures in place at the venue.

During sessions (where possible) we also display the 'in an emergency poster' to ensure that staff and volunteers have easy access to the senior management's contact details. If necessary, staff and volunteers should feel confident in contacting the emergency services and stating what has happened.

All contact details for staff, volunteers and members are kept up to date and are stored on our cloud computing, which staff have access to both in the office and whilst at sessions. Annually staff complete update forms which includes details of who they would like us to contact in an emergency.

Staff, depending on their role, will have specific responsibilities whilst at work for example designated first aider. Staff will be aware of their responsibilities and who they report to. Some staff will have completed specific training for a role, for example details of first aiders are displayed on site at Yellow Submarine as well as at sessions.

Yellow Submarine's policy pack is shared with staff on an annual basis alongside any update, that includes this policy. Full and part time staff [not including sessional workers] are asked to sign an annual declaration confirming that they have read the full policy pack and will act in accordance with our policies.



Property

Yellow Submarine currently have two main sites:

Charity Office & Café
12 Park End Street,
Oxford
OX1 1HH

Charity Café
1st Floor, Windrush Leisure Centre,
Witney,
OX28 4YA

For both properties we are tenants paying rent, so some of the responsibilities of maintaining the properties are shared between ourselves and our landlords. Their details are as follows:

Oxford site owned by Nuffield College
managed by Savills

Witney site owned by West Oxfordshire
District Council managed by GLL

Rob Stait (Regional Facilities Manager)
Savills,
Wytham Court,
11 West Way,
Oxford,
OX2 0QL.
Tel: 07980 769918
Email: rob.stait@savills.com

Matt Simmons (Partnership Manager – West Oxon)
GLL Head Office
Middlegate House
The Royal Arsenal
Woolwich
London
SE18 6SX
Tel: 01993 202020
Email: matthew.simmons@gll.org

Any serious concerns or ongoing maintenance issues will be reported without delay to the persons listed above, and where appropriate we will work with them to resolve any issues.

We maintain risk assessments for both sites and/or the activities that take place within them.

Site details

	Oxford	Witney
Fire risk assessment	Stored in the Oxford office	Maintained by GLL, we follow their procedures.
Site plan	Available on SharePoint and within the fire document wallet which is mounted at the bottom of the stairs.	Displayed in our Witney café office.
Electricity	SSE Tel: 0345 7252526	Maintained by GLL.



	E.On Tel: 0808 501 5699	
Gas	N/A	Maintained by GLL.
Water	N/A [Billed by Savills as part of rental agreement any queries or concerns would be reported to them]	Maintained by GLL.
Telephone/internet	TalkTalk Tel: 0800 083 3003	TalkTalk Tel: 0800 083 3003
Insurers	See insurance overview on SharePoint (General) for details of policies including charitable activities, minibuses, buildings and Cafés.	See insurance overview on SharePoint (General) for details of policies including charitable activities, minibuses, buildings and Cafés.
Evacuation procedure and points	Displayed at the top of stairs and at fire call points.	Displayed in our Witney café office.
Premises security	Staff are responsible for the opening and closing of the building each working day. A closing procedure has been shared with staff and new team members will be shown this in their induction. No other tenants have access to the property, some entry areas are communal.	The café staff are responsible for closing the café and office securely each working day. GLL are responsible for the security of the building.

All staff could be responsible for the opening/closing of the building are trained in the procedure. Visitors and volunteers are always accompanied whilst on site and are asked to make themselves known upon arrival. Customers have limited access to the public facing areas of the building. Contractors where necessary will be trained in the opening/closing procedures, but where possible work will be completed during operational hours or with staff present.

We recognise that our neighbour's businesses are quite different from our own

Our neighbouring building contact details are as follows:

10 Park End Street	Efes Meze Bar	Vacant [building is owned by Nuffield College and managed
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		by Savills] Tel: 01865 267087 Email: rob.stait@savills.com
13 Park End Street	Central Backpackers	Tel: 01865 242288 oxford@centralbackpackers.co.uk
6-9 Hythe Bridge St, Oxford OX1 2EW	The Bridge / Spirit	Tel: 01865 242526 will@bridgeoxford.co.uk

Company equipment

We own and are responsible for maintaining a variety of equipment, staff are responsible for ensuring the equipment needed for an activity is in good working order and should report any breakages or maintenance issues to the senior management team. Where appropriate they will ensure that items are fixed and/or replaced.

Café equipment is maintained in accordance with food hygiene regulations and this is the responsibility of the café management team.

Details of key electronics are recorded on SharePoint, e.g. laptops, iPads, phones.

Data & IT Support

Yellow Submarine uses cloud computing which enables us to store documents electronically, share documents easily and gives the flexibility of working from home or away from the office.

For support maintaining our IT facilities we use reputable providers as a safeguard and would contact them directly should the need arise.

Antivirus Software	Microsoft Defender	Part of 365 installation
Cloud Computing	Microsoft SharePoint	Part of 365 installation
Domain Host [website & emails]	Siteground	https://www.siteground.com/
IT Hardware Support	Mister IT [Steve Preston]	Steve@MisterIT.co.uk Tel: 07791 799979 // 01865 559059
Website Maintenance	Wordpress	-
Website Maintenance Support	Lee Vanstone	https://www.leevanstone.co.uk/ Tel: 07870 987886
Website Protection	Sucuri	https://sucuri.net/



Where appropriate staff are offered a laptop, staff should report any concerns about their device or software to the Office Manager without delay. Staff are responsible for maintaining the anti-virus software installed and any updates required.

Staffing

Should a staffing crisis arise, we have recruited staff who are able to adapt to take on additional roles should it be necessary – for example they have the adequate training and access to resources to lead activities etc. In a scenario when cover was not possible, for example to cover short term illness, we would consider altering plans to ensure activities can continue to run safely and the cancellation of activities if necessary or approaching a local social care recruitment agency as a temporary solution. This, however, would be as a last resort as we feel our current staffing levels are adequate to cover any short-term absences.

Recruitment agency: <https://completelycare.co.uk/contact-completely-care/oxfordshire/>; tel: 01865 727 751

Policy Reviewed by: Kate Sankey

Date Reviewed: 28th January 2025

Next Review: January 2026



Data Protection Policy v2.4

Data protection registration

Yellow Submarine Holidays - Z2783542

Yellow Submarine needs to collect and use certain types of information about those that use and engage with the charity in order to carry out our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the Data Protection Act 2018. This may include but is not limited to, staff, volunteers, members, fundraisers/donors, customers.

Data Controller

Yellow Submarine is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

Disclosure

Yellow Submarine may share personal data with other agencies such as the local authority, funding bodies and other voluntary agencies.

In most circumstances the individual will be made aware how and with whom their information will be shared. There are circumstances where the law allows Yellow Submarine to disclose data (including sensitive data) without the data subject's consent. These are:

- a) Carrying out a legal duty
- b) Protecting vital interests of an Individual/Service User or other person
- c) The Individual/Service User has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice, or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e., race, disability, or religion
- f) Providing a confidential service where the Individual/Service User's consent cannot be obtained or where it is reasonable to proceed without consent: e.g., where we would wish to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.



Yellow Submarine regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those we work with.

Yellow Submarine intends to ensure that personal information is treated lawfully and correctly.

Principles of Data Protection

Yellow Submarine will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 2018. Specifically, the Principles require that personal information:

- (a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').



Yellow Submarine will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken
 - The right of access to one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information)
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation, or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

Data collection

Informed consent is when:

- An individual clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Yellow Submarine will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Yellow Submarine will ensure that the individual:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the individual decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

Data Storage



Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers, as necessary.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is Yellow Submarine's responsibility to ensure all data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

Data access and accuracy

All individuals have the right to access the information Yellow Submarine holds about them. Yellow Submarine will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Yellow Submarine will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it holds, manages and uses personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

Data Subject Access Request [DSAR]

The GDPR (General Data Protection Regulation) creates Rights for Data Subjects as well as strengthening existing Rights. As a Data Controller, Yellow Submarine must be able to comply with these Rights. The GDPR provides the following Rights for individuals:

- 1.1. Right of Access (Also known as a Subject Access Request) (Such requests must be dealt with within 1 calendar month)
- 1.2. Right to Rectification (Under GDPR must be dealt with without undue delay)



- 1.3. Right to Erasure (Under GDPR must be dealt with without undue delay)
- 1.4. Right to Restrict Processing
- 1.5. Right to Data Portability
- 1.6. Right to Object
- 1.7. Rights in Relation to Automatic Decision Making and Profiling

More information on Yellow Submarine's DSAR procedure can be found on SharePoint – HR Workspace.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)). Any data breaches will also be reported/shared with any funding partners, as necessary.

However the breach has occurred, the Data Breach Process must be followed immediately (SharePoint – see HR Workspace). The individual who has identified the breach must notify Head Office. A record of the breach should be created using the following documents:

Data Breach Incident Form
Data Breach Log, to be completed by Head Office
Data Breach Flowchart

(All can be found on SharePoint; HR workspace)

This policy will be updated as necessary to reflect best practice in data management, security, and control and to ensure compliance with any changes or amendments made to the Data Protection Act 2018.

In case of any queries or questions in relation to this policy please contact Yellow Submarine's Data Protection Officer:

Kate Sankey
01865 236119
gdpr@yellowsubmarine.org.uk

Glossary of Terms

Data Controller – The person who (either alone or with others) decides what personal information Yellow Submarine will hold and how it will be held or used.
Data Protection Act 2018 – The UK legislation that provides a framework for responsible behaviour by those using personal information.



Data Protection Officer – The person(s) responsible for ensuring that Yellow Submarine follows its data protection policy and complies with the Data Protection Act 2018.

Individual/Service User – The person whose personal information is being held or processed by Yellow Submarine for example: a client, an employee, or supporter.

Explicit consent – is a freely given, specific and informed agreement by an Individual/Service User in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Notification – Notifying the Information Commissioner about the data processing activities of Yellow Submarine, as certain activities may be exempt from notification. The link below will take to the ICO website where a self-assessment guide will help you to decide if you are exempt from notification: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/exemptions/a-guide-to-the-data-protection-exemptions/>

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 2018.

Processing – means collecting, amending, handling, storing, or disclosing personal information.

Personal Information – Information about living individuals that enables them to be identified – e.g., name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within the charity.

Sensitive data – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings

Policy Reviewed by: Kate Sankey

Date Reviewed: 28th January 2025

Next Review: January 2026



Environmental and Sustainability Policy v2.1

Yellow Submarine acknowledges the connection between our climate and other environmental crises, and the threat of current and potential future homelessness, disease, destruction of biodiversity, food and water shortages and poverty for millions of people around the world. Yellow Submarine recognises its responsibility to reduce its own carbon and environmental footprints.

The Board of Trustees of Yellow Submarine therefore formally commits itself to being an environmentally responsible organisation. To take this forward it commits to the following actions:

Management

1. The Board mandates the senior management team to take executive responsibility for implementing this commitment and report on progress made.
2. Progress on improvement of Yellow Submarine's environmental performance will be discussed at senior staff meetings.
3. Induction training for all employees will outline employees' responsibilities to operating in an environmentally friendly way.
4. Yellow Submarine will seek to have relevant environmental clauses included in all future contracts agreed with outside bodies.
5. Yellow Submarine will seek to make all its current and future premises as energy and water efficient as practical and will work to eliminate all waste to landfill/incineration and seek to avoid creation of waste in the first place. Yellow Submarine will work with its Landlord to ensure this can take place.
6. Yellow Submarine will observe environmental legislation as a minimum standard and seek to out-perform current legislative requirements.
7. Yellow Submarine will develop and maintain a sustainable transport policy, seeking to reduce unnecessary travel and making the transport that is necessary as sustainable as possible.

Policy Reviewed by: Kate Sankey
Date Reviewed: 28th January 2025
Next Review: January 2026



Green Purchasing Policy (Appendix I)

Yellow Submarine commits itself to operate an environmentally friendly purchasing policy that requires employees to judge any purchasing decisions based on a green purchasing hierarchy:

Reduce: Yellow Submarine will firstly question whether a purchase is strictly necessary and, if it is, whether the amounts required could be reduced or combined with other purchases to reduce transport miles.

Where possible, staff will aim to purchase less plastics, particularly disposables. The Yellow Submarine cafes are committed to using recyclable disposables e.g. takeaway cups, and encourage the use of reusable items where possible.

Re-use: Secondly it will seek to buy re-used items in preference to new items where practical.

Recycle: If new items have to be purchased, Yellow Submarine will investigate whether or not there is a feasible option of buying products made locally from recycled materials or from a more energy efficient model.

Yellow Submarine aims to purchase sustainable wood and fish products with FSC (forest stewardship council) or MSC (Marine stewardship council) certification.



Reserves Policy v1.1

The charity maintains a reserves balance in a bank account separate from its day-to-day current account. The target reserves balance is calculated and agreed by the Trustees annually. The calculation has two strands.

The first strand is risk-based, and assesses the likelihood and potential financial impact of a number of risks. An appropriate reserves balance is determined based on the prudent overview of the risks identified.

The second strand reviews the historic and forecast levels of spending by the charity and calculates the reserves balance that would be needed to continue to provide support for a period of at least three months in the event that all further funding ceased.

The second strand is considered to be prudent because:

- in addition to the reserves balance the charity has a day-to-day operational 'current account' from which it could fund its activities for a period of time; and
- the charity has a number of funding streams and it is highly unlikely that all funding streams would cease simultaneously.

The reserves balance is agreed by the Trustees after reviewing the level of reserves indicated by each of the two calculation strands. The adequacy of the agreed reserves balance is reviewed at each Trustee meeting. The agreed policy is for reserves to cover three months of running costs.

Policy Created by: Tim Hamer

Date Enacted: November 2017

Policy considered by trustees at each board meeting.



Complaints Policy v1.7

At Yellow Submarine we hope that everyone enjoys their time with us, and that everything will be to your satisfaction. However, occasionally things go wrong or may not be as you wish, and you may want to make a complaint. This policy outlines procedures for how to make a complaint.

When should I complain?

Ideally, you should let the person who is supporting you at an activity or serving you in one of our cafes know straight away if you are not happy about something. That way, they can do something about it quickly and help to resolve the issue.

However, we know that some people do not feel confident enough to complain in person, or there might be another reason why you do not want to complain about something. It is ok to ask someone to complain on your behalf, like a family member, friend, or support worker.

Yellow Submarine takes all complaints seriously, and you should never ever feel bad for saying something if you are unhappy. You will not be treated differently or badly if you say something. We want to know if something has gone wrong, so we can put it right. If you do not say something at the time, you should try to let us know as soon as possible afterwards. Complaints should normally be made within a few days of the event you are complaining about or as soon as the matter first came to your attention.

How to Complain

You can contact us by phone on 01865 236119, via email to complaints@yellowsubmarine.org.uk or to

Yellow Submarine Holidays,
12 Park End Street,
OXFORD OX1 1HH

If you telephone us, the complaint will be written down by whoever you speak to. Whoever takes your call will attempt to resolve the issue for you, or if they cannot, they may ask the person who was leading your activity or who served you to speak to you. If you are not happy with what they say at this stage, you can submit a formal complaint in writing.

If your complaint is in writing (including email) we will acknowledge we have received it and it will be given to the relevant senior employee (for example the line manager of the employee, you initially approached or the senior management team).

It is our intention that complaints will be responded to within seven working days. If a full response cannot be given within seven working days (e.g., when a matter is very complex or



where we must consult a third party on the matter) you will be informed of the progress being made with your complaint.

If for any reason you don't feel comfortable making your complaint to a Yellow Submarine employee, you can contact the Yellow Submarine chair of trustees.

Current Chair of trustees: Toby Staveley

Contact details: chair@yellowsubmarine.org.uk

In relation to our Young people's services, you can also contact Oxfordshire County Council, who commission the activities, with any concerns. We are commissioned as a Short Breaks provider for disabled children.

For concerns relating to safeguarding allegations against Yellow Submarine staff or volunteers please see our safeguarding policy or whistleblowing policy for how these concerns should be managed/escalated.

How we will respond to your complaint

If you include your telephone number, then we will call you within 3 days. It is always better to talk things through and sort them out quickly if we can.

If your complaint was made by email, we will endeavour to acknowledge your email within 3 working days. If we only have your postal address, you will receive written acknowledgement within 10 days of receipt of your complaint. We will tell you who is dealing with your complaint and when we expect to respond to you in full.

What we will do if your complaint is found to be justified.

If your complaint is upheld, then we will offer an explanation and do everything we can to rectify the situation. The senior management team or, in some more serious circumstances the trustees, will be informed and will decide what further action is needed based upon your wishes.

Policy Reviewed by: Kate Sankey

Date Reviewed: 30th January 2025

Next Review: January 2026



Confidentiality policy v1.7

Yellow Submarine holds the personal information of our employees, volunteers and members with the greatest respect. This policy statement is supported by guidance for employees which:

- introduces the concept of confidentiality and the duty of confidence.
- demonstrates the practical safeguards that should be put into place.
- provides a detailed description of the main legal requirements relating to confidentiality.

All employees and volunteers will be made aware of their responsibility to maintain the confidentiality of those members they work with. This will be part of their induction training on joining Yellow Submarine and forms part of the staff and volunteer code of conduct.

This policy statement applies to all personal, identifiable information, whether written, computerised, visual or on audio record, or simply held in the memory of an employee. It applies equally to employees in permanent, temporary, or voluntary positions.

Yellow Submarine holds information about individuals and families that may be private and sensitive. Information is collected to provide care to individuals and generally must not be used for other purposes without the individual's informed knowledge and permission. In the absence of the ability to give informed consent, this consent can be given by the person's next of kin, carer, family, or those with parental responsibility on their behalf.

In the same way, information about employees, which is processed for the purpose of their employment, will be treated as confidential. Confidentiality should only be breached in exceptional circumstances and with appropriate justification, for example a safeguarding concern. All employees should ensure that the following principles are followed:

- Information, in whatever format, is effectively protected against improper sharing when it is received, stored, transmitted, or disposed of.
- Confidential information must only be accessed if it is appropriate to the job that the employee is employed to undertake.
- Every effort will be made to ensure that members understand how information about them will be used before they supply any confidential information.
- When members give consent to disclosure of information about themselves, every effort will be made to make sure they understand what will be shared, the reasons for sharing this information, and the likely consequences.
- Members will be assisted to understand when information about them is likely to be disclosed to others involved in their care, and members should be given the opportunity to withhold permission.

Withholding permission to share information.



If a service user does not consent to information about them being shared with other people, or if they give permission and then retract it, this decision should be respected in line with GDPR regulations.

The only exceptions to this are when:

- Someone is, or could be, put at risk.
- When a crime is being or is about to be committed.
- When information is requested by law enforcement agencies such as the Police or the Legal Justice System.

In these circumstances, Yellow Submarine's duty of care to the organisation, its members' safety and the wider community will take precedent.

When Yellow Submarine is required to disclose confidential information, the organisation will only release as much information as is necessary for the purpose. The person to whom the information relates will be informed of this decision as soon as possible, provided there is no compelling reason as to why they should not be informed. Yellow Submarine will ensure that the individual to whom information is disclosed understands that it is given to them in confidence which they must respect as far as possible within the remit of their role. If any employee or volunteer has any doubts at all about sharing information, they should not share it, and should discuss with their line manager.

As per the principles outlined above, any sharing of information should be in the most appropriate and secure manner; for example, using SharePoint to share reports internally (within Yellow Submarine) or [Egress](#) (Egress Switch allows secure email communication) to share confidential information with other professionals, where possible. Only necessary and appropriate information will be shared, and information concerning individuals who are unconnected will be anonymised or redacted, as appropriate.

If a disclosure of abuse is made by a child or young person, it is important for everyone to understand that they must not promise confidentiality as this may compromise the safety of the child or young person. For additional advice on appropriate information sharing see the OSCP's guidelines on information sharing (OSCP advice on Information Sharing – [here](#)).

