

## Policy Handbook – V2

# Introduction

Those who work for No Limits Development make it what it is. For this reason, we seek to create an environment in which all staff are acknowledged as well qualified, professionally engaged and committed to high quality and standards. We want everyone, regardless of the basis on which they work for us to be able to contribute to their full potential. To this end we seek to ensure that we create a great working environment and ensure opportunities they need for professional and personal development.

This handbook should be read in conjunction with the No Limits Development Instructor Handbook and Safety Policy.

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# 1 - Child Protection

We wish to ensure that all young people taking part in activities can do so protected and kept safe from harm while they are with our staff. It is therefore important that all staff have a clear understanding of how they should operate within an appropriate code of ethics as well as what their 'duty of care' is and how this relates to their position in providing activities. DBS checks will be carried out and references taken for all members of staff who come into contact with children before they are allowed to work with them.

### Definitions

This document applies to children and young people below the age of eighteen. The terms 'children' and "young people" will be used throughout the policy to apply to individuals below the age of eighteen.

### What is Child Abuse?

It is generally acknowledged that there are four main types of abuse: Physical, Sexual, Emotional and Neglect.

- 1. Physical Abuse**  
Is what the term implies – hurting or injuring a child by hitting, shaking, squeezing, burning or biting them. In adventure activities this might result if the nature or intensity of instruction is inappropriate for the capacity of the participant. Bullying is likely to come into this category.
- 2. Peer on peer abuse**  
This could be an adult (instructor/leader) who pushes too hard and adopts a 'win-at-all-cost' philosophy; who attempt to assert unacceptable behavior on students to make them unwelcome or make them do an activity they do not want to do. Bullying can also occur between young people.
- 3. Sexual Abuse**  
Where young people are used by adults to meet their own sexual needs. It could range from sexually suggestive comments to full intercourse and includes the use of pornographic material.
- 4. Emotional Abuse (Including wellbeing and mental health)**  
This would occur when a child is not given support, help and encouragement and is constantly derided or ridiculed. It can also occur if a child is overprotected. Abuse can occur where an instructor/leader has unrealistic expectations over