All staff and volunteers are to read and sign the Yellow Submarine essential policy document, which includes a confidentiality statement, as part of their induction. Breaches of confidentiality could be regarded as gross misconduct and may result in serious disciplinary action. In a practical sense all staff and volunteers will be reminded of the importance of maintaining the integrity of confidential information during session briefings and debriefs e.g., returning any physical information (e.g., grab sheets) at the end of sessions and reporting any concerns as soon as possible through the appropriate channels.

Policy Reviewed by: Kate Sankey

Date Reviewed: 30th January 2025

Next Review: January 2026



Disciplinary and Dismissal Procedure v1.7

It is Yellow Submarine's policy that the following procedure should be followed when an employee is being disciplined or dismissed. The procedure provides that in most cases an employee will be given a series of warnings before disciplinary penalties (e.g. demotion or dismissal) is contemplated.

Matters which may be dealt with under this disciplinary and dismissal procedure include discipline and dismissal for the following reasons:

- misconduct
- sub-standard performance
- harassment or victimisation
- misuse of company facilities including computer facilities (e.g. email and the internet)
- poor timekeeping
- unauthorised absences

Minor cases of misconduct and most cases of poor performance may be dealt with by informal advice, coaching and counselling. An informal oral warning may be given, which does not count as part of the formal disciplinary procedure. No formal record of this type of warning will be kept.

If there is no improvement or the matter is serious enough, employees will be invited to a disciplinary meeting at which the matter can be properly discussed. The employee will be informed in advance that the meeting is a disciplinary one, and the employee will be invited to bring a work colleague or trade union representative to the meeting. The outcome of the meeting will be communicated to you. There are the following possible outcomes:

Written warning

If the infringement is more serious or there is no improvement in conduct/performance after an informal oral warning the employee will be given a formal written warning giving details of the complaint, the improvement or change in behaviour required, the timescale allowed for this, the right of appeal and the fact that a final written warning may be given if there is no sustained satisfactory improvement or change. A copy of the written warning will be kept on file but will be disregarded for disciplinary purposes after a specified period (e.g., 12 months).

Final written warning

Where there is a failure to improve or change behaviour while a prior formal written warning is still in effect, or where the infringement is sufficiently serious, an employee may be given a final written warning. This will give details of the complaint, warn that failure to improve could lead to dismissal and refer to the right of appeal. The final written warning will be kept on file but will normally be disregarded for disciplinary purposes after a specified period (e.g., 12 months).



Dismissal

If an employee's conduct or performance still fails to improve, the final step will be to contemplate dismissal, or taking action short of dismissal, e.g., demotion. If Yellow Submarine is contemplating dismissing an employee or applying some other disciplinary penalty, they will begin the following procedure:

Step 1: Yellow Submarine will give the employee a written statement and call a meeting to discuss the matter.

Yellow Submarine will set out in writing the employee's alleged conduct, characteristics or other circumstances which led the organisation to contemplate dismissing or taking disciplinary action against the employee. Yellow Submarine will also set out the basis on which they have made the allegations against the employee. If possible, Yellow Submarine will provide the employee with copies of any relevant evidence against them. Yellow Submarine will then invite the employee to a hearing to discuss the matter.

Step 2: A meeting is held and Yellow Submarine will inform the employee of the outcome

The meeting will take place before any disciplinary action, other than suspension on full pay, is taken. The meeting will be held without undue delay but only when the employee has had a reasonable opportunity to consider their response to Yellow Submarine's written statement and any further verbal explanation, we they may give. The employee must take all reasonable steps to attend the meeting.

After the meeting Yellow Submarine will inform the employee of their decision and notify them of their right to appeal if they are not satisfied with it.

Step 3: Appeal against the disciplinary decision if necessary

If the employee wishes to appeal, they must inform their line manager in writing within a reasonable time.

If this is the case, Yellow Submarine will invite the employee to attend a further meeting. The employee must take all reasonable steps to attend the meeting. If practicable a more senior manager not previously involved in the disciplinary procedure will hear the appeal.

The appeal hearing may take place before or after dismissal or disciplinary action has taken effect. After the appeal hearing Yellow Submarine will inform the employee of their final decision and confirm it in writing as soon as practicable.

Gross misconduct

If, after investigation, it is confirmed that the employee has committed one of the following offences (the list is not exhaustive), you will normally be dismissed:



- theft
- fraud and deliberate falsification of records
- physical violence
- bullying or harassment
- deliberate damage to property
- insubordination
- misuse of an organisation's property or name
- bringing the employer into disrepute
- incapability whilst on duty brought on by alcohol or illegal drugs
- negligence which causes or might cause unacceptable loss, damage or injury
- serious infringement of health and safety rules
- serious breach of confidence (subject to the Public Interest (Disclosure) Act 1998)

While the alleged gross misconduct is being investigated, the employee may be suspended, during which time they will be paid. Suspension is not a disciplinary action and does not mean you are being pre-judged. In most cases any decision to dismiss will be taken only after Yellow Submarine has fully investigated the matter and has invited you to a meeting to discuss it. If the employee is dismissed, they retain the right to appeal against Yellow Submarine's decision.

General principles applicable to the procedures

The following principles apply to the dismissal procedure set out above:

- The relevant manager and chair of trustees have the authority to discipline an employee in accordance with this procedure.
- The employee has the right to be accompanied to any meeting by a trade union representative or co-worker.
- Each step in the procedure will be taken without unreasonable delay and meetings will be held at reasonable times and locations. Meetings will be conducted in a manner that enables both Yellow Submarine and the employee to explain their cases.
- Yellow Submarine will keep records detailing the nature of any breach of disciplinary rules or unsatisfactory performance, the employee's defence or mitigation, the action taken and the reasons for it, whether an appeal was lodged, its outcome and any subsequent developments. Yellow Submarine will keep these records confidential.
- Where appropriate, the employee's disciplinary record can be shared with future employers for reference purposes.

Advice in maintaining this policy and procedure is taken from [ACAS](#) and the [ACAS Code of Practice on Disciplinary and Grievance Procedures](#).

Policy Reviewed by: Kate Sankey

Date Reviewed: 30th January 2025

Next Review: January 2026



Drug and Alcohol Abuse Policy v1.6

Yellow Submarine recognises that alcohol and drug abuse related problems are an area of health and social concern. It also recognises that an employee with such problems needs help and support from their employer. The organisation also recognises that alcohol and drug abuse problems can have a detrimental effect on health and safety, work performance and behaviour. Yellow Submarine has a responsibility to its employees and members to ensure that this risk is minimised.

Accordingly, Yellow Submarine's policy involves two approaches:

- Providing reasonable assistance to the employee with an alcohol or drug abuse problem who is willing to co-operate in treatment for that problem.
- Disciplinary rules, enforced through disciplinary procedures, where use of alcohol or drugs (other than on prescription) affects safety, performance or behaviour at work, and where either (1) an alcohol or drug dependency problem does not exist or (2) where treatment is not possible or has not succeeded.

Yellow Submarine does not provide or arrange treatment or other forms of specialist assistance. Such services are provided by GPs, hospitals and other agencies (generally through the NHS). Through this policy the organisation will seek both to assist an employee in obtaining such specialist help, and to protect his or her employment where possible.

Assistance for an employee.

Yellow Submarine will, where possible, provide the following assistance to an employee:

- Helping the employee to recognise the nature of the problem, through referral to a qualified diagnostic or counselling service.
- Support during a period of treatment. This may include; a period of sick leave or approved other leave; continuation in post or transfer to other work, depending upon what is appropriate in terms of the employee's condition and the needs of the organisation.
- The opportunity to remain or return to work following the completion of a course of treatment, as far as is practicable, in either the employee's own post or an alternative post.

Yellow Submarine's assistance will depend upon the following conditions being met:

- A doctor's diagnoses of an alcohol or drug dependency related problem.
- The employee recognises that they are suffering from an alcohol or drug abuse problem and is prepared to co-operate fully in referral and treatment.



Yellow Submarine and its employees must recognise the following limits to the assistance the organisation can provide:

- Where an employee fails to co-operate in referral or treatment arrangements, no special assistance will be given and any failure in work performance and behaviour will be dealt with through the Disciplinary Procedure
- If the process of referral and treatment is completed but is not successful, and substandard work performance or behaviour occurs, these will be dealt with through the Disciplinary Procedure
- An employee's continuation in his/her post or an alternative post during or after treatment will depend upon the needs of the organisation at that time.

Disciplinary Action

In line with Yellow Submarine's disciplinary rules, the following will be regarded as serious misconduct:

- Attending work and/or carrying out duties under the influence of alcohol or drugs, including the continuing effects of alcohol consumed earlier in the day, the previous day or the previous evening.
- Consumption of alcohol or drugs whilst on duty (other than where prescribed or if approval has been given).

Breach of these rules will normally result in dismissal, and only in exceptional cases will either a notice period or the reduced disciplinary action of a final written warning be applied.

Where a breach of these rules occurs, but it is established that an alcohol or drug abuse related problem exists, and the employee is willing to co-operate in referral to an appropriate service and subsequent treatment, Yellow Submarine will suspend application of the disciplinary procedure and provide assistance as described above. Employees who do not comply with the treatment suggested or continue to abuse alcohol or drugs will be subjected to the application of the Disciplinary Policy.

Policy Reviewed by: Kate Sankey
Date Reviewed: 30th January 2025
Next Review: January 2026



Equality, Diversity and Inclusion Policy v2.1

Yellow Submarine is committed to the promotion of equality of opportunity in its training and employment practices, and seeks to ensure that no employee, volunteer, member of the public including customers, job applicant or users of Yellow Submarine's services (including potential members) receives less favourable treatment on the grounds of any "[protected characteristics](#)".

The Equality Act 2010 also protects people who are associated with a person with a protected characteristic, for example, a person caring for a disabled child or relative. They will be protected by virtue of their association to that person.

These protected characteristics include:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

Everyone has the right to enjoy their basic human rights such as right to life and not be treated in an inhuman or degrading manner, protected by the Human Rights Act 1998.

Yellow Submarine will not treat people with disabilities less favourably with regard to employment. Yellow Submarine will provide [reasonable adjustments](#) for trainees, volunteers, employees and potential employees in accordance with the Equality Act 2010.

Yellow Submarine will induct and train their employees to make clear that Yellow Submarine will not tolerate any form of harassment or disrespectful treatment towards employees, members, volunteers or anyone else involved in the organisation, directly or indirectly. As part of Yellow Submarine's Safeguarding Policy, all members, employees and volunteers will be made aware that all people involved in the organisation are protected by this policy, and that inequality constitutes an abuse of an individual's rights.

Further training is provided to uncover, understand and address issues around stereotyping, indirect discrimination, bullying, organisational/institutional discrimination and in particular the issues affecting our members with disabilities.

Yellow Submarine will do everything practicable to make their premises accessible and overcome physical barriers to being involved in the organisation. This principle will apply to



access to training, selection, training provision, pay, benefits, procedures, and all terms and conditions of employment.

This policy will be brought to the attention of every trainee, employee, job applicant, potential or actual member of Yellow Submarine's services and will be kept under review. Yellow Submarine recognises its obligations under the Equality Act 2010. Yellow Submarine is committed to a programme of positive action to make this policy fully effective.

Equal Opportunity Lead: Kate Sankey

More advice and information can be found on the [Equality and Human Rights Commission](#):
As well as on the ACAS website; [discrimination and bullying in the workplace](#)

Policy Reviewed by: Kate Sankey
Date Reviewed: 28th January 2025
Next Review: January 2026



E-Safety Policy v1.9

Yellow Submarine recognises that the welfare of all young people and vulnerable adults is paramount and that all young people and vulnerable adults have equal rights of protection. Yellow Submarine has a duty of care when young people and vulnerable adults are engaged with the organisation and will do everything it can to provide a safe and caring environment.

Yellow Submarine promotes the highest standard of Safeguarding practice across all of our activities with our members, their families and/or carers and understand that for most people engaging with online content has become a part of everyday life. Yellow Submarine will apply this policy in all aspects of its work when anyone in our organisation is accessing any form of digital or electronic communication, this includes but is not limited to the internet, mobile phones, messaging services, apps, games, photography or videos. This policy should be read in conjunction with our Safeguarding and Photography Policies. It is the role of the safeguarding lead to ensure that this policy is adhered to and communicated to all staff and volunteers.

As a result of the pandemic Yellow Submarine has increased the number of online activities all of these have been risk assessed accordingly to ensure the necessary safeguards are in place.

Lead and Deputy for Safeguarding

Safeguarding Lead: Kate Sankey; tel: 07890 087168; kate@yellowsubmarine.org.uk

Deputy Safeguarding Lead: Toby Staveley (Chair of Trustees) or Anna Cheetham; tel: 01865 236119

Their role is to oversee and ensure that Yellow Submarine's E-Safety policy is fully implemented. This includes ensuring they and all employees receive E-Safety information and Safeguarding training as appropriate. The Deputy should be available to support or cover for the nominated Lead. They will also handle any complaints or allegations against the nominated Lead, if appropriate. This policy will be made available to all at Yellow Submarine, including our members, through training sessions, posters, the Yellow Submarine website and employee induction handbook.

Yellow Submarine E-Safety Code of Conduct

Yellow Submarine expects employees, volunteers and members in our organisation to agree and adhere to our code of conduct:

- Use the internet and other forms of communication in a sensible and polite way.
- Only access websites, send messages or access and use other resources that will not hurt or upset anybody.
- Seek permission if you want to use personal information or take photographs of other people.
- Report any concerns to the Lead or Deputy for E-Safety immediately.



- Be clear that an adult in a position of responsibility cannot maintain confidentiality if there is a concern about the welfare of a young person or vulnerable adult.

What might we be concerned about

A young person or vulnerable adult who:

- is becoming secretive about where they are going to or who they are meeting.
- will not let you see what they are accessing online.
- is using a device with a video camera in a closed area, away from other people.
- is accessing the internet or using a device for long periods and at unusual or late hours.
- clears the computer history every time they use it.
- receives unexpected money or gifts from people you don't know.
- shares an inappropriate amount of information online.
- meets up with people they do not know.
- is secretive, impulsive, or indiscriminate about who they converse with.
- displays a sudden change in behaviour or wellbeing.

As an organisation we would exercise discretion when thinking about whether some of the points listed above are points of concern for individual members. For example, accessing a Zoom session from a private living room would not be a cause of concern, however it would be from a bathroom.

An adult who:

- befriends a child/children online or through any kind of messaging service.
- has links to children they know in a professional capacity on their personal social network sites, especially if they work in a position of care such as a sports coach or youth worker.
- is secretive about what they are doing and who they are meeting.

What do I do if I'm concerned?

If you have any concerns, speak to the lead person for safeguarding immediately. This may require you to fill out an incident form noting your concerns.

If a young person or vulnerable adult is in **imminent danger**, always dial 999 for the police.

Do not delay

Do not investigate

Seek advice from the lead person for E-Safety

Make a note of anything you observe or are told.

Minimising the Risks



Yellow Submarine will:

- Talk to members about what they are accessing online.
- At activities keep the computer(s) and internet enabled devices in a general space where we can monitor what is going on.
- Maintain filters on internet settings at Yellow Submarine's premises reducing access to explicit or inappropriate sites e.g. filters blocking pornography, websites that promote violence/the use of weapons and websites that promote suicide and self-harm.
- Regularly check equipment to ensure that is being used appropriately and is well maintained.
- Explain the risks of giving out personal details online.
- Encourage members to think carefully about what photographs or videos they sharing online and how they can be accessed.
- Talk about how, when information or images get on to the internet, this can be difficult to erase.
- Advise members to only message or chat with people they know.
- Talk about how to identify spam messages or junk mail and how to delete them. This also applies to messages from people they do not know, or opening attachments.
- Discuss how people can hide their identities online and the importance of not meeting new online "friends" in real life, or exercising caution when doing so, ensuring that appropriate safeguards are in place.
- Look on the internet together for information about how to deal with or report problems.
- Make sure members understand they can always talk to Yellow Submarine employees or their parents and/or carers about anything that makes them feel uncomfortable.

The following sites have lots of information on staying safe online and reporting concerns:

[Safe Child](#)
[CEOP](#)
[OSCP](#)
[Childline](#)

Yellow Submarine have also compiled a list of online resources which offer support and advice on how to stay safe online – this can be found on SharePoint

For additional information on Social Networking please see: Social Networking Supplement.

Policy Reviewed by: Kate Sankey

Date Reviewed: 28th January 2025

Next Review: January 2026



Social Networking (Supplement to E-Safety)

Policy v1.9

In response to increased social networking Yellow Submarine has developed the following guidelines for employees and volunteers. This is intended to promote the safety of children, vulnerable adults, volunteers and employees from any risks associated with using social networking sites. Please see E-Safety Policy for additional information regarding Internet usage. The below guidelines will be communicated to staff and volunteers as part of their induction.

Guidelines:

- Yellow Submarine stipulates that neither employees nor volunteers add/follow children they know in a professional capacity on their personal social network sites.
- In the event that an adult member (18+) asks a volunteer if they would like to connect on social media, it is up to the volunteer if they wish to or not. Yellow Submarine employees will support volunteers if they wish to politely decline this offer. As a guide, Yellow Submarine employees do not give out their personal profiles, but use an organisational profile.
- All volunteers under the age of 18 or volunteering through their school, college or university should not accept requests to connect via social media from members. Employees will support volunteers to decline this offer.
- If a volunteer does use social networking sites and agrees to exchange details with adult members, they must acknowledge that their online behaviour is open to scrutiny. Volunteers are directed by Yellow Submarine to follow these simple guidelines:
 - Only converse with adult members publicly (e.g. for Facebook, post messages on their wall only, do not send private messages)
 - Do not post pictures of yourself in compromising situations or make comments which bring may bring your character or Yellow Submarine into question. Be aware of other people 'tagging' you in their pictures etc.
 - Set your privacy settings to 'high' or give access to a limited profile so that YS members or their families cannot see anything that would reflect badly on you as a volunteer. If you require assistance to do this please contact Yellow Submarine on 01865 236119.
 - If you do add adult members to your profile, or accept their friend request, please let Yellow Submarine know. We will check on the arrangement periodically to ensure the safety of both the members and the volunteer.



- Yellow Submarine employees use Facebook and other forms of social media as a communication tool and acknowledge the benefits to this as well as the risks. In order to do this and maintain boundaries Yellow Submarine staff have organisational profiles separate to any personal profiles. For these profiles, Yellow Submarine employees will share their log-in details with the safeguarding lead so that their actions are open to scrutiny. Yellow Submarine employees are expected to keep all communications with members for future reference, and to not delete any communications from their organisational profile.

All questions and concerns should be referred to the Safeguarding Lead without delay, who is responsible for e-safety. Any inappropriate behaviour between staff/volunteers and Yellow Submarine members via social media or non-compliance with the above guidelines may result in disciplinary action.

Policy Reviewed by: Kate Sankey
Date Reviewed: 28th January 2025
Next Review: January 2026



Health and Safety Policy v1.8

This is the statement of general policy and arrangements for Yellow Submarine Holidays. Overall and final responsibility for health and safety is that of the Board of Trustees. Day-to-day responsibility for ensuring this policy is put into practice is delegated to Kate Sankey. All staff and volunteers are expected to be aware of their Health & Safety responsibilities and these are communicated to them as part of induction training. Staff and volunteers are expected to act in an appropriate way to keep themselves and others safe from harm and to report any concerns they have as swiftly as possible.

Statement of General Policy	Responsibility of:	Action/Arrangements
To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.	Kate Sankey	Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed every year, or earlier if working habits or conditions change.) Risk assessments are stored on SharePoint.
To provide adequate training to ensure employees are competent to do their work.	Kate Sankey	Health and Safety training is done for all staff and volunteers during induction. A briefing is given to all staff & volunteers at the start of an activity by the activity leader and attention will be drawn to any health & safety considerations. Additional training reviewed in conjunction with Oxfordshire County Council, OSCP, HSE requirements and other relevant organisations to ensure that staff have an appropriate level of training. We will ensure that suitable arrangements are in place to cover employees working remotely from the main office and trading sites.
To engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health.	Kate Sankey	Staff routinely consulted on health and safety matters as they arise but also formally consulted at regular health and safety performance review meetings (which form part of team meetings) or sooner if required. Sites away from the main office are also routinely checked and monitored.
To implement emergency procedures –	Kate	Escape routes well signposted and kept clear at all times.



evacuation in case of fire or other significant incident.	Sankey/Activity Leaders	Evacuation plans are tested regularly and updated as necessary. Evacuation plans are tested at sessions at least once per term and recorded in session reports. When using external venues, will follow site specific plans in accordance with their guidelines.
To maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances.	Kate Sankey	- Staff should report any broken or faulty equipment or fixtures as soon as possible and these will be addressed accordingly. - Toilets, washing facilities and drinking water provided. - Staff trained in safe handling of medication as required. See Medication Policy for further information regarding handling of medication. - Fire safety equipment onsite at 12 Park End Street is maintained by Executive Fire Protection; who service these on annual basis.
Health and safety law poster is displayed:	Kate Sankey	at 12 Park End Street, Oxford, OX1 1HH (Site of Main office & trading site)
First-aid box and accident book are located: Accidents and ill health at work reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) as required. For advice see: www.hse.gov.uk/riddor Tel: 0845 300 9923	Kate Sankey	First Aid kits present on all sites and taken on all activities. Accident forms are available on our cloud computing system and printed forms are available from the offices and present at activities.

Signed (Employer): Kate Sankey	Date: 3 rd February 2025
Subject to review, monitoring and revision by: Kate Sankey	Every: 12 months or sooner if work activity changes



We firmly believe that adequate provisions for Health and Safety are essential to working life. The maintenance of healthy and safe working conditions and the prevention of injuries and losses are not only of vital importance to the Charity's efficiency and success, but also in the best interests of all our employees, volunteers and users. We therefore aim to ensure that all employees and volunteers are fully aware of their responsibility for safety and of the safety rules which are relevant to their own jobs. On request we can provide up to date information about health and safety issues at work.

Accidents: First Aid

Any injury requiring treatment should be dealt with by one of the company's trained first aiders.

The names of first aiders should be displayed clearly at Yellow Submarine premises or, if on an activity outside the premises, the Activity Leader will clarify who the named first aider is during the pre-session briefing. If no first aider is available (or it is the first aider who is incapacitated) then other staff or volunteers can administer first aid - but only if confident in doing so and it is necessary. If in doubt ring the NHS on 111 for advice or, if appropriate, call 999.

All staff and volunteers should be aware of who to contact in an emergency.

Reporting accidents and incidents

You should report any accident or near-miss, however minor, to your line manager or the senior management team, who will ensure that all reported accidents or near-misses are entered on the accident log. In the event of a serious or notifiable accident or dangerous occurrence, it is essential that the Health and Safety Officer is located and advised as soon as possible, in order that suitable action is taken. During an activity it should be the senior staff member (Activity Leader) who is informed, who should then contact the Health and Safety Officer.

When an accident occurs, all activity leaders or café support staff should fill in the appropriate accident form with input from those involved/witnessing (staff, volunteers and members). This is done within 24 hours of the incident. The form is filled in and filed digitally. If it is an accident involving a member (young person or adult) the member's family/carers are to be made aware, in person or by phone or email and given a copy of the accident handover form. It is the activity leader's duty to pass this



information on to their line manager who will take it to further agencies should that be necessary. When appropriate, RIDDOR will be informed of injuries.

All accidents and incidents are reviewed at monthly at team meetings in order to identify trends that need to be risk assessed and staff need to be made aware of. More serious accidents may need to be investigated. Investigation involves the staff's line manager speaking to staff about the incident and possible causes or earlier instances that may have caused the incident. Should this be a serious incident or several accidents where a trend is obvious, the line-manager, activity leader and main staff for the project will have a meeting to discuss possible triggers and any risks that can be reduced further. This meeting can include the parents/carers of the member should that be advantageous. If a trend is noticed, risk assessments and plans will be put into place to prevent the incident or activities that may have started the incident.

Incidents (for example, behavioural issues or concerns), near misses, and potential health issues are recorded (digitally) on our incident form by the activity leader with whom the incident occurred. Activity leaders will consult witnesses when reporting. Reports will be passed on to line managers/senior management team and where appropriate carers, social workers and the safeguarding board. Incidents should be followed up by the senior management team or reporting activity leader, depending on their nature. The incident will be logged appropriately, should this be a safeguarding incident, the safeguarding log should be filled out.

Risk assessments are reviewed on a regular basis (before and after each activity, as well as in team briefings and meetings), in order to ensure that information gathered is shared with staff and volunteers and future practice is enhanced.

Yellow Submarine operates a no-blame culture: see Yellow Submarine's Whistleblowing Policy.

Fire Safety

Yellow Submarine recognises its duty of care to employees, volunteer and members when they are in our offices and on activities. As part of this, we recognise that the risk of fire is present and that employees, volunteers and members all have responsibility in minimising that risk where possible. The Health and Safety officer is Kate Sankey; other members of staff have been trained to act in the role of Fire Marshal.



It is the Health and Safety officer's responsibility to oversee regular fire drills and fix any reported fire hazards. They also oversee to regular updating of fire safety equipment and appropriate safety training of new employees. Posters to tell members and visitors or the fire safety procedures will be available in every room and updated regularly.

Responsibility in the event of a fire

1. Once an alarm has been raised, please exit the building using the nearest (most accessible) exit. This could be front or back. (For premises at 12 Park End Street please be aware that our meeting place is the lamp post in front of 11 Park End Street [old Mega Bet shop] so using the front exit is preferable if it is safe).
2. Staff running an activity are responsible to see that all of their staff and members exit the building.
3. Any staff member that is not involved in an activity is asked to assist members and clear rooms as they leave the building (including the toilets).
4. If any member of staff has a visitor, they are responsible for making sure that person exits the building and is accounted for to the Health and Safety Officer running the drill.
5. As the building clears, all staff are responsible to ensure doors are closed tightly behind them.
6. Once everyone has left the building, the Health and Safety Officer running the drill will check with each activity leader that they have all members and staff. They will meet at the current meeting place.
7. Once everyone is accounted for, the Health and Safety Officer will declare the building safe and allow everyone back in.

Further information about fire safety and a log of checks and drills can be found in the Yellow Submarine office, 12 Park End Street.

Key documents are stored on SharePoint and master copies of the accident and incident forms can also be found in the appendix. For relevant Health & Safety information see the HSE website: <http://www.hse.gov.uk/guidance/>

Policy Reviewed by: Kate Sankey

Date Reviewed: 3rd February 2025

Next Review: February 2026



Risk Assessment – for the workplace (Appendix I)

Risks in the workplace – identified as concerns at Yellow Submarine, specific venue or activity risk assessments can be found on Huddle

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by who?	Status
Injuries from trips and slips	Staff, members and visitors may be injured if they trip over objects, furniture, stairs and hard floors.	General good housekeeping. All areas well lit. No trailing leads or cables. Staff keep work areas clear, e.g. no boxes left in walkways, deliveries stored immediately, offices cleared of hazards each evening. Stair lights are left on at all times and stairs are marked with no-slip tape. Handrail is secure and members are encouraged to use it. Bathroom floor is cleared when wet and checked regularly throughout the day by staff. Handrails are fitted in the bathroom.	Continuous clearing of hazards. Furniture and equipment to be stored after each use. Loose wires to be attached to walls and floors.	All staff, supervisor to monitor.	Ongoing – staff to continue to monitor.
Electrocution due to	Staff, members and visitors	One extension lead may be attached per wall plug. This	Continue to ensure that one extension lead at a time is	All staff, supervisor to monitor.	Ongoing – staff to



overloaded sockets	may be electrocuted if sockets are overloaded.	lead should be tested for safety. Members are supervised when plugging in electrical equipment. Staff are aware of electrical appliances in kitchenette area and ensure that appliances are safe for usage.	plugged into one wall outlet. All electrical appliances must be monitored and electrical testing kept up to date.		continue to monitor.
Injury due to fall from height	Staff may be injured while operating projector at height. Staff and members could be injured if accessing storage at height.	Staff will not be allowed to work at height when it is unsafe to do so. When moving storage from height, staff will firstly make sure the room is safe. Staff must make sure that weight is evenly placed and under the maximum weight to carry. Staff should not move from height with boxes but pass them to others for safety.	Staff should be accessing height using a stable step ladder. A step ladder should be accessed and stored properly. Management should ensure that access to height is done properly following the Manual Handling Policy.	All staff, supervisor to monitor.	Ongoing – staff to continue to monitor.
Burns from hot water and kettle	Staff, members and visitors may be burned due to unexpected interaction with hot or burning liquid.	Kettle and hot water in toilets are marked as hot water. Staff oversee members using the kettle when they are not sure whether members are confident handling hot liquids.	Staff should continue to be vigilant and oversee members until they are confident that they understand hot water.	All staff, supervisor to monitor	Ongoing – staff to continue to monitor.



Injury or death due to fire	Staff, members and visitors could become trapped or endangered by risk of fire.	Fire exits are all clearly marked. Staff tell new visitors and members about fire exits, procedure and meeting point. Fire doors are to be kept closed in the event of a fire. During working hours doors are kept open with dorguards or closed if it is not possible to fit these – this is to ensure the safety of members likely to experience seizure activity or challenging behaviours so that staff can be alerted without delay.	Visitors and members should be continually reminded of emergency procedures. Fire procedures should be posted in each room and a meeting point to be decided. Emergency procedures are updated yearly and shared with staff and members.	All staff, supervisor to monitor	Ongoing – staff to continue to monitor.
Injury due to chemical access	Staff, members and visitors could hurt themselves with chemicals used for cleaning.	Chemicals are only used by staff and trainees with staff supervision/training and done so in a safe and correct manner (as described on the label).	Chemicals should be stored correctly from reach so that they cannot endanger members or visitors, particularly those that may not understand the risks (particularly away from common areas).	All staff, supervisor to monitor	Ongoing – staff to continue to monitor.
Injury due to nature of café work	Staff, members and visitors could be injured due to nature of work	Please see separate risk assessment for café work.	All café work is carried out by trained staff or by trainees with supervision. Please see café risk assessment for more information.	All staff, supervisor to monitor	Ongoing – staff to continue to monitor.



	done in the cafe				
Injury to those that do not know or understand the organisation risk assessment policy.	Members or visitors that do not know or understand the policy due to the risks they could be subject to, particularly if left alone.	Members and visitors will be supervised or taught the health and safety policy in an assessable format until staff are confident that they understand and can follow the Health and Safety Policy on their own.	Staff will continually support members and visitors to be aware of the Health and Safety rules in place. They will also bring it to the attention of the Health and Safety Officer if they think any training or supervision should be addressed with members.	All staff, supervisor to monitor	Ongoing – staff to continue to monitor.

Assessment Review Date: February 2025 (Usually within one year, or earlier if working habits or conditions change).



Infection Control Policy v1.7

Yellow Submarine aims to maintain the Health and Safety of its employees and volunteers and ensure that good practice is established and maintained by promoting good hygiene and infection control. This policy addresses the needs of the organisation to adhere to NHS' Delegated Health Care Tasks for the care of young people with additional health needs.

We cannot tell if other people are carrying an infection, and therefore we must treat all people in the same way - as if they were potentially infectious. Employees are required to report illness and infections to their line manager in line with the staff support policy.

NB. For any up-to-date guidance relating to COVID-19 please refer to our current activity risk assessment.

Hand Hygiene

Hand hygiene is the single most important method of preventing the spread of infection. The best way to do this is by hand washing, which must be carried out:

- When staff arrive at work and regularly throughout the day.
- After any situation which involves direct member contact (washing, assisting to move, assisting to use the toilet).
- Before and after caring for another person.
- Before preparing, handling or eating food.
- After visiting the toilet.
- Before and after wearing PPE.
- After cleaning or any other household tasks.
- Whenever hands are visibly dirty.
- After any possible micro-bacterial contamination.
- After handling contaminated laundry and waste.
- After handling or cleaning up after an animal.

Skin Care

If skin is broken or you have a skin condition, individuals are at greater risk of infection. Employees and volunteers should take care of their hands and inspect them frequently for cuts and scratches. All cuts and abrasions should be covered with a waterproof dressing, and members should be encouraged to do the same. All staff and trainees working within the café should cover any cuts with a blue or a black plaster/dressing and should wear gloves if they have any broken skin on their hands.

Employees and volunteers should ensure prompt investigation and treatment by their GP for any skin disorder such as dermatitis, eczema or psoriasis. If a skin condition leaves an employee, trainee or volunteer at particular risk, their role may be reviewed and duties altered to mitigate any risk.



Protective Clothing

Employees and volunteers must always carry out a risk assessment to establish if there is a risk of exposure to:

- Blood/body fluids
- Non-intact (broken) skin
- Mucous membranes
- Chemicals/hazardous substances

If this is established to be the case, then gloves and possibly an apron are required, if the individual cannot care for their own needs (for example needs help to apply a plaster).

Should any PPE be required to carry out a task then this will be provided by Yellow Submarine.

Gloves

Vinyl or nitrile gloves are suitable for most carers who assist people with personal hygiene/care; there may be times that Yellow Submarine staff need to support members with personal care – good hygiene should be promoted whilst maintaining the member's dignity. Staff should be aware of the following to reduce the risk of infection.

- Never re-use gloves.
- Gloves must be changed between members and between different activities for the same person.
- Employees and volunteers should always wash hands on removal.

Aprons

Yellow Submarine very rarely needs to use aprons to assist in dealing with a contaminant such as a bodily fluid. If they are used, employees and volunteers should never re-use, should wash hands following removal and dispose of the apron in normal refuse.

Eye and Face Protection

Since the COVID-19 pandemic face coverings may at times be mandatory or encouraged in some areas of our work, this may be due to government guidance or organisational risk assessments. Where face coverings are mandatory Yellow Submarine will provide these to staff, or staff are welcome to wear their own.

If there is a risk of fluids splashing into your face, masks or eye protection may be needed.

Spillages

Spillages of blood and bodily fluids and excreta may be hazardous to health and should be cleaned up promptly.



- Gloves must be worn, and where possible an apron.
- Absorb and remove spillage using disposable paper towels (kitchen roll/toilet paper).
- Wash area with general purpose detergent and hot water.
- Dry thoroughly.
- Dispose of all rubbish (including protective clothing worn) by double bagging and place in domestic refuse.
- Clean bowl or bucket used with detergent and dry thoroughly.

Waste

All of the items below may contain micro-organisms and may be disposed of the normal domestic waste if double bagged and free from excess liquid.

- Incontinence pads
- Wound dressings
- Tissues
- Sanitary Towels

Reduction of risk relating to infectious illnesses: As an organisation working with people with learning disabilities, Yellow Submarine recognises that some members access our services with accompanying medical conditions. Some of these conditions may leave them more vulnerable than the average population to diseases, infections and common illnesses such as flu and sickness bugs.

If an employee is ill with an illness that is infectious, such as colds, Covid-19, flu, sickness and diarrhoea, impetigo or anything else, they should in the first instance seek medical advice as to whether or not they are still considered contagious. This information should be passed to their Line Manager, in order that a decision can be made as to whether or not they can attend their place of work without putting any of our vulnerable members at risk. If employees are feeling well enough to return to work, or indeed perhaps were never absent from work, they may be reassigned to another work area temporarily, to minimise any risks. If in any doubt, employees should approach their Line Manager for further advice.

Information in relation to returning to work after a bout of diarrhoea or vomiting for those members of staff working in the café or where the staff member's role may involve the handling of food can be found [here](#). Yellow Submarine follows this guidance and the stipulation that Managers must exclude staff with these symptoms (diarrhoea and/or vomiting) from working with or around open food, normally for 48 hours from when symptoms stop naturally.

Policy Reviewed by: Kate Sankey
Date Reviewed: 4th February 2025
Next Review: February 2026



Lone Working and Home Visits Policy v1.6

The aim of this policy is to ensure that employees of Yellow Submarine are safe when attending meetings off-site, in particular, meetings that take place in the home of a member, their family, or any other private space.

Where possible, home visits and lone working should be avoided. However, Yellow Submarine recognises that some projects and the specific needs of members and their families may require this method of working. As Yellow Submarine's projects grow the need for more lone working within the community may also increase in order to best meet the needs of the members – in this instance the safety and welfare of the member and staff member are paramount.

The definitions of home visits and lone working for the purposes of this policy are as follows:

- **Home Visit:** a visit to the member's own home or to a family member/carer related to the member.
- **Lone Working:** any situation where a worker is alone with a member, potential member, potential employee or volunteer, or any other unknown person, other than a home visit.

The following are not considered to be lone working for the purpose of this policy:

- Being alone with an individual in a room when there are other people close by
- Being alone with an individual away from the office but in a public building, e.g., on an activity
- Being alone with a member in an outreach location when there are other people in the building and arrangements are in place for them to respond to a call for help e.g., working 1:1 with a member, as an enabler, on an activity day would not usually constitute lone working

This policy is designed to protect the safety of employees, volunteers and members. There are 3 types of risk: physical violence to workers, potentially damaging allegations being made against employees and the risk of injury or accident to employees where a person with a learning disability could be left without the support they need to stay safe.

Unaccompanied home visits are occasionally a necessary part of the work; when they take place this policy must be followed. If you find yourself unexpectedly in a lone working situation as defined by this policy e.g., another employee does not turn up to an arranged meeting with you and a member/potential member, first check if you can easily follow this policy. If not, you must contact your Line Manager immediately. The Manager will advise on the appropriate course of action and will arrange for any support you may need to do this.



This policy applies equally to paid employees and volunteers, provided that in the case of volunteers, the paid employee supervising their work has authorised the home visit or lone working. No worker will be expected to carry out lone home visits or lone working if they feel uncomfortable, unsafe or if they do not wish to for any other reason.

The procedure for home visits or lone working is as follows:

In advance of a first-time home visit:

- First check if it is possible to deal with the member/family's query by phone, especially where the member is self-referring. It may also be appropriate to take some holding action on behalf of the member if there is likely to be a delay before the visit is made. As far as is appropriate, attempt to facilitate the individual getting to the offices/or designated public place in normal office hours.
- Before carrying out a home visit the worker must have had some previous contact with the member to gather information, e.g., a telephone conversation, a conversation with a third-party referrer, which should enable the worker to judge the potential safety of a home visit.
- If the employee and their Line Manager judge a home visit to be safe, and the employee is happy to proceed, the following steps must be taken.
- The member/their family or carer must be told that a home visit can take place in advance and given the opportunity to object. If the member objects the home visit must not take place. Other arrangements must be made.

Procedure for home visits/lone working:

- The worker carrying out the unaccompanied home visit or lone working must gather the following information and share it with their line manager via the shared calendar (risk assessing as necessary):
 - name of member/family member
 - name of employee carrying out the visit
 - time and expected duration of visit/lone work
 - employee and Line Manager's mobile numbers exchanged in advance
 - contact details for members and their families can be found on SharePoint, where it is a new referral the address and contact details should be shared.
- Staff members will log in and out of any lone working session with their line manager.
- The line manager will be responsible for contacting the employee at the appointed time should they not check in (within 30 mins of expected finish time). This can be done by messaging initially with a follow up telephone call, if necessary.
- If no contact can be made within an hour of the expected completion time, the line manager (or agreed alternative) will attempt to make contact with the



member/family directly, and if no satisfactory response (verbal communication with the employee) is forthcoming will contact the police with full details of the home visiting/lone working.

- The employee making the visit must ensure that they carry with them, and show the member/family, their Yellow Submarine identification as necessary.
- If the member appears at all uncomfortable about the visit continuing the worker should arrange to contact them the following day by telephone and leave.

Policy Reviewed by: Kate Sankey
Date Reviewed: 4th February 2025
Next Review: February 2026



Manual Handling Policy v1.4

Yellow Submarine places the safety of employees, volunteers and members as an utmost priority. Manual handling is not a regular occurrence at Yellow Submarine but can occasionally be expected. Manual handling operations means any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving thereof) by hand or bodily force (Manual Handling Operations Regulations 1992). There is a legal requirement for the organisation to have a Health and Safety policy that includes a manual handling statement.

Manual handling causes a known risk of Musculo-skeletal injury. This policy has been adapted to provide clarity and consistency of manual handling guidelines within the organisation. The organisation will comply with the requirements of the law as stated in:

- The Health and Safety at Work Act 1974
- The Manual Handling Operations Regulations 1992
- All other legislations, or parts thereof, relating to manual handling and provision and maintenance of equipment
- This policy.

Yellow Submarine aims to reduce the risk to employees, volunteers and members of Musculo-skeletal injury to the lowest level possible. The assessment and reduction of risks from manual handling aims to achieve:

- A safe working environment
- Suitable and sufficient equipment to reduce manual handling risk
- Well trained employees who take care of their own health and safety and that of others.

Manual Handling Risk Management System.

Consider what it is that needs moving this should never include people, except in an emergency!

Measurement of health

Yellow Submarine will take the following factors which may affect an employee, volunteer or member's capabilities into consideration:

General Physical Capability

A risk of injury will be considered unacceptable if a specific manual handling technique cannot be carried out by most reasonably fit, healthy employees. An employee can decide whether or not they can manage the tasks to be performed and should make their judgement known to their Line Manager. However, the Health and Safety Lead has a



duty to make reasonable checks to establish if the employee, volunteer or member is physically capable of completing the task without injury.

People with health problems

Conditions such as recent injury, hernia, back problems, heart conditions or other risk increasing factors should be taken into consideration before an employee is asked to do manual handling work. If there is any uncertainty, medical advice should be sought. The Equality Act 2010 may require Yellow Submarine to make reasonable adjustments.

New and expectant mothers

Health and Safety Law requires employers to make allowances for pregnant women and those at high risk after childbirth, for about six months, to prevent injury from the physical work involved in manual handling procedures. A risk assessment must be carried out on the expectant mother and reviewed monthly as long as the expectant mother continues to work.

Young workers

Extra care is required to ensure that young people, up to the age of 18, are not exposed to the risks associated with manual handling. Extra precautions or close supervision is needed. Accidents and incidents occurring at work that result in musculo-skeletal injury will be thoroughly analysed.

Managing Risk

Yellow Submarine will reduce, as far as is reasonably practicable, the need for its employees to carry out any manual handling tasks that involve a risk of injury. The risk to employees will be assessed and documented where manual handling operations cannot be avoided. The risk assessment will consider:

- Task
- Load
- Individual capacity
- Environment
- Any other relevant factor.

The risk assessment will document any remedial action necessary to reduce the risk to the lowest possible level and will say when this should be organised and implemented by. The risk assessment will be reviewed annually or sooner if any significant changes have occurred to ensure effective control and monitoring of the risk. If a risk assessment highlights an unacceptable level of risk, the manual handling will not take place.

Yellow Submarine's Health and Safety Lead is responsible for ensuring that there are suitable and sufficient assessments of manual handling tasks within the organisation which are regularly reviewed. The Health and Safety Lead will ensure a competent



person/people carry out risk assessments. The Health and Safety Lead will undertake training in safe systems of work and monitor for good practice. A safe working environment will be provided that allows manual handling procedures to be carried out with minimal risks to employees as it is reasonably practicable.

Yellow Submarine will ensure all employees receive information and training in manual handling as needed. The purpose of this is to:

- Inform employees of legislations, policies and procedures they must follow to reduce the risk of injury.
- Inform employees of their responsibility to look after their health and safety and that of those who may be affected by their actions.
- Provide practical advice and training on best practise in manual handling.
- The employee's line-manager is responsible for ensuring all employees attend training sessions.

In case of an incident, manual handling accidents or incidents are fully investigated and followed up as necessary. Incidents will be reported to the employee's line manager as well as the Health and Safety Lead. An incident report should be filled out and filed within 24 hours of the incident; if appropriate this should also be reported to RIDDOR as per their requirements.

Employees must:

- Be aware of their responsibilities under the Health and Safety at Work Act 1974 and the Manual Handling Operations Regulations 1992.
- Where relevant, attend manual handling training sessions provided by the organisation.
- Seek assistance and extra training if their level of knowledge is insufficient for a new situation.
- Be aware of their individual capability for manual handling and not exceed it.

Further information about safe moving and handling and the management of risk can be found on the HSE website [here](#).

Policy Reviewed by: Kate Sankey
Date Reviewed: 4th February 2025
Next Review: February 2026



Medication Handling policy v1.7

Yellow Submarine is committed to the safety and health of employees, volunteers and members alike. This policy and procedure discusses the administration, storage, and disposal of medication, and therefore forms an important part of the risk and medicine management strategy.

Administration: Yellow Submarine will not give medication to members without the consent of the individual receiving the medication (and the family/carer of the individual if it is necessary). Individuals taking medication must consent to treatment, and have the right to refuse. When consent is not possible to obtain, no steps must be taken without permission from an individuals' family/carer. This consent and/or refusal should be recorded. Refusal should be recorded on an incident report and reported to the person's carer and/or GP. The continuing consent should be reviewed, re-confirmed, agreed and recorded yearly or when a prescription changes (whichever is sooner).

Medication will not be given covertly (hidden in food for example) unless clearly agreed and recorded within a risk assessment/care plan. Please see attached form for medication consent for those under 18 years of age. Employees will have access to members' medication details at each site where medication is given. This can be found in the session/holiday information binder, details should also be uploaded to Yellow Submarine's cloud computing system.

Individuals should only be supported to take their medication by employees or a support worker who are trained to do so. When working with members, this will be done by an employee or volunteer trained by the Community Children's Nursing Team, in accordance with Delegated Healthcare Tasks. Employees will not undertake procedures that they feel they are not competent in / have not received training in. Additional training should be sought, as necessary.

When handling medication individuals will give their sole attention to this task. The aim of those supporting individuals should be to promote and maintain self-medication wherever possible. Medication (or withdrawal of) will not be used as a punishment, threat, or to 'control' behaviour. When medication has been prescribed by a healthcare professional to assist in the management of behaviour this must be clearly agreed and guidelines for administration should be recorded within a risk assessment and individual care plan.

Safety: Medication must be handled in a safe manner, to ensure cross contamination and infection does not take place. Hands should be washed and gloves worn, where appropriate. Employees should be aware of the manufacturers' recommendations regarding the safe handling of medication. Employees must also be aware of some of the potential problems that can occur if medication is not handled correctly and the legal aspects of handling medication.



Medication:

- Must be provided in a clean, clearly labelled container, with a prescription label attached showing the member's name, the name of the medication, date of birth and the correct dosage. If information given on booking sheets does not match the label on the medication, this should be clarified with the individual's GP and/or parents/carers. If medication is not handed over to the employee in a satisfactory condition (in date, clearly labelled, with all relevant information) the member should not be accepted onto the activity until this is rectified.
- Staff should be made aware if the medication is 'controlled' as this will need to be kept securely at all times. Parents/carers are asked to specify whether the medication is controlled on the medication assessment form.
- Over-the-counter medication should equally be handed to employees in a secure manner, with clear guidelines on when it should be taken.
- May only be administered to the person they were prescribed, labelled and supplied for, so medicines cannot be shared as though they are 'stock' supply for the service.
- Must be given according to the instructions of the prescriber (that is, employees cannot alter the dose without referring first to the prescriber).
- Should be checked in and out when the member arrives for an activity/holiday and when they return home or are collected. This is to ensure the member has an adequate supply of medication for the duration of the activity and to ensure that activity leader and the member and/or the parent/carer are agreed on the stock of medication now with Yellow Submarine. This is especially important to managing controlled medication; with controlled medication any discrepancies should be reported without delay.
- May need to be disposed of because of spillage. Employees will fill out a disposal form should they need to dispose of any medication. It is an employee's responsibility to inform their line manager, and if appropriate also the member's family/carer/GP, when additional medication is needed (either due to spillage or insufficient amount). Any medications should be returned to carers or members at the end of each session/activity.
- Should be provided to include spare medication, in case of spillage, spoilage or loss during a residential trip. Carers and employees must communicate about extra stock (this should not be excessive) to ensure its safe return.

Storage: Medication will be locked away while kept with Yellow Submarine, unless an adult member is capable of self-medicating and wishes to keep it with them in their possession. If this could pose a risk to another member (e.g., they may take it), the Activity Leader will need to find a secure and mutually agreeable place to store the medication so that it cannot be accessed by anyone else. Any controlled medication should always be stored securely.



Emergency medication should always be accessible to the member for whom it is prescribed and staff. If the member is able, then it can be kept on their person e.g. inhalers, otherwise it should be kept by the activity leader who will ensure it is safe but accessible, if needed.

One of the safest ways of ensuring good medication management is to involve the person taking the medication in the process. Individuals may not be able to self-medicate but if they can recognise their tablets (even if only the colour and number), know what time to take them (e.g., mealtimes, before bed) and be encouraged to prompt employees, this will reduce the risk of errors.

Adverse reaction or administration error: If anything related to the giving of medication does not go according to the expected plan (for example the wrong medicine, or wrong dose is given to a member), then this must be reported to the activity leader and their line manager/senior management team immediately.

The Activity Leader should contact the member's carer and GP for further information. Similarly, should an employee be concerned that a member has had an adverse reaction to their medication, their carer or GP should be contacted without delay. Should the person have serious reaction that could be life threatening, the employee should call 999. An incident report should always be filled out as soon as possible, but certainly within 24 hours of the incident.

Policy Reviewed by: Kate Sankey
Date Reviewed: 13th February 2025
Next Review: February 2026



Medication Forms – for sessions and assessment forms (Appendix I)

Yellow Submarine Medication Form 2024/25

If you wish Yellow Submarine to administer medication to your young person during the course of the activity s/he will be attending (including 'rescue' medication such as antihistamines, asthma inhalers etc as well as non-emergency or over-the-counter medication), please complete this form and hand it to the activity leader at the start of the activity.

Medication should be handed to staff - clearly labelled with the name of the medication, in date, and with the young person's name on the box. It must also clearly state the dose and times to be given, which should correspond with the information provided below. Yellow Submarine staff will follow the instructions on the box, according to their training, unless instructed otherwise in writing.

Young Person's name	
Date of Birth	
Parent/Carer's name	
Emergency contact phone number	
Young Person's Doctor's name	
Young Person's Doctor's address	
Young Person's Doctor's phone number	

Medication name	What is it for?	Dosage, and time (or PNR/as needed)	Possible side effects	Administered (Please initial; noting time(s))	Returned (Please tick)



(If there is insufficient room, please attach a separate sheet)

I give my permission for Yellow Submarine staff to administer medication to my young person according to the instructions given above. If it is not possible to administer the medication in this way, I understand Yellow Submarine staff will contact me (or a health professional, in the event that I cannot be contacted) to ensure the health and well-being of my young person.

Signed _____ (parent/carer) Date _____

Medication Accepted by (Activity Leader) _____ Date _____



Name: _____

DOB: _____

Please give us as full description of all the medication that your young person is taking, as in the unlikely event of a medical emergency health professionals would need this information:

Name	Dosage	Time of administration	Method of administration	Any side effects?	Do you take this regularly or only when it is required?	Is this a controlled drug? [Y/N]	Will this need to be administered at a YS session?

Should any of the above details change please do let us know as soon as possible. If medication needs to be administered during a Yellow Submarine session we will ask you to complete a further form outlining the protocol and giving your consent for Yellow Submarine staff to administer the specified medication.

I confirm that all of the above information is correct to the best of my knowledge and I understand that this data will be stored under the Data Protection Act 2018. The information may be shared between relevant staff and authorities to ensure that my young person can be appropriately supported otherwise it will be treated confidentially.

Signed _____ (parent/carer) Date _____



Name: _____

Date: _____

Holiday attending: _____

Support needed during medication administration: [pick one]

Prompting required [you can look after own medication] ☐

Prompting required [staff will need to look after your medication] ☐

Full support [staff will need to look after and administer your medication] ☐

Please give us as full a description of all the medication that you are on:

Name	Dosage	Time of administration	Method of administration	Any side effects?	Do you take this regularly or only when it is required?	Is this a controlled drug? [Y/N]

Is there any other info related to any of the above medicine, its administration, its storage etc. that it would be useful for us to know? For use during the holiday only:

Signed to YS	Y-Sub	Member	Date:		Counted	Y / N
Signed to parent/carer	Y-Sub	Member	Date:		Counted	Y / N

Yellow Submarine advises that you do not bring an excessive amount of medication with you in relation to the length of your trip. Also Yellow Submarine will not carry out any invasive procedures e.g. administering eye drops, unless this has been risk assessed and a member of staff with the appropriate training can be put in place.



Name: _____

Date: _____

Role: _____

Support needed during medication administration: [pick one]

- I do not require any support and can look after my own medication without support
- Prompting required [you can look after own medication]
- Prompting required [staff will need to look after your medication]
- Full support [staff will need to look after and administer your medication]

☐
☐
☐
☐

Please give us as full a description of all the medication that you are on:

Name	Dosage	Time of administration	Method of administration	Any side effects?	Do you take this regularly or only when it is required?	Is this a controlled drug? [Y/N]

Signed by		YS Member	Date:	
Signed by		Parent Carer	Date:	
Signed by		YS Staff	Date:	

Yellow Submarine advises that you do not bring an excessive amount of medication with you in relation to the length of your shift. Also Yellow Submarine will not carry out any invasive procedures e.g. administering eye drops, unless this has been risk assessed and a member of staff with the appropriate training can be put in place.

Support with 'over the counter' medications e.g. paracetamol will only be given in agreement with parents/carers.



Medication Disposal Form (Appendix II)

Member	Medication/Dose	Amount Disposed	Method of Disposal	Reason for Disposal	Disposed by (Signature)	Witnessed by (Signature)	Date Disposed



Photography, Filming and Mobile Phone Policy v1.6

Photography & Filming: At Yellow Submarine, photography is hugely important to record the successes and achievements of members in their endeavours. However, it is important to remember that photography can be used and distributed inappropriately, particularly online. Every member in Yellow Submarine's care deserves to be protected from the misuse of photographic and video images of themselves, taken whilst supported by Yellow Submarine.

The policy applies to any photographic and filming equipment including smartphones, tablets, digital or video cameras.

Photographs taken or filming recorded during Yellow Submarine activities as part of a normal day are only taken by employees or approved volunteers (agreed by the Activity Leader and/or Line Manager in advance). Employees and volunteers will, as far as possible, only use Yellow Submarine equipment to take photos and videos, as long as they have the consent of individual members to do this and it is welcomed. These images and videos will be deleted as soon as they are uploaded to the organisation's secure server. Unauthorised employees and volunteers are not permitted to take photographs or videos at all. Failure to adhere to this policy may result in disciplinary action.

Permission is needed for any and all photography or recording, and this permission can be withdrawn at any time without prejudice. Yellow Submarine must have the consent of parents or carers of any young person under the age of 18.

It is therefore important that employees and volunteers:

- explain to parents, members and carers (if relevant) why caution is necessary
- are aware of the intended use of photos and/or videos e.g. parent or carer's own record, media & publicity, etc.
- are aware of the content required when using a professional photographer
- inform parents and guardians (if relevant) and seek their consent for any publication or media use
- publish only limited details alongside their photos in newspapers, etc.
- take photographs or videos openly and away from changing and toilet areas
- consider the suitability of clothing worn during sessions e.g. swimsuits

Mobile phones & usage: Whilst it is expected that all staff and volunteers will have a mobile phone with them whilst at Yellow Submarine, the use of mobile phones by employees (other than the activity leader or senior management team, who should, as far as possible, have their phone on them at all times) or volunteers during activities is generally discouraged, except under the following circumstances:

- To address any concerns e.g. Safeguarding or First Aid needs.
- Where express permission has been agreed with the activity leader for a specific purpose and it is imperative for the activity leader to be able to contact the staff member or volunteer e.g. when splitting into groups during a trip to a theme park.
- During breaks e.g. volunteers given free time during residential holidays.



Delivery staff are issued with a work mobile phone for safety and to make work related phone calls or text messages. The phone should remain on during working hours including home visits, or sessions held off site. Staff must be easily contactable in case of emergency. This phone remains the property of Yellow Submarine and should not be used for personal use except in the case of an emergency.

These phone numbers can be circulated to parents; carers; professionals and members but the appropriateness of sharing numbers with under 18 members must be considered.

Employees who are issued with a mobile phone are responsible for the security of the phone and should take all reasonable steps to ensure its safekeeping. Reasonable care must be taken for the security of the phone and storage of contact numbers; a password/PIN facility must be used. This PIN is to be shared with Safeguarding Lead, Kate Sankey. The content of mobile phone handsets is open to scrutiny by the management team at any time.

When out of the office, the mobile should be kept with the employee and not left unattended in a vehicle, or elsewhere, at any time.

You must not use the mobile phone to access, use or distribute any material, or to participate in any activity, which might be regarded as distasteful, offensive, indecent or harmful to other users. The following list gives examples of the sort of material or activities that will be regarded as unacceptable. It is not exhaustive.

- Bullying or harassment
- Personal insults, attacks or abuse
- Racist or sexist activity
- Chain letters or games
- Pornography

Yellow Submarine receives individually itemised mobile phone bills on a monthly basis. Each bill shows the user's number and includes the line rental and the date, duration, telephone number and cost of all calls made.

If a mobile phone belonging to Yellow Submarine is lost or stolen, the management team must be notified immediately so that the phone can be barred or disconnected. Upon leaving Yellow Submarine any mobile phones plus associated equipment (e.g. earphones, chargers etc.) issued by us must be returned to the Charity.

Employees should ensure that they do not answer mobile phone calls whilst driving. Yellow Submarine will not be liable for such use and any employee who is fined for breaching the ban will be required to pay such fines themselves and may face disciplinary action.

Employees should be aware that other people may overhear conversations made on mobile phones and take steps to ensure they do not inadvertently breach any of our rules on confidentiality.

Members and mobile phones – Yellow Submarine recognises that mobile phones are a part of everyday life and many members will have personal phones that they will bring to sessions. For some members they may form an important part of keeping them safe, for example if they travel independently to sessions.



At sessions staff will encourage members to keep mobile phone usage to a minimum, recognising that they may form an important role in social interactions. Staff will monitor interactions where possible and in accordance with Yellow Submarine's E-Safety policy will encourage members to be safe when using their phones and will report any concerns. Yellow Submarine will take no responsibility for the safety of personal mobile phones.

When going offsite to complete work-related tasks Yellow Submarine trainees will have access to a Yellow Submarine mobile phone, so that they are contactable when out. This mobile phone will be programmed with Yellow Submarine's office telephone numbers and trainees should be clear that the phone should only be used for work purposes only unless in the case of an emergency. The phone should be returned to the office when the trainee returns to site. For example, when going out shopping trainees may need to call the office.

Policy Reviewed by: Kate Sankey
Date Reviewed: 13th February 2025
Next Review: February 2026



Physical Intervention Policy v2.1

The term '*physical intervention*' refers to any method of responding to challenging or concerning behaviour which involves some degree of reasonable force, active or passive, to limit personal choice over free movement.

There are three broad categories of physical intervention:

- **Direct physical contact** between the carer and person with challenging behaviour (e.g. holding down of arms).
- The **use of barriers** to limit freedom of movement (e.g. locked doors).
- The **use of materials or equipment** to restrict or prevent movement (e.g. the use of arm splints).

The need for physical intervention stems from the fact that someone has begun to display concerning behaviour that is, or could cause harm to themselves or someone else. However, it is worth noting that violence and aggression are not generally presenting behaviours that just happen; there is normally a 'trigger' in the form of a perceived threat, humiliation, anxiety, injustice or frustration that has lowered someone's safety and self-esteem and the resultant behaviour presents as a means of communicating the distress, or restoring the balance.

Yellow Submarine's service user group is made up of young people and adults who have a learning disability, ASC, and some emotional/behavioural difficulties. Generally, our members have mild to moderate learning disabilities, and their needs are manageable on a group basis. In some instances members may require 1:1 support. This includes those for whom physical intervention to manage their behaviour/safety is part of their overall care plan or behaviour management plan.

Yellow Submarine operates a "hands off" policy, where members are not physically restrained, moved, lifted, pulled, held still, pushed or otherwise. However, to reduce to an absolute minimum the use of restrictive practices, and to ensure the safety and wellbeing of both our staff and all who access our services, Yellow Submarine provides training in Positive Approaches to Behaviours that Challenge, and Safe Practices in Physical Interventions. These interventions are to be employed only as a last resort, as part of a planned and agreed behaviour support plan, and never by staff or volunteers who are untrained in Safe Practices in Physical Intervention.

However, it is possible that, in extreme circumstances, a person who uses our services may become agitated, upset, unsettled or otherwise out of control in their behaviour. Although all efforts to predict and prevent challenging physical behaviour are made before a member accesses services, there is always a small risk that unanticipated challenging behaviour may be displayed. It is therefore acceptable for a Yellow Submarine employee or volunteer to make physical contact (in a manner designed to control that member's behaviour and overrule their free choice of movement) only in circumstances where:

A member or employee's physical safety is in imminent and significant danger

This may include:

- Having an epileptic seizure or falling ill in a dangerous place, i.e. the road.
- Something is about to fall on them or hit them, and therefore harm them.
- They are harming themselves or placing themselves in harm's way.



- They are threatening to cause (or are already causing) someone else harm and the employee is certain that they are serious and capable of doing so (it is usually the easiest and safest option to move the potential victim away from the aggressor, rather than try to physically stop the aggressor).

It must be the honestly held belief of the employee or volunteer that the member will come to harm, or cause harm to themselves or another, in order to justify making physical contact with them; in this case, physical interventions must be reasonable given the circumstances, proportionate to the level of risk of harm, and the least restrictive response necessary to reduce harm to all. They must also have tried every other method possible to de-escalate challenging behaviour which might be appropriate in the circumstances.

Policy Written by: Adam Burgess
Policy Reviewed by: Kate Sankey
Date Reviewed: 13th February 2025
Policy Review Date: February 2026



Professional Boundaries Policy v1.8

Purpose and Scope

This policy outlines Yellow Submarine's policy relating to employee contact with members, and exists to safeguard the interests of members, volunteers and employees. Where a volunteer is vulnerable they should also be considered, for the purpose of this policy, a member. If there is any doubt over the vulnerability of a volunteer, it is the employee's responsibility to discuss this further with their line manager.

All employees and volunteers have a responsibility to maintain professional boundaries with members, and this is discussed in detail in induction training and supervision time. Line managers are responsible for monitoring professional practice, and challenging employees where standards are not being upheld, including taking disciplinary action if appropriate.

Where professional boundaries have not been maintained according to this policy, they should be addressed as soon as possible.

Policy Guidelines

Relationships and contact within work: Employees and volunteers alike should be approachable, open to fair challenge and criticism; they should not be seen as intimidating or inaccessible. Employees and volunteers should understand the difference between befriending (a professional relationship made to meet the members' needs) and becoming a friend (a non-professional relationship which meets the needs of both people). The relationship between an employee and a member is not an equal one.

On no account should an employee or a volunteer enter into a sexual relationship with a member or a vulnerable volunteer.

Where employees and volunteers know members personally, prior to them accessing Yellow Submarine's services, this must be made known to their line manager. Employees and volunteers should treat members with dignity, respect and in a non-judgemental manner. Employees and volunteers should never apply favouritism to any members.

Employees and volunteers should respect the members' right to privacy and not discuss one member's personal information to another member. Employees and volunteers should never enter into gossip or hearsay with members. Please see Yellow Submarine's Confidentiality Policy for further policy guidance.

Employees and volunteers should be careful not to influence members with their own beliefs or personal values. Employees and volunteers should be aware of their own potential to influence vulnerable members and not promote their own religious or political beliefs upon members.

When employees and volunteers offer advice to members, they should provide them with sufficient information to make informed choices. Employees should also be aware of where they do not have knowledge/ experience to give advice and refer the members to appropriate agency or employee within the organisation.

Employees and volunteers should be aware of the need to empower members and therefore not "do everything for them" but encourage and enable them to achieve outcomes themselves.



Employees should be realistic and honest about the services they provide to members and not give them false hope or make false promises.

Bullying and Harassment: Yellow Submarine does not tolerate bullying or harassment of any kind against employees, volunteers or members. Should anyone feel they have been bullied or harassed, they can report this to their line manager, safeguarding lead, or deputy safeguarding lead (information can be found in the Safeguarding Policy). Any information reported to management will be regarded with the utmost importance and confidentiality. Should a formal complaint be made, it will also be investigated. This policy should be used in conjunction with the Equality and Diversity Policy as well as the Safeguarding Policy.

Bullying may be characterised as: offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate, or injure the recipient.

Harassment as defined in the Equality Act 2010 is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Examples of unacceptable behaviour include:

- spreading malicious rumours, or insulting someone by word or behaviour
- ridiculing or demeaning someone – picking on them or setting them up to fail
- exclusion or victimisation
- unfair treatment
- overbearing supervision or other misuse of power or position
- unwelcome sexual advances – touching, standing too close, display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected
- making threats or comments about job security without foundation
- deliberately undermining a competent worker by overloading and constant criticism
- preventing individuals progressing by intentionally blocking promotion or training opportunities.

Bullying and harassment is not necessarily face to face, it may occur through written communications, visual images (for example pictures of a sexual nature or embarrassing photographs of colleagues), email, phone, and automatic supervision methods – such as computer recording of downtime from work or recording of telephone conversations – if these are not universally applied to all workers.

Additional information for employees regarding their rights against bullying and harassment from ACAS can be found [here](#).

ACAS Guidance for employers can be found [here](#).

Contact Outside of the Workplace: Employees and volunteers should never give out their personal contact details to members, nor should they allow members to visit their homes. Employees and volunteers must not encourage members to develop relationships with the employee or volunteer's relatives or friends. Employees and volunteers who encounter members in a social situation outside of Yellow Submarine should be pleasant and polite if approached by the members but should not encourage any prolonged social contact.



Physical Contact: Where possible physical touching between employees/volunteers and members is to be discouraged and avoided. Members may misinterpret physical contact as affection outside of the professional relationship. Members may see physical contact as an expression of favouritism e.g. where an employee hugs one member and not another.

All employees and volunteers should be aware of the risks of physical contact with a member, that it may be misunderstood and may lead to an employee or volunteer being vulnerable to allegation of inappropriate professional behaviour or worse. In particular, when providing emotional support in distressed situations, when a member opens up to discuss sensitive matters, sometimes a pat on the forearm of the distressed member may be appropriate. A hug however can also be acceptable, in times of distress or celebration, if there are other employees present and if it is brief. With any form of physical contact staff should be aware of their surroundings and the context.

Financial: Employees and volunteers should not enter into any financial transactions with members, including buying, selling, exchanging or bartering goods and services. This also includes members entering into financial transactions with the relatives or friends of employees and volunteers.

Clear records should be kept of all handling of finances on behalf of the members.

Employees and volunteers should not lend or give their personal money or possessions to members or vulnerable volunteers; any money lent to members has to come from the organisation's petty cash/ allocated fund and should be signed for.

Employees and volunteers should not borrow money or possessions from members or vulnerable volunteers.

Use of Cars: Employees and volunteers should not give members lifts on a 1:1 basis in their cars unless it has been risk assessed and express permission given by their line manager, for members aged under 18 parental permission must be gained. Lone working in this situation should be avoided unless express permission has been given by the line manager. Where it has been defined as acceptable by the organisation for members to be given lifts by employees or volunteers, e.g. so that the employee can attend a meeting with and on behalf of the member, the appropriate car insurance must be obtained.

Managing Boundary Issues: Employees and volunteers may unwittingly be put in a position where their relationship with members is compromised or be drawn into conversations or situations where their boundaries are being stretched or crossed. In some situations, the fine line between good and bad practice may not always be obvious.

Employees and volunteers should seek the guidance of their line manager if they are unsure about the nature of a relationship developing with a member or vulnerable volunteer, or if they need advice on how they intend to deal with a situation. Similarly senior management team requires advice; they must consult with the trustees.

A written record of a broken or blurred boundary must be kept in the appropriate file or document, to ensure openness and consistency. Boundary issues should be discussed with the line manager and during team meetings on a regular basis, and on occasions specific team training or facilitated discussion may be appropriate.



There are some events and arrangements planned with members that are highly valued by them but may present potential boundary issues. In these instances there may be times a need to exercise flexibility and discretion in the interpretation of this policy. Such instances where there are clear potential benefits to members should be brought to the attention of the employee's line manager. The situation will then be 'risk assessed', and a record of any necessary safeguards agreed by the line manager must be kept.

Policy Reviewed by: Kate Sankey
Date Reviewed: 11th February 2025
Next Review: February 2026



Yellow Submarine Remuneration Policy v1.1

Reward Philosophy

The following beliefs and values underpin our approach to remuneration:

1. We believe individuals are committed to the mission of Yellow Submarine and are not motivated by pay alone.
2. We aim to pay staff more than the living wage.
3. We believe in treating people fairly and equitably.
4. We understand the need for salaries to be competitive.
5. We want staff to be fairly paid in relation to the relative size of their job (internal equity)
6. We will aim to recognize what people bring to the organization and provide space to grow.
7. Recruiting and retaining people with values in line with those of Yellow Submarine is more important than the skills they have or can develop whilst in role.
8. We value quality of care and support.
9. We know pay decisions must be balanced with what we can afford to pay.

Basic Principles

- Employee remuneration will comprise salary and pension contributions only. Yellow Submarine does not generally offer bonuses or benefits in kind.
- Yellow Submarine will support individuals' personal and professional development as appropriate and affordable to further the mission.
- Individuals will receive and have the opportunity to discuss feedback with their manager.
- Pay will be reviewed at least annually and individuals will have the right to know how decisions about their pay are made.
- Anyone subject to a performance improvement plan will not receive any salary enhancement.

Remuneration Policy

The policy underpins Yellow Submarine's reward system and how we manage reward decisions.

1. The salary for each job will be determined according to the following order of priority:
 - Step 1 – Relative job size/weight vis-à-vis other jobs in the organisation
 - Step 2 – Comparative market position in the third sector/relevant enterprise sector, local geographic area and public sector.
 - Step 3 – Affordability - cost and value for money will be used as a final decision-making lens.

This means:

- When a job is advertised, the salary on offer will be reflective of its job size.
 - If a job changes in size to reflect the skills and competence of a staff member and needs of Yellow Submarine then the salary may be adjusted accordingly
2. Salaries will be agreed on entry. Single spot salaries within a range will apply reflecting the job to be done (job size) and pay market position.



This means:

- Staff may be paid differently within a predefined pay range for like-jobs in the organisation.
3. Pay will at least be reflective of median market values of like-posts in the voluntary/not-for-profit sector and retail/hospitality sector for café roles.
 4. Changes to salaries might be triggered by:
 - a. Change in level of job responsibilities
 - b. Material changes to costs of living
 - c. Market assessment
 - d. Availability of funding

This means:

- Someone who brings or develops additional skills and expertise might be given more or different job responsibilities which might result in salary adjustment
 - Salary enhancement will not be automatic
 - Salary enhancement will not be driven by length of service
 - Cost of living changes (whether up or down) will not automatically drive a change in salary
 - Any change in pay will be considered against what is affordable.
5. The scale and range of employee benefits will be equitably applied

Agreed by the Trustees on 8th April 2018

Review date: Reviewed by the remuneration committee alongside remuneration discussions annually.



Safeguarding Young People Policy (Full Version) v2

Key Information

Safeguarding Key Information	
Designated Safeguarding Lead	Kate Sankey, Co-Director
Deputy Safeguarding Lead	Toby Staveley, Chair of Trustees / Anna Cheetham Co-Director
MASH (Multi Agency Safeguarding Hub) - 0345 050 7666	
Reporting concerns (Young People)	https://www.oscb.org.uk/concerned-about-a-child/
Reporting concerns (Adults)	https://www.osab.co.uk/how-to-report-concerns/

Policy review dates

Review Date	Changes made	By whom	Date Shared
January 2014	Updating to cross reference other policies	Caroline Weston, Deputy Manager	01/02/2014
January 2015	Updating contact details & relevant document links	Kate Sankey, Interim Head of Finance & Compliance	January 2015
March 2016	Updating contact details, relevant document links and definitions including radicalisation.	Kate Sankey, Head of Finance & Compliance	March 2016
May 2017	Updating contact details, relevant document links; including details of relevant changes in procedure in Oxfordshire	Kate Sankey, Co-Director	May 2017
July 2018	Updating contact details; relevant document links, including definitions of harm in accordance with new guidance.	Kate Sankey, Co-Director	August 2018
November 2019	Updating contact details, relevant document links	Kate Sankey, Co-Director	November 2019
March 2021	Updating contact details, relevant document links	Kate Sankey, Co-Director	June 2021
July 2022	Updating contact details, relevant document links	Kate Sankey, Co-Director	August 2022
February 2024	Updating contact details, relevant document links	Kate Sankey, Co-Director	February 2024
March 2025	Updating contact details, relevant document links	Kate Sankey, Co-Director	June 2025; team meeting.



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Introduction

Everyone working in or for Yellow Submarine shares an objective to help keep young people safe by contributing to:

- providing a safe environment for young people to learn and develop in all our settings and
- identifying young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in all our young people's settings.

Two principles underpin this objective, as outlined in "Working Together to Safeguard Children" (first published in 2015; updated 2023)

- safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part; and
- a child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children.

Yellow Submarine's Commitment to Safeguarding

Yellow Submarine is committed to safeguarding and promoting the welfare of all its young people. Each young person's welfare is of paramount importance. We recognise that some young people may be especially vulnerable to abuse. We recognise that young people who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at Yellow Submarine, their behaviour may be challenging. We recognise that some young people who have experienced abuse may harm others. We will always take a considered and sensitive approach in order that we can support all of our young people.





1. Providing a safe and supportive environment

A. Safer Recruitment and Selection

Yellow Submarine pays full regard to current government guidance 'Working Together to Safeguard Children 2023' (available [here](#)), as well as [Safer Recruitment Guidance](#) issued by the department of Education and when supporting adult members protocols issued by Oxfordshire Safeguarding Adults Board - [here](#).

We ensure that all appropriate measures are applied in relation to everyone who works for the charity who is likely to be perceived by the young people as a safe and trustworthy adult including e.g. volunteers. Staff with HR responsibilities will be encouraged to undertake Safer Recruitment training, for example, the NSPCC's course on [Safer Recruitment](#). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and, where appropriate, undertaking DBS checks.

In line with statutory changes, underpinned by regulations, the following will apply:

- DBS Enhanced Disclosure protocol is followed for all new appointments to our workforce.
- Yellow Submarine is committed to keep an up-to-date single central record detailing a range of checks carried out on our staff and volunteers.
- All new appointments to our workforce who have lived outside the UK will be subject to additional checks, as appropriate.
- Yellow Submarine ensures that staff and volunteers have undergone the necessary checks and will be made aware of this policy.
- Identity checks must be carried out on all appointments to our workforce before the appointment is made.

B. Safe Practice

Yellow Submarine complies with the current Safe Practice guidance to be found in Oxfordshire Safeguarding Procedures – up to date guidance for professionals can be found on the OSCP [website](#).

Safe working practice ensures that young people are safe and that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- work in an open and transparent way.
- work in partnership with other colleagues, professionals and organisations, wherever relevant.
- discuss and/or take advice from senior managers/DSL over any incident which may give rise to concern.
- record any incidents or decisions made.
- apply the same professional standards regardless of any irrelevant personal characteristic or status of an individual (as defined by the Equality Act 2010).
- are aware of Yellow Submarine's confidentiality policy.



- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

C. Safeguarding Information for Young People

Yellow Submarine works hard to ensure that all young people who attend Yellow Submarine are aware that they can talk to any member of staff if they have a problem or concern. Yellow Submarine is committed to ensuring that young people are aware of when behaviour towards them that is not acceptable and how they can keep themselves safe. Information that is suitably accessible for young people with learning disabilities is made available to them in as many formats as possible, including verbal information.

All young people are made aware of the leader on each activity, so that they are aware of who has overall responsibility for keeping them and the group safe. We inform young people of whom they might talk to, their right to be listened to and heard (both with and away from Yellow Submarine), and what steps can be taken to protect them from harm. Youth work principles of Empowerment, Equality of Opportunity, Participation and Education are used to structure our planning, design, delivery and evaluation of our work, to promote an equal and inclusive environment.

Young people are made aware that information can be found at organisations such as Childline and the NSPCC, through using posters and conversation.

Yellow Submarine spends a significant amount of time talking with young people in an informal setting. The charity uses a variety of methods to gather information, record opinions, and generally communicate that staff and volunteers are interested in what the young people feel and think about. Managers are involved in the day to day running of activities, and therefore communicate that no member of staff in the organisation is "off limits" i.e. unaccountable.

D. Partnership with Parents, Families & Carers

Yellow Submarine shares a purpose with parents, families and carers to keep young people safe from harm and to have their welfare promoted.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a young person.

Yellow Submarine will share with parents any concerns we may have about their young person unless to do so may place a young person at risk of harm.

We make parents aware of our policies and procedure through our website and mail-outs, and parents are made aware that they can view this policy on request. Our full policy pack is available to download from our [website](http://www.yellowsubmarine.org.uk).

E. Partnerships with others

Yellow Submarine recognises that it is essential to establish positive and effective working



relationships with other agencies who are partners in the Oxfordshire Safeguarding Children Partnership. We work in close partnership with the Local Authority, Social Services, local schools, the LCSS, Children & Family Centres and other Short Breaks providers. There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all young people.

Yellow Submarine follows current government about information sharing which can be found [here](#). Further guidance and tools can be found on the OSCP website.

F. Yellow Submarine Training and Staff Induction

Yellow Submarine's senior member of staff with designated responsibility for Safeguarding undertakes Designated Lead training (provided by the Oxfordshire Safeguarding Children Partnership) and refresher training at two yearly intervals. All other members of the senior management team undertake Designated Lead/Specialist training at two yearly intervals. As a small team it is essential that all senior managers can deputise these responsibilities if necessary.

All other Yellow Submarine staff and volunteers undertake appropriate induction and generalist safeguarding training to equip them to carry out their Safeguarding responsibilities effectively, which is kept up to date by refresher training at three yearly intervals. As part of Yellow Submarine's commitment all staff and regular volunteers are expected to complete our online safeguarding quiz to ensure they are aware of and act in accordance with our safeguarding procedure: [here](#). Full-time staff may also undertake additional safeguarding training for specific key topics as needed.

All staff (including temporary staff and volunteers), on appointment, sign to say they have read and are informed of Yellow Submarine's safeguarding arrangements on Induction.

G. Support, Advice and Guidance for Staff

Staff will be supported and guided by activity leaders, the senior management team, trustees, the Local Authority and relevant literature provided by Yellow Submarine. Yellow Submarine has a clear whistleblowing policy, and an open and honest environment is encouraged.

The designated senior manager for Safeguarding will be supported by the nominated trustee with the appropriate training. Immediate safeguarding concerns can be reported to the Multi-Agency Safeguarding Hub (MASH), who can be contacted on 0345 050 7666 or 0800 833 408 (out of hours, Emergency Duty Team). Non-immediate/ongoing concerns can be reported to the relevant Locality and Community Support Service (LCSS).

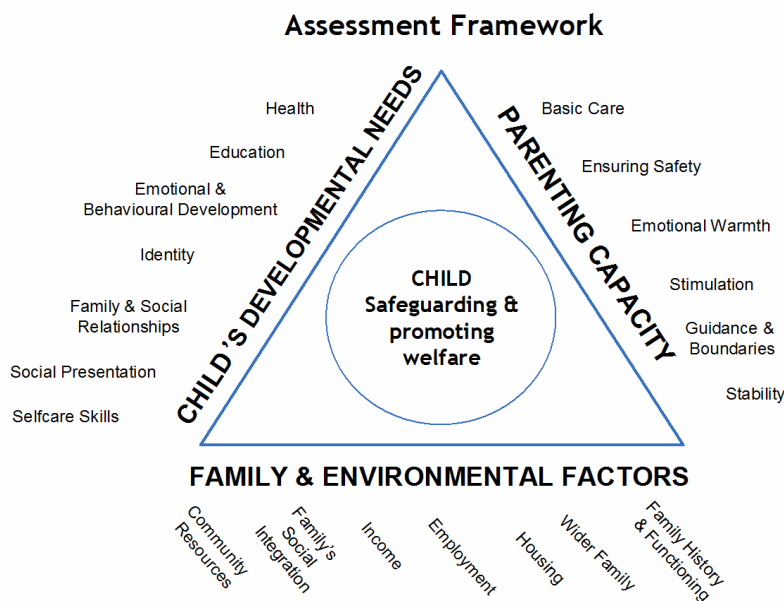
Information about reporting a concern, including concerns about child sexual exploitation or radicalisation and allegations against professionals, can be found on the Oxfordshire Safeguarding Children Partnership [website](#).

Yellow Submarine's Safeguarding Lead will make biannual checks to ensure that phone numbers and reporting procedures are up to date and disseminated throughout the organisation.

H. Related Policies

Yellow Submarine understands the inter-related aspects of a young person's wellbeing and ability to thrive.

Therefore, safeguarding is seen not as a response to an isolated event, but as an overriding approach to providing care that safeguards the wellbeing of young people.



From '[Working Together to Safeguard Children](#)'.

Where appropriate all Yellow Submarine policies will refer to Safeguarding, for example, the Equality and Diversity, Recruitment and Professional Boundaries policies.

Confidentiality

Yellow Submarine has due regard to OSCP Information Sharing Protocols. Where there is a concern that the young person may be suffering or is at risk of suffering significant harm, the young person's safety and welfare must be the overriding consideration.

Yellow Submarine has a clear and explicit confidentiality policy.

This policy indicates:

- a) When information must be shared with the police and Social Care where the young person/vulnerable adult is / may be at risk of significant harm
- b) When the young person's and/or parent's confidentiality must not be breached
- c) That information is shared on a need-to-know basis.

Equality and Diversity

Yellow Submarine has a clear Equality and Diversity policy, based on the Equality Act 2010,



which outlines the charity's application of this legislation to the practices, policies and procedures of its service delivery.

This Equality and Diversity Policy is also referred to in several other policies, including:

Recruitment and Selection
Disciplinary procedures
Professional boundaries
Safeguarding

Yellow Submarine is committed to ensuring equality of opportunity for all throughout the organisation, and to combatting discrimination and oppression in all its forms.

I. Young Person's Information

Yellow Submarine will endeavour to keep up-to-date and accurate information in order to keep young people safe and provide appropriate care for them.

Yellow Submarine requires accurate and up to date information regarding:

- names and contact details of the young person's main/principle parent or carer
- emergency contact details (if different from above)
- any relevant court orders in place including those which affect any person's access to the young person (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- if the young person is or has been on the Young person Protection Register or subject to a care plan
- name and contact detail of G.P. (as appropriate)
- details of the young person's educational provider (if appropriate)
- any allergies, medical needs, behavioural needs, religious/cultural requirements or physical needs
- any other factors which may impact on the safety and welfare of the young person.

This information is shared as needed with staff and volunteers to ensure good support of young people and members.

J. Roles and Responsibilities

Our Board of Trustees will ensure that:

- Yellow Submarine has a Safeguarding policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents and carers on request.
- Yellow Submarine operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with young people.
- Yellow Submarine has procedures in place for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures.



- A senior manager and deputy is designated to take lead responsibility for Safeguarding.
- Staff undertake appropriate Safeguarding training.
- Trustees remedy, without delay, any deficiencies or weaknesses regarding Safeguarding protection arrangements.
- A Trustee is nominated to be responsible for liaising with the LA and /or partner agencies in the event of allegations of abuse being made against the Manager with Lead Safeguarding responsibilities.
- Where services or activities are provided on Yellow Submarine premises by another body, the body concerned has appropriate policies and procedures in place in regard to Safeguarding young people and liaises with the Yellow Submarine on these matters where appropriate.
- Trustees review their policies and procedures annually.

Yellow Submarine's Safeguarding Lead

The Safeguarding Lead has overall responsibility for referrals, training and awareness-raising. These responsibilities are made clear in their job description.

The Safeguarding Lead will ensure that:

- the policies and procedures adopted by the Board of Trustees and senior management team are fully implemented and followed by all staff.
- sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities; and
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to young people, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies.
- cases of suspected abuse or allegations are referred to the relevant investigating agencies.
- there are adequate sources of support, advice and expertise within the charity.
- there is always cover for this role.

Training

- recognise how to identify signs of abuse and when it is appropriate to make a referral/raise a concern.
- have a working knowledge of how Oxfordshire Safeguarding Children Board operate, the conduct of a child protection case conference and be able to attend and contribute to these (if necessary).
- ensure that all staff have access to and understand Yellow Submarine's Safeguarding policy.
- ensure that all staff have induction training.
- keep detailed accurate secure written records of concerns.
- obtain access to resources and attend any relevant or refresher training courses at least every two years.

Raising Awareness

- ensure the Safeguarding policy is updated and reviewed annually and work with the Trustees and senior management team regarding this;



- ensure parents are made aware of the Safeguarding policy which alerts them to the fact that referrals may be made and the role of the Yellow Submarine in this to avoid possible conflict later.

All staff and volunteers

All staff and volunteers within Yellow Submarine have an inherent responsibility to:

- fully comply with Yellow Submarine's policies and procedures.
- attend appropriate training.
- inform the Safeguarding Lead of any concerns relating to the wellbeing of individuals.
- inform the Safeguarding Lead of any concerns relating to any staff or volunteers; or if the concern relates to the Safeguarding Lead to the Deputy Lead.
- Inform the Safeguarding Lead of any operational areas where individuals' needs may be neglected.

Key safeguarding resources can be found [here](#).

2. Identifying young people who may be suffering significant harm

Staff members working in an informal setting, particularly within a residential setting/activity or regular activity, are well placed to observe any physical, emotional or behavioural signs which indicate that a young person may be suffering significant harm. The relationships between staff, young people, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or Yellow Submarine staff being alerted to concerns.

Definitions

As in the Children Acts 1989 and 2004, a **young person** is anyone who has not yet reached his/her 18th birthday. For young people with learning disabilities, Yellow Submarine considers that young people may be older than this, but have the same needs, owing to an impaired intellectual and possibly emotional capacity.

Harm means ill-treatment or impairment of health and development, including, for example, harm suffered from seeing or hearing the ill-treatment of another; **Development** means physical, intellectual, emotional, social or behavioural development; **Health** includes physical and mental health; **Ill-treatment** includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children (From '[Working Together to Safeguard Children](#)').

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



deliberately induces, illness in a child (From '[Working Together to Safeguard Children](#)').

Possible indicators of physical abuse: Physical signs that do not tally with the given account of occurrence. Conflicting or unrealistic explanations of cause repeated injuries delay in reporting or seeking medical advice.

Sexual Abuse Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children From ('[Working Together to Safeguard Children](#)'). **Possible indicators of sexual abuse:** Sudden changes in behaviour; displays of affection which are sexual and age inappropriate; tendency to cling or need constant reassurance; tendency to cry easily; regression to younger behaviour – e.g. thumb sucking, acting like a baby; unexplained gifts or money; depression and withdrawal; wetting/soiling day or night; fear of undressing for swimming or sporting activities.

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meets the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone ('[Working Together to Safeguard Children](#)'). **Possible indicators of emotional abuse:** Rejection; Isolation; child being blamed for actions of adults; child being used as carer for younger siblings; affection and basic emotional care giving/warmth, persistently absent or withheld.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs ('[Working Together to Safeguard Children](#)'). **Possible indicators of Neglect:** Obvious signs of lack of care including: Problems with personal hygiene; Constant hunger; Inadequate clothing; Emaciation; Lateness or non-attendance at the setting; Poor relationship with peers; Untreated medical problems; Compulsive stealing and scavenging; Rocking, hair twisting, thumb sucking; Running away; Low self-esteem.



Child sexual exploitation Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology ([‘Working Together to Safeguard Children’](#)).

Key facts about CSE

- Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.
- It affects both girls and boys and can happen in all communities.
- Any person can be targeted but there are some particularly vulnerable groups: Looked After Children, Children Leaving Care and Children with Disabilities.
- Victims of CSE may also be trafficked (locally, nationally and internationally).
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.
- Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

Good practice – Individuals

- Recognise the symptoms and distinguish them from other forms of abuse.
- Treat the child/young person as a victim of abuse.
- Understand the perspective / behaviour of the child/young person and be patient with them.
- Help the child/young person to recognise that they are being exploited.
- Collate as much information as possible.
- Share information with other agencies and seek advice / refer to Social Care.

Good practice – Organisations

- Ensure robust safeguarding policies and procedures are in place which cover CSE.
- Promote and engage in effective multi-agency working to prevent abuse.
- Work to help victims move out of exploitation.
- Cooperate to enable successful investigations and prosecutions of perpetrators.

Guidance can be found here - Department for Education [Safeguarding Children & Young People from Sexual Exploitation \(2017\)](#)

Domestic Abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those **aged 16 or over** who are or have been intimate partners or family members. This can occur regardless of gender or sexuality. It can also encompass, but is not limited to, the following types of abuse: psychological, physical, sexual, financial and emotional abuse.

(From Home Office Information [for Local Areas on the change to the Definition of Domestic Violence and Abuse 2013](#))



Forced marriages (FM) FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014. A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

Link to the guidance: [here](#)

Female Genital Mutilation (FGM) FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for **any person (regardless of their nationality or residence status)** to:

- perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
- assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and
- Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a **UK national or permanent UK resident** (section 3 of the Act).

Link to the guidance - [here](#)

Practitioners understand the mandatory duty to report to police any case where an act of female genital mutilation appears to have been carried out on a girl under the age of 18.

Key resources and documents relating to FGM and other harmful practices can also be found [here](#).

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups; full government definition can be found [here](#).

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist ('[Working Together to Safeguard Children](#)').



Prevent is one of the four core elements of the: [Government's Strategy for countering terrorism \(CONTEST\)](#)

Pursue: to stop terrorist attacks; **Prevent:** to stop people becoming terrorists or supporting terrorism; **Protect:** to strengthen our protection against a terrorist attack; **Prepare:** to mitigate the impact of a terrorist attack

The Prevent strategy has three main objectives:

Objective one: Ideology – respond to the ideological challenge of terrorism;

Objective two: Supporting vulnerable people – prevent people from being drawn into terrorism; and

Objective three: Work with key sectors and institutions – address risks.

The Counter Terrorism & Security Act 2015; the Act places a Prevent duty on settings to have “due regard to the need to prevent people from being drawn into terrorism”. Settings subject to the Prevent Duty will be expected to demonstrate activity in the following areas

- Assessing the risk of children being drawn into terrorism
- Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies.
- Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Partnership.
- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism.
- Expected to ensure children are safe from terrorist and extremist material when accessing the internet in the setting.

OSCP information on PREVENT can be found [here](#); details of PREVENT training can be found [here](#).

3. Taking action to ensure that young people are safe at Yellow Submarine and in the community.

All staff will follow the Oxfordshire Child Protection Procedures which are consistent with '[Working Together to Safeguard Children](#)'.

It is **not** the responsibility of Yellow Submarine staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff and volunteers, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of young people will be recorded and discussed with the Safeguarding Lead (or another senior member of staff in the absence of the designated person) prior to any discussion with parents.

A. Staff must immediately report:

- any suspicion that a young person is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play/leisure.
- any explanation given which appears inconsistent or suspicious.
- any behaviours which give rise to suspicions that a young person may have suffered harm (e.g. inappropriate drawings or play).



- any concerns that a young person may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- any concerns that a young person is presenting signs or symptoms of abuse or neglect.
- any significant changes in a young person's presentation.
- any hint or disclosure of abuse from any person.
- any concerns regarding person(s) who may pose a risk to young person (e.g. living in a household with young person present).

B. Responding to Disclosure

Disclosures or information may be received from young people, parents or other members of the public. Yellow Submarine recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff and volunteers are expected to handle disclosures with sensitivity.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated person and make a contemporaneous record. Staff and volunteers should **never** agree to keep a secret, as they will have to share information of this nature.

Principles

Employees will not investigate but will, wherever possible, elicit enough information to pass on to the designated person in order that s/he can make an informed decision of what to do next.

Staff will:

- listen to and take seriously any disclosure or information that a young person may be at risk of harm.
- try to ensure that the person disclosing does not have to speak to another member of staff.
- clarify the information.
- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- try not to show signs of shock, horror or surprise.
- not express feelings or judgements regarding any person alleged to have harmed the young person.
- explain sensitively to the person that they have a responsibility to share the information to the senior designated person.
- reassure and support the person as far as possible.
- explain that only those who 'need to know' will be told.
- explain what will happen next and that the person will be involved as appropriate.

C. Action by the Safeguarding Lead (or other senior person in their absence)

Following any information raising concern, the Safeguarding Lead, or their deputy, will consider:



- any urgent medical needs of the young person
- discussing the matter with other agencies involved with the family
- consulting with appropriate persons e.g. Local Authority Safeguarding Officer (LADO)
- the young person's wishes

Then decide:

- wherever possible, to talk to parents, unless to do so may place a young person at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk.
- whether to make a referral to MASH, because a young person is suffering or is likely to suffer significant harm and the concerns need to be referred immediately or whether it would be more appropriate to seek advice from the LCSS.

OR

- not to make a referral at this stage
- if further monitoring is necessary
- if it would be appropriate to propose an alternative intervention (e.g. Early Help) and/or make a referral for other services – [LCSS and Early Help](#)

All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to social care will be accompanied by a standard referral form.

D. Action following a referral

The designated Safeguarding Lead, or other appropriate member of staff where appropriate, will:

- make regular contact with the Social worker/professionals involved to stay informed
- wherever possible, contribute to any strategy discussion, any Early Help Assessment Forms and Team around the Family meetings.
- provide a report for, attend and contribute to any subsequent Child Protection Conference if the young person or young person is placed on the Child Protection Register.
- contribute to the Young person Protection Plan and attend Core Group Meetings and Child Protection Conferences.
- where possible, share all reports with parents prior to meetings.
- where the Safeguarding Lead is in disagreement with a decision made e.g. not to apply Child Protection Procedures or not to convene a Child Protection Conference, will discuss this initially with the Lead Professional Social Worker, or if this does not resolve their concerns, will act in accordance with the Oxfordshire Escalation Policy relating to Child Protection Referrals. This can be found [here](#).

E. Recording and monitoring

Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records will be signed and dated, any information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

All Child Protection documents will be retained in a 'Safeguarding' file, separate from the young person's main file. This will be locked away and only accessible to the Safeguarding



Lead, their Deputy and the senior management team. Original copies will be retained until the young person's 25th birthday.

F. Supporting the young person and Partnership with parents

Yellow Submarine recognises that the young person's welfare is paramount, however good safeguarding practices and outcomes rely on a positive, open and honest working partnerships with parents and carers. Whilst Yellow Submarine may, on occasion, need to make referrals without consultation with parents, it will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any young person.

- We will provide a secure, caring, supportive and protective relationship for the young person.
- Young people will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why.
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the young person and their parents.
- The Safeguarding Lead will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the young person.

4. Allegations regarding person(s) working in or on behalf of Yellow Submarine (including volunteers)

Yellow Submarine will manage all allegations against staff and/or volunteers in accordance with guidance from the OSCP ([LADO](#)) and Oxfordshire County Council. The Designated Safeguarding Lead will liaise with the Local Authority Designated Officer ([LADO](#)) on all matters of concern which meet any of the following criteria:

A member of staff or volunteer has:

- behaved in a way that has harmed a young person or may have harmed a young person.
- possibly committed a criminal offence against, or related to, a young person or
- has behaved towards any young person in a way that indicates s/he is unsuitable to work with young people.
- where an allegation is made about abuse that took place some time ago and the accused person may still be working or having contact with children, or this alleged abuse has not been investigated.

Whilst Yellow Submarine acknowledges such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

Initial Action

- The person who has received an allegation or witnessed an event will immediately inform the Safeguarding Lead and make a record.



- In the event that an allegation is made against the Safeguarding Lead, the matter will be reported to the Deputy Safeguarding Lead, who will proceed as the Safeguarding Lead.
- The Safeguarding Lead will take steps, where necessary, to secure the immediate safety of young people and any urgent medical needs.
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of young people.
- The Safeguarding Lead may need to clarify any information regarding the allegation, however no person will be interviewed at this stage.
- The Safeguarding Lead will consult with the Local Authority Designated Officer (LADO) in order to determine if it is appropriate for the allegation to be dealt with by Yellow Submarine or if there needs to be a referral to social care and/or the police for investigation.

Consideration will be given throughout to the support and information needs of young people, parents and staff. The Safeguarding Lead will inform the Trustees of any allegation.

Yellow Submarine will not attempt to investigate allegations or concerns which meet any of the above criteria through other mechanisms such as the organisation Complaints Procedure or Disciplinary Procedures, unless written agreement to do so has been confirmed by the Local Authority Designated Officer (LADO).

However, if it is deemed that an individual member of staff or volunteer poses a real and immediate threat to a Yellow Submarine member (adult or child), or the individual may prejudice any investigation into the allegations by continuing to have contact with members, they will be suspended, without prejudice and with pay (for contracted staff), until Yellow Submarine - in partnership with the LADO - can investigate the allegations. Such investigations may, consequentially, result in the use of Disciplinary policy to address unacceptable behaviour, e.g. gross misconduct.

Yellow Submarine will provide the Local Authority Designated Officer (LADO), the Police and Oxfordshire County Council's Safeguarding team with any personal data/information about staff members, governors, children or parents which the said organisation(s) deem relevant to child or adult protection enquires.

Yellow Submarine will attend all strategy meetings organised, in agreement with the LADO, to discuss allegations made against staff and/or volunteers and will provide the meeting with any necessary reports as required.

Yellow Submarine Governance Responsibilities.

The Board of Trustees will seek assurance that appropriate steps are taken to minimise the risks to vulnerable people of abuse of any sort and that, should there be any allegation of abuse, that this policy has been enacted.

The Designated Safeguarding Lead will ensure that safeguarding forms part of every trustee meeting, and that any recorded incidents are reported to the board.

Yellow Submarine operates an incident recording system whereby staff and/or volunteers record unusual incidents, issues or actions involving staff/volunteers and members which they feel may possibly be misconstrued at a later date. Yellow Submarine, in particular the Designated Safeguarding Lead will ensure that any such issues, incidents or actions which



are of immediate concern in accordance with Child Protection or other organisation procedures, will be actioned in accordance with agreed arrangements and protocols.



Safeguarding Contacts (Appendix I)

Yellow Submarine's Safeguarding Lead is:

Kate Sankey (Co-Director)

Tel: 01865 236119 or 07890 087168

kate@yellowsubmarine.org.uk

Yellow Submarine's Deputy Safeguarding officers are:

Toby Staveley (Trustee)

Tel: 01865 236119

Anna Cheetham (Co-Director)

Tel: 01865 236119 or 07979 151975

anna@yellowsubmarine.org.uk

Thames Valley Police 101 (non-emergencies)

Emergency Police Assistance 999

NSPCC 0808 800 5000

Reporting concerns

Multi-agency Safeguarding Hub (MASH) - 0345 050 7666

(Young People & Vulnerable adults)

Emergency Duty Team: **0800 833 408**

Complete an online referral – [here](#)

For non-immediate concerns (LCSS):

Tel: 0345 2412705

Email: LCSS@oxfordshire.gov.uk

Further details for the LCSS and Early Help support can be found here -

<https://www.oscb.org.uk/practitioners-volunteers/locality-and-community-support-service-early-help/>

To report concerns about a professional or person in a position of trust contact the Local Authority Designated Office (LADO) on 01865 810603 (Team number) or

LADO.safeguardingchildren@oxfordshire.gov.uk

Further details about the LADO team can be found [here](#)

Oxfordshire Safeguarding Children's Partnership (OSCP): <https://www.oscp.org.uk/>

Oxfordshire Safeguarding Adults Board (OSAB): <https://www.osab.co.uk/how-to-report-concerns/>



Other Useful Contacts

NSPCC Young person Protection Helpline

0808 800 5000

www.nspcc.org.uk

24 Hour Helpline for anyone concerned about a young person at risk of abuse.

Survivors Space, Oxfordshire

01865 965201

<https://www.survivorspace.org.uk/>

NAPAC (The National Association for People Abused in Childhood)

0808 801 0331

<http://napac.org.uk/>

Support for adult survivors of any form of young personhood abuse.

Support, advice and guidance via the freephone national information line.

Stop It Now!

0808 1000 900

<https://www.stopitnow.org.uk/>

Confidential helpline for those who suspect someone they know is abusing a young person online, or who are worried about their own thoughts or behaviour.

Young person Exploitation and Online Protection (CEOP)

<https://www.ceop.police.uk/Safety-Centre/>

Child Exploitation and Online Protection Command



Safeguarding Young People in Oxfordshire Useful Publications (Appendix II)

Information on how to report a concern can be found on the OSCP website:
Oxfordshire County Council Safeguarding Policy and Procedures can be found by visiting the Oxfordshire Safeguarding Children's Board website:
<https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/> Or by contacting the Local Authority Designated Office: 01865 810603 (LADO Team number)

Department for Education - Working Together to Safeguard Children:
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>



Safeguarding Policy Protecting Young People and Vulnerable Adults (Summary) v1.8

Safeguarding Key Information	
Designated Safeguarding Lead	Kate Sankey, Co-Director
Deputy Safeguarding Lead	Toby Staveley, Chair of Trustees and Anna Cheetham, Co-Director
MASH (Multi Agency Safeguarding Hub) - 0345 050 7666	
Reporting concerns (Young People)	https://www.oscp.org.uk/
Reporting concerns (Adults)	https://www.osab.co.uk/how-to-report-concerns/

Yellow Submarine recognises that the welfare of vulnerable adults, children and young people is paramount and that they have equal rights of protection. The organisation has a duty of care when young people and vulnerable adults are in its charge and will do everything possible to provide a safe and caring environment for members whilst they attend activities.

Yellow Submarine employees and volunteers will:

- Treat all members, young or old, with respect, and celebrate their achievements.
- Carefully recruit and select all staff and volunteers.
- Respond to concerns and allegations appropriately.
- Act in accordance with the Safeguarding Procedures of Oxfordshire Safeguarding Children Board and Oxfordshire Safeguarding Adults Board. These can be found at:

Young People:

<https://www.oscp.org.uk/>

<https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/>

Vulnerable Adults:

<https://www.osab.co.uk/how-to-report-concerns/>

When there are concerns about the welfare of any young person or vulnerable adult, whether whilst in the charity's environment or in the wider community, home setting or otherwise, all responsible adults in our organisation are expected to share those concerns with the organisation's Safeguarding Lead.

These concerns can relate to any area of a member's life if it is having or may have an adverse effect on their welfare. It may include targeted abuse but may also include general concerns relating to circumstances or other influences.



The terms commonly used to describe areas where well-being may be compromised include:

- **Physical:** Physically hurting, or threatening to physically hurt, someone.
- **Emotional:** Failing to meet the emotional needs, or damaging the emotional health, of someone. This includes bullying, isolation, undermining of ability, skill, self-worth, threats to well-being – this list is not exhaustive, and all abuse will include some level of emotional harm.
- **Sexual:** Engaging young people or people unable to give informed consent (such as those with limited mental capacity) in sexual activity. This will include a power imbalance or abuse of power within the abusive relationship.
- **Neglect:** Persistently neglecting the physical, emotional and spiritual needs of someone.
- **Sexual Exploitation:** A concerted campaign to exploit a young person or vulnerable adult through sexual activity, for the gratification of others. This is usually linked to wider crime networks and those targeted are usually extremely vulnerable.
- **Domestic Abuse:** Abuse of an individual, in whatever way, by someone related through intimacy or as family.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

All employees are expected to familiarise themselves with the Yellow Submarine Safeguarding Policy, in order that they are able to manage their own, and volunteers', reactions and responses to disclosures or concerns.

This Safeguarding Policy describes in detail the way in which Yellow Submarine will respond to any concerns about the wellbeing of the young people in its care. Employees and volunteers are also expected to attend Safeguarding training when directed, at a minimum of every three years.

Vulnerable adults will be treated with the same high level of awareness, swift response and thorough investigation that is afforded to young people, in instances where there is concern for their wellbeing. This is in response to the difficulties Yellow Submarine's members often face in their levels of understanding, confidence, ability to interpret social interactions, and the power imbalance that may be present in their day-to-day interactions with others. The Safeguarding Lead has the responsibility to judge the extent to which a vulnerable adult's expressed feelings should be disregarded for the purposes of fulfilling the organisation's duty of care to keep the member safe.

The Safeguarding Lead is responsible for (summarised):

- Ensuring that all concerns, however small, are recorded and responded to appropriately.
- Making referrals to MASH or to the LCSS/Responsible Locality or when the family are already receiving support to the appropriate social care team.



- Investigating (as far as is agreed to be appropriate in partnership with the Local Authority Designated Officer) any concerns raised about the conduct of a Yellow Submarine employee or volunteer.
- Liaising with other agencies or supporting other members of the team to do so.
- Ensuring that Safeguarding training for all staff is in place and monitoring its effectiveness.

Confidentiality

In cases of disclosure of abuse by vulnerable adults, parents, carers, young people or other groups, all responsible adults are obliged to share the information with the Safeguarding Lead, who may have to refer concerns appropriately according to safeguarding procedures e.g. MASH or the LCSS, or the police in an emergency.

It is essential that all employees and volunteers are aware that they are not, under any circumstances, able to give a member assurance that they will “keep a secret” or “not tell anyone”. The decision about what should be done when information is disclosed rests with the Safeguarding Lead. Yellow Submarine members should all be made aware that, if an employee or volunteer has any concerns about a member's welfare, they will pass this on so that the member can be kept safe.

Staff Allegations

Concerns about the behaviour of responsible adult/s in the organisation should be passed on without delay to the Safeguarding Lead. If the allegation is concerning the safeguarding lead, these concerns should be passed on to the Deputy Safeguarding Lead; or if this is still not appropriate, under Yellow Submarine's “Whistleblowing Policy”, they should contact Oxfordshire County Council's Local Authority Designated Office (LADO) on 01865 810603 or by emailing - LADO.safeguardingchildren@oxfordshire.gov.uk

Policy Reviewed by: Kate Sankey
Date Reviewed: 20th March 2025
Next Review: March 2026



Smoking and Vaping Guidance in the Workplace v1.7

This policy outlines Yellow Submarine's responsibilities and expectations relating to smoking and vaping in the workplace, specifically the employer's approach to safeguarding the well-being of all employees and volunteers whilst carrying out their duties.

Smoking is one of the main causes of preventable premature death in the UK. This policy does not seek to condone or condemn smoking but is written under the premise that it is beneficial to one's health to not smoke. All members of Yellow Submarine, whether employee, volunteer, member, family member, carer or visitor, have the right to access our services without being exposed to the risks that passive smoking poses.

Guidance regarding the law relating to smoking in public places can be found at: [Ash – smoke free legislation](#); further guidance regarding the law relating to smoking in workplaces can be found – [gov.uk guidance](#).

The guidelines outlined in this policy also apply to e-cigarettes and vaping.

Working with under 18s.

Smoking and passive smoking poses a very real risk to our young members, and they should not be exposed to passive smoke nor go unchallenged or unsupported if they themselves smoke. With this in mind Yellow Submarine, will only permit employees or volunteers to smoke or vape during working/volunteering hours when the following guidelines are met:

- Employees/volunteers are completely out of eyesight of our young members.
- Employees/volunteers are on a break from their duties, and when on activities or residential trips, a break is agreed by the Activity Leader.
- Employees/volunteers keep smoking paraphernalia out of sight and reach of our young people at all times.
- Employees/volunteers wash their hands after smoking, especially when preparing food or giving personal care.
- Employees/volunteers adhere to the organisation Fire Risk assessment regarding smoking.

Employees/volunteers must not:

- Provide any cigarettes, lighters, cigarette papers, tobacco, matches, vapes or refills to young people, or leave their own smoking/vaping paraphernalia in an unsecured manner where a young person could access them.
- Smoke/vape in any Yellow Submarine vehicle or allow anyone else to do so.
- Smoke/vape where they may be seen by young people.
- Give money at any time to young people to buy cigarettes/vapes.

As Yellow Submarine's activities and residential breaks are commonly held in unfamiliar surroundings, holiday cottages, public venues etc., employees and volunteers are expected to



seek guidance from the activity leader as to where would be acceptable to smoke/vape, and follow the directions given.

Employees and volunteers have at all times, a duty of care towards our young members. If a young person is seen to smoke/vape or states that they do smoke/vape, this information should be passed on to the activity leader so that they can share this information with parents/carers.

Working with vulnerable adults

Yellow Submarine recognises that, in working with vulnerable adults, there is a balance to be struck between caring for and protecting our vulnerable adult members, and respecting their right to smoke/vape, if they wish. Yellow Submarine, at all times, wishes to protect our members from second-hand smoke/passive smoking.

During our adult activities, particularly residential holidays, it is likely that employees and volunteers will encounter members who wish to smoke at some point. In this instance the following guidelines should be observed:

- It is an offense (against the law) to smoke indoors in enclosed or partly enclosed public places. This includes holiday cottages, minibuses, porches, lean-tos, public transport etc. Whilst it's not illegal to vape inside the same guidance would be followed for vaping.
- As far as possible and practical, if members wish to smoke/vape, they should be guided to smoke at least 5 meters away from the door of the house or venue, or in spaces designated clearly by signage. If this is unsafe, (for reasons relating to the individual's care needs) then the person should be accompanied by a volunteer or employee who agrees to assist them. No employee or volunteer should be, or feel, pressurised to assist members in this way, and so as a last resort members who smoke and need supervision may stand as close as 2 meters from the door, but with the door pulled shut as much as possible.
- Members should be encouraged to wash their hands after smoking.
- Members who smoke/vape often benefit from the social interaction and attention associated with spending time with a fellow smoker/vaper. Yellow Submarine does not wish to prohibit employee/volunteer smokers from smoking with an adult member, but advises that this should be avoided as much as possible, so as not to encourage smoking.
- Members who wish to cut down or stop smoking/vaping should be encouraged to do so, and employees and volunteers should discuss with members the possibility of passing this information on to a carer, family member or other professional so as to support the members in their health aspirations.

Working in the Café.

In working in a food preparation environment, it is essential that employees and volunteers are clean and hygienic in order to comply with food safety standards. Therefore, Yellow Submarine strongly discourages members, employees or volunteers who are working in the café from smoking whilst on duty.



However, if trainees, employees or volunteers do smoke, the following rules should be adhered to:

- Smoking should only take place within the recognised break, as agreed with the Café manager or supervisor. "Cigarette breaks" should not be taken above and beyond an individual's recognised break allowance.
- Smokers should stand well away from the building, particularly when wearing Yellow Submarine uniform.
- Smokers should wash their hands after smoking and before returning to café duties. If a trainee, employee or volunteer smells of smoke they may be asked to change their top and take the dirty one home to wash.

Employees and volunteers who wish to cut down or stop smoking will be encouraged and supported to do so.

Policy Reviewed by: Kate Sankey
Date Reviewed: 11th February 2025
Next Review: February 2026



Staff Support Policy v1.7

Sick Leave, Maternity Leave, Paternity Leave, Adoption Leave, Parental Leave, Compassionate Leave, and Staff Support.

Yellow Submarine aims to be a supportive and compassionate employer, and to offer employees the support they need to perform well in their roles, maintain a good work-life balance, and recover quickly when illness or ill fortune occurs. This policy outlines the support that Yellow Submarine is able to offer, and the guidelines for offering such support in the event that an employee finds themselves unable to attend work as contracted.

As a small employer, Yellow Submarine is not legally required to offer an occupational scheme relating to sick pay, maternity leave, adoption leave, paternity leave or compassionate leave. The size and capacity of Yellow Submarine means that this is not, at present, a requirement of the organisation as employers. However, as the organisation grows, this will be reviewed.

Sick Leave: In the event of sickness absence, employees are expected to inform their Line Manager of their incapacity to work, including details of how long they expect the sickness to last. Employees should self-certify for the first seven days of absence from your position and should update their Line Manager each day as to their condition and expected date of return. Employees may be asked to complete a self-certification form. For periods longer than seven days, employees will be asked to provide a doctor's note covering ongoing absence.

Yellow Submarine may or may not offer pay during sickness absence, at the discretion of senior management. Employees may be entitled to statutory sick pay. More information regarding this is available at [gov.uk – sick pay](https://www.gov.uk/sick-pay). If you require any information or support to claim statutory sick pay, impartial advice and guidance can be found at [Citizens Advice](https://www.citizensadvice.org.uk/).

Further information regarding the statutory sick leave and pay arrangements that Yellow Submarine adheres to, can be found at [Citizens Advice](https://www.citizensadvice.org.uk/).

Appointments: Yellow Submarine is committed to ensuring that employees are able to maintain good levels of health and well-being. Therefore, as employers, the organisation is committed to allowing employees, wherever possible, to work their contracted hours flexibly, in order that health and well-being can be maintained. Wherever possible, appointments should be made outside the employee's normal working hours.

However, requests to change working patterns temporarily to allow attendance at an appointment, where there is no other option, should be made to the employee's Line Manager, and requests will not be refused without just cause. Employees should be prepared to show evidence of appointments, if requested.

Reduction of risk relating to infectious illnesses: As an organisation working with people with learning disabilities, Yellow Submarine recognises that some members access our services with accompanying medical conditions. Some of these conditions may leave them more vulnerable



than the average population to diseases, infections and common illnesses such as flu and sickness bugs.

If an employee is ill with an illness that is infectious, such as (but not limited to) colds, flu, viruses such as Covid-19 sickness and diarrhoea or impetigo, they should in the first instance seek medical advice as to whether or not they are still considered contagious. This information should be passed to their Line Manager, in order that a decision can be made as to whether or not they can attend their place of work without putting any of our vulnerable members at risk. If employees are feeling well enough to return to work, or indeed perhaps were never absent from work, they may be reassigned to another work area temporarily, to minimise any risks. If in any doubt, employees should approach their Line Manager for further advice.

Information in relation to returning to work after a bout of diarrhoea or vomiting for those members of staff working in the café or where the staff member's role may involve the handling of food can be found here – [food.gov.uk](https://www.food.gov.uk) - Yellow Submarine follows this guidance and the stipulation that Managers must exclude staff with these symptoms (diarrhoea and/or vomiting) from working with or around open food, normally for 48 hours from when symptoms stop naturally.

Adoption, Maternity and Paternity Leave and Pay: Yellow Submarine is not required to offer an occupational scheme relating to maternity, paternity or adoption leave and pay, owing to the current size of the organisation. However, pregnant staff members, the partners of someone who is pregnant and adoptive parents are, nonetheless, entitled to take leave for the birth or arrival of their child/ren.

Statutory pay for Adoption, Maternity and Paternity Leave may be available to employees, depending on the employee's qualifying status and entitlement. Employees can find further information on statutory leave and pay at:

[Maternity Pay](#)

[Paternity Pay](#)

[Adoption Pay](#)

Parental Leave: Parent employees who have been employed by Yellow Submarine for more than one year may qualify to take leave from their role under particular circumstances, relating to the care and well-being of their child or children. To check eligibility and the terms under which leave can be taken, employees should visit:

[Parental Leave](#)

If any variation to this entitlement is requested by the employee (for example, to take parental leave with less notice period), this must be submitted to the Line Manager. Yellow Submarine will try to accommodate reasonable requests and assist parents in the tough job of bringing up children.



Compassionate Leave: Yellow Submarine is a supportive employer and wishes to ensure that all employees are able to maintain a good work-life balance, as well as be able to meet their needs outside the workplace.

Occasionally, employees may find themselves in a position where they are temporarily unable to meet their work commitments, due to significant events in their personal lives. This may include:

- Death of a partner, child, close family member or close friend
- Serious illness or injury of a partner, child, close family member or close friend
- Significant life events, such as becoming the victim of a serious crime or a fire at one's home
- Having to temporarily provide a caring role to someone who is not your child, where no alternative can be found.

Yellow Submarine will endeavour to assist the employee to accommodate this need for time away from their duties, and in the first instance the employee should approach their Line Manager to inform them of the circumstances. It will be the discretionary decision of the senior management team as to whether or not compassionate leave can be granted, and for how long.

Staff Supervisions and support: Yellow Submarine is committed to ensuring that staff feel supported in their roles and are given the opportunity to raise any concerns and to review their role within the organisation. For full-time and part-time staff supervisions should take place at least every three months – however, employees should feel able to ask their line managers for a meeting as needed so that any issues can be addressed in a timely manner.

Sessional staff are also given the opportunity to review their roles with the appropriate senior staff member, this may be done every three months or after periods of delivery which they have been involved whichever is more appropriate depending on role and commitment. Sessional staff supervisions may take place in person or on the phone as appropriate.

Policy Reviewed by: Kate Sankey
Date Reviewed: 11th February 2025
Next Review: February 2026



Staff Recruitment, Training and Development Policy

v1.7

This policy outlines Yellow Submarine's commitment to appropriate and fair recruitment, and the development of staff skills, expertise and ability in the delivery of their work within the organisation, as well as to supporting the career related aspirations of individual employees and volunteers.

Recruitment

Yellow Submarine recognises fully that the charity's greatest asset is its workforce. The employees, volunteers and supporters of the charity's work are essential to providing an excellent service to our members.

Yellow Submarine will, on an ongoing basis:

- assess present and future recruitment needs.
- formulate training programmes.
- develop promotion and career development policies.
- anticipate and, where possible, avoid redundancies.
- develop a flexible workforce to meet changing requirements.
- control staff costs whilst ensuring salaries remain competitive.

In the eventuality that recruitment may be required to fill gaps in the workforce in capacity, skills or otherwise, Yellow Submarine will first and foremost look to develop and offer opportunities to existing employees, and recruit internally. Where no candidate is identified as appropriate to fill a new or vacant role, the management team will recruit externally.

Recruitment will always take place according to Safe Recruitment Practices, adopted by Yellow Submarine as part of their commitment to Safeguarding Children and Vulnerable Adults in their care. This blanket approach reflects the need of the charity to be flexible but safe, and recognises that all employees may, at any point, be in contact with young people and vulnerable adults.

Yellow Submarine is an exempt organisation under **Section 2 of the Rehabilitation of Offenders Act 1974 and Offender Rehabilitation Act 2014**, and therefore all applicants must declare any convictions they may have, which are then open to consideration by Yellow Submarine as part of their recruitment processes. Having a conviction will not unfairly be used as a reason to withhold an offer of employment, and each applicant will be considered in light of all applicable information.

All employees of Yellow Submarine will be required to agree to a **Disclosure and Barring Service (DBS)** check; a satisfactory check (as well as satisfactory references) will be required before employees are able to assume their duties. DBS check guidance can be found here - [applicants](#) / [employers](#).



Yellow Submarine works hard to be a fair employer, and is committed to ensuring that all applicants, irrespective of any characteristic that is either “protected” under the **2010 Equality Act**, or otherwise irrelevant to their ability to perform the role to which they are applying, are not unfairly excluded or discouraged from applying for a position with Yellow Submarine. Similarly, Yellow Submarine is committed to the continuous development of its policies and procedures to ensure that individuals are actively encouraged and supported to apply for and accept a role for which they are the strongest candidate.

In order to aid excluded, marginalised or otherwise disadvantaged individuals to apply for and potentially play a full role in the organisation, Yellow Submarine will endeavour to make any reasonable adjustments necessary, proportionate to the size of the organisation, the resources available to it and the requirements of the role. This is likely to relate mainly to disability, but may also include factors such as caring responsibilities, or other factors which historically have prevented certain groups from gaining or maintaining employment.

Supervisions & Appraisals

Yellow Submarine is committed to ensuring that staff feel supported in their roles and are given the opportunity to raise any concerns and to review their role within the organisation. For full-time and part-time staff supervisions should take place at least every three months – however, employees should feel able to ask their line managers for a meeting as needed so that any issues can be addressed in a timely manner. Yellow Submarine is aware that it is vital for staff to feel valued and as part of this it is key that they feel involved in the development of their role as well as the development of the organisation.

Sessional staff are also given the opportunity to review their roles with the appropriate senior staff member, this may be done every three months or after periods of delivery which they have been involved whichever is more appropriate depending on role and commitment. Sessional staff supervisions may take place in person or on the phone as appropriate.

All line managers/senior staff leading supervisions are given guidance for supervisions. This information should be circulated to staff prior to their supervision.

Training

Yellow Submarine recognises that the effective development of staff is essential to meeting future goals as an organisation, and in the development of a well-managed and successful charity with satisfied employees, volunteers and members.

This policy applies to all members of staff and volunteers, regardless of responsibility levels, length of service, working patterns or any other irrelevant distinctions. Implementation of this policy will pay due regard to Yellow Submarine's Equality and Diversity Policy.

Responsibilities: Staff training and development is the responsibility of all staff in the organisation, but in particular:



- Senior Managers - to promote a positive culture of learning development, to identify and secure adequate resources for training and development and to identify key strategic plans for workforce development
- Line Managers – to use the organisational supervisory and management processes to assist in identifying training and development needs, to support staff in aspiring to learning and development, to liaise with senior managers to secure appropriate training and to assess the effectiveness of training undertaken.
- Individual employees and volunteers – to take responsibility for identifying areas of their practice and skills that might be developed, to make themselves aware of any opportunities, to engage fully with opportunities offered, and to apply this new learning to their practice and share with the organisation as a whole, where appropriate.

Identifying Development Needs: Yellow Submarine will assess development needs, both organisationally and individually, and assessment will take place at all levels of responsibility.

Individual needs and aspirations should be explored both on an individual's introduction to the organisation and periodically throughout their time at Yellow Submarine, through Line Management, supervisions and appraisal structures.

Organisational needs will be reviewed regularly as part of the work of the management team and will work towards meeting strategic needs. All individuals are encouraged to contribute to strategic plans and highlight any areas where they have observed that training and development would benefit the organisation in whatever way. Yellow Submarine is committed to engaging employees and volunteers in the steering and development of the organisation and will, as far as possible, ensure that suggestions and observations can be submitted easily.

Mandatory Training Provision: Yellow Submarine will ensure that all staff and volunteers receive the following training as soon as possible following their recruitment.

- Health and Safety
- Safeguarding
- Equality and Diversity
- Confidentiality
- Data Protection
- Professional Boundaries

This training is specific to the nature of the work of Yellow Submarine, and may be supplemented, depending on the role of the individual. All employees and volunteers will be provided with induction packs, outlining Yellow Submarine's key operational policies and should know how & where to access the full Yellow Submarine policies pack; for example, [policy pack](#). All individuals should familiarise themselves with this document, as it forms the basis of all performance management within the organisation.

On the job training: All employees and volunteers will be allocated a line manager – in the case of volunteers this will ordinarily be the Volunteer Manager, in partnership with any paid employees supervising the volunteer during an activity e.g. Activity Managers.



Yellow Submarine, as part of its induction for new employees and volunteers, will ensure that each individual is given adequate support to carry out their role, in a format which encourages, facilitates and empowers individuals to reach their potential. Regular informal feedback will form the basis for much learning and development.

Further Education: Yellow Submarine is committed to the ongoing development of its employees, and paid employees will be made aware of the possibility of the organisation supporting employees to access training through further and higher education. Where this is envisaged by the employee as being a potential way to develop their career, they should approach in the first instance their Line Manager and work together to put together a proposal to present to the senior managers.

The proposal will be considered fairly and will be assessed in relation to the needs of the organisation, the appropriateness of the level of training being proposed, and any other factors which may be relevant.

Mentoring: As part of its employee and volunteer offer, Yellow Submarine will facilitate, where appropriate and desired, mentoring relationships between individuals and a suitable person. The aim of mentoring is to encourage, support and reflect with an individual to assist them to learn and develop in their work setting.

Mentoring is available to all staff, and mentors may be drawn from internal or external sources, depending on the available skills within the workforce. Mentoring relationships will be agreed before commencement of the arrangement and will be subject to regular review.

Policy Reviewed by: Kate Sankey
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Next Review: February 2026



Volunteer Policy v1.7

Yellow Submarine hugely appreciates the contribution that volunteers make to the organisation, and strives to ensure that volunteers are recruited, supported and trained in a way which both meets their needs and the needs of the organisation.

Procedures: Recruitment and selection of volunteers is the responsibility of Yellow Submarine's paid employees, and will be undertaken in accordance with the Equal Opportunities Policy paying adherence to safer recruitment guidelines. To volunteer at Yellow Submarine you must be aged 16 years or over, there may also be project specific age requirements too. Volunteers will need to apply via the [Volunteer Application Form](#), supply at least 2 references (one of which should be from a recent employer, training provider, college or school).

Volunteers must agree to a Disclosure Background Service (DBS) check if this deemed necessary for their role and level of commitment, for guidance on whether a volunteer is required to complete a DBS check see [here](#).

Recruitment will always take place according to Safe Recruitment Practices, adopted by Yellow Submarine as part of their commitment to Safeguarding Children and Vulnerable Adults in their care. This blanket approach reflects the need of the charity to be flexible but safe, and recognises that all volunteers may, at any point, be in contact with young people and vulnerable adults.

Yellow Submarine is an exempt organisation under **Section 2 of the Rehabilitation of Offenders Act 1974 and Offender Rehabilitation Act 2014**, and therefore all applicants must declare any convictions they may have, which are then open to consideration by Yellow Submarine as part of their recruitment processes. Having a conviction will not unfairly be used as a reason to withhold an offer to volunteer, and each applicant will be considered in light of all applicable information.

The Yellow Submarine volunteer recruitment process is detailed on SharePoint (HR workspace).

Areas of work where volunteers may be helpful have been identified across Yellow Submarine's activities. Opportunities will be advertised locally and through other partner agencies where appropriate.

When a potential volunteer gets in touch the volunteer manager will arrange a meeting (unless this is not possible; then the potential volunteer may meet with staff other than the volunteer manager if more appropriate/feasible) after meeting the interested party the volunteer manager will send them the volunteer application form to complete. Once the application has been received the volunteer manager will seek references. Once both references have been returned the volunteer manager will invite the volunteer to their first session, putting them in touch with the activity leader and sending details of the activity. With their consent, the volunteer will be added to our volunteer mailing list to receive newsletters.



At their first session/after appointment:

In line with our safer recruitment procedure the first time a volunteer attends an activity/shift:

- They will be asked to bring photo I.D.
- They will be asked to read and sign our 'essential policy/ code of conduct' document.
- They will be asked to bring a copy of their DBS, if applicable.

The Activity Leader or Volunteer Manager will take a copy of the above documents & upload to the volunteer's Huddle File and share with volunteer manager.

At their first activity with Yellow Submarine (or upon agreeing to attend their first activity with Yellow Submarine), volunteers will be asked to read and abide by our Essential Policy document which outlines roles and responsibilities – found [here](#). Yellow Submarine will take a copy of this agreement and will keep it with the volunteer's application form. Alongside this volunteers will be asked to bring a form of photo identification to their first activity a copy will be taken and kept on the volunteer's record.

The volunteer manager or activity leader/supervisor will discuss the relevant description of their role with the volunteer, so that they have a clear picture of their tasks and level of responsibility. Employees will be made aware of the volunteer's role, and volunteers will be given encouragement, advice and support to take up appropriate training opportunities. A record of every volunteer's work will be kept and references will be supplied on request. Personal information will be treated as confidential.

Terms and Conditions of Voluntary Work: Volunteers are required to work in accordance with Yellow Submarine's policies and it is the responsibility of both the volunteer and their supervisor (usually an Activity Manager) to ensure that there is clear understanding of these policies and their implementation.

Volunteers are subject to Yellow Submarine's Disciplinary Policy and Grievance Procedure. Volunteers are asked to attend at the agreed times, and to inform the relevant contact at Yellow Submarine if unable to attend through illness, accident or emergency. Volunteers who wish to stop volunteering should discuss this with their supervisor and agree a finishing date (as appropriate).

Volunteers will be covered by adequate insurance while working for Yellow Submarine. They will not be expected to pay for refreshments while they are at work, within reasonable limits. Volunteers will be reimbursed their actual expenses incurred in carrying out voluntary duties for Yellow Submarine, subject to the agreement of the supervisor and on production of a receipt or ticket. All expenses should be agreed in advance, including travel expenses incurred. Travel should be by the cheapest means available. This may include car mileage, if agreed beforehand.

Yellow Submarine will ensure that volunteers receive and agree to the code of conduct and relevant policies of the organisation prior to beginning work.



Policy Reviewed by: Kate Sankey
Date Reviewed: 13th February 2025
Next Review: February 2026



Volunteer Policy – Disclosure procedure (Appendix I)

If a perspective volunteer's Disclosure and Barring Service (DBS) check comes back containing a disclosure of a conviction, the volunteer must make the volunteer manager aware of the information by producing their certificate. Volunteers will not be able to volunteer unless they produce their certificate. In most instances, it is likely the volunteer manager will be aware of any convictions during the application process the management team will risk assess the information and communicate with the volunteer whether they will be able to volunteer and if any conditions will be put in place.

Staff & Volunteers code of conduct (Appendix II)

I agree to:

- Treat all vulnerable adults and young people with respect and dignity
- Ensure that their welfare and safety is paramount at all times
- Always act in a respectable and responsible way
- Liaise openly with parents & carers
- Only use physical contact if absolutely necessary and appropriate
- Avoid being alone with vulnerable adults, young people and children at all times except where strictly necessary and appropriate, and agreed with my supervisor
- Listen to, and act upon, any disclosures / allegations / concerns of abuse
- Undertake appropriate safeguarding training as required
- Do my best to make activities fun and enjoyable!



Whistleblowing Policy v1.7

Yellow Submarine's Whistleblowing Policy is written to reassure any individual involved with the organisation, whether employee, trustee, member, volunteer, parent, carer or otherwise, that any concerns about the proper stewardship of the organisation, the proper use of funds, concerns about fraud, about the safety and welfare of members or any other concern, should be raised and addressed without delay.

In order to be a trustworthy and accountable organisation, Yellow Submarine encourages individuals with any such concerns to raise them in whatever way they feel most able. Yellow Submarine hopes that the majority of concerns can be dealt with by approaching the senior management team and detailing these concerns. However, it is recognised that this is not always possible, particularly if the concerns relate to the management of the organisation, the managers themselves, Yellow Submarine employees, or other sensitive issues, such as the individual's concerns for their own employment, the service or other issue.

Whistleblowers will not be prejudiced by raising concerns – their concerns, if made with genuine motivation and concern, will be addressed with the highest importance and regard.

Regarding Safeguarding concerns, it is the duty of everyone in the organisation to pass on any concerns or allegations of vulnerable adult or child abuse without delay. All concerns should be referred to the Safeguarding Lead. That person will then follow Yellow Submarine's Safeguarding Policy.

Any whistleblower disclosing information in good faith will be protected if he/she has a reasonable suspicion of abuse.

The following bodies/people can be approached, if the individual feels that it is not possible to address concerns with Yellow Submarine management/ the organisation directly:

Yellow Submarine Chair of Trustees: 01865 236119 / chair@yellowsubmarine.org.uk or in writing to Chair of trustees, Yellow Submarine, 12 Park End Street, Oxford OX1 1HH.
A member of the trustee board also acts as the Deputy Safeguarding Lead and should be contacted via the chair if it is not appropriate to speak to the safeguarding lead about a concern.

To report any safeguarding concerns about a professional or person in a position of trust:

Please contact the Local Authority Designated Officer (LADO); to report an allegation the LADO Team are available on 01865 810603 or email lado.safeguardingchildren@oxfordshire.gov.uk

For further information about reporting concerns see:

Reporting a concern about a child or young person – [Oxfordshire Safeguarding Children Partnership \(OSCP\)](#)

Reporting a concern about an adult – [Oxfordshire Safeguarding Adults Board](#)



See safeguarding policy for further guidance.

To report concerns about the organisation and its management: Concerns about the charity and its management can be reported to the [Charity Commission](#) (the regulatory body for charities in England and Wales).

To raise a complaint about a charity, see – [Charity Commission - Complaints](#)

Report a serious incident: For information and advice see –

- Members of the public can share details of serious incidents here – [raising concerns about a charity](#)
- Staff and volunteers can also use the following email address to raise a concern - whistleblowing@charitycommission.gov.uk; details of what information to include can be found here – [gov uk – raising concerns about a charity](#)
- Trustees should adhere to the following advice and procedure should they need to report a serious incident or share a concern – [gov uk – raising concerns as a trustee](#).

Policy Reviewed by: Kate Sankey
Date Reviewed: 13th February 2025
Next Review: February 2026



Index Appendix I: Risk Assessment

Management of Health and Safety at Work Regulations Risk Assessment Record

What are the hazards?	Who might be harmed and how?	Procedures in place to reduce risk	Is there more we can do to manage this risk?	Action by whom?	Action by when?	Done

Name of Assessor	Date (to be reviewed annually)



Glossary:

AL - YS staff responsible for running the activity day

YP - Young person/people, aged 11 – 18

Safeguarding Lead - Kate Sankey

YS - Yellow Submarine Charity

YS Staff - Staff employed on a full/part time paid basis. These staff members have received generalist/specialist safeguarding training, First Aid and Medication Awareness training. They all have full DBS clearance. *This term also encompasses sessional staff, unless the term 'full time' precedes it.*

Vol/s - persons who give their time voluntarily to YS, who have undergone the Yellow Submarine recruitment process



Index Appendix II: Accident Form(s)

Name and role of person completing this form:
Signature of person completing this form:
Date:

Details of Accident – Please give as much relevant information as possible

Date and time of accident:
Session/Activity:
Place of accident:
Name/s of person/s involved in the incident (e.g. Member, staff, volunteer):
Description of the event (what happened):
Witnesses (include contact details):
What happened next (e.g. First Aid given, actions taken to minimize further risk):



Recording & reporting the accident

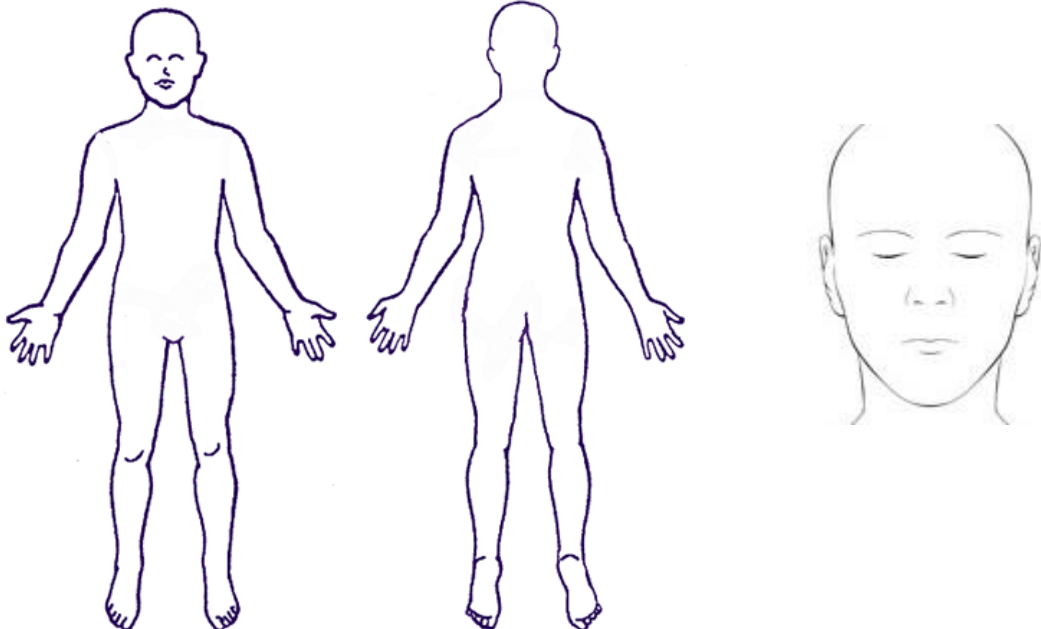
☐ Check the box to confirm parents/carers have been informed.	Date:
How? ☐ In person ☐ By Telephone ☐ Handover Form ☐ Email	
☐ Check the box to confirm Yellow Submarine senior management have been informed. Please do this as soon as possible.	Date:
Reported to:	
How? ☐ In person ☐ By Telephone ☐ Handover Form ☐ Email	
☐ Check the box to confirm the accident has been logged.	Date:
Accident Log: http://my.hdle.it/31735546	

Steps post-accident

Any follow up actions required (e.g. any safety measures put in place, equipment replaced):
To be completed by:
By when - Date:



Accident & Incident Handover Form For Parents & Carers

Name of Member		Date	
Person writing report & Role		Time	
Description of Accident/Incident			
What action was taken and by whom? Including details of any First Aid given.			
Mark any injuries on diagram			
			
Signature of staff member		Date	
☐ Check the box to confirm the accident has been logged & a copy taken of this form.			
Please do let us know if you have any questions about this incident, we'd be more than happy to discuss what happened further.			
Call – (Activity Leader) on: Or call the Yellow Submarine office on 01865 236119			



Index Appendix III: Incident Form

Name and role of person completing this form:
Signature of person completing this form:
Date:

Details of Incident – Please give as much relevant information as possible

Date and time of incident:
Session/Activity:
Place of incident:
Name/s of person/s involved in the incident (e.g. Member, staff, volunteer):
Please describe anything that happened prior to the incident which <u>may</u> have led to the incident:
Description of the event (what happened):
Witnesses (include contact details):
What happened next (e.g. How the situation was resolved or left etc.):

Recording & reporting the incident



☐ Check the box to confirm parents/carers have been informed.	Date:
How? ☐ In person ☐ By Telephone ☐ Handover Form ☐ Email	
If parents & carers have not been informed, is there a reason why not?	
☐ Check the box to confirm Yellow Submarine senior management have been informed. Please do this as soon as possible.	Date:
Reported to:	
How? ☐ In person ☐ By Telephone ☐ Handover Form ☐ Email	
☐ Check the box to confirm that all members, staff and volunteers involved were given support and opportunity to debrief after the incident, and note below in the follow up section any outstanding issues.	
☐ Check the box to confirm the incident has been logged.	Date: Incident Log: or ask the safeguarding lead to log the report as safeguarding concern

Steps post-incident

Any follow up actions required (this could include making a Safeguarding referral to Safeguarding Lead, passing on to your line manager, talking with parents/carers etc. If unsure, take advice from your Line Manager):		
Action	To be completed by:	By when - Date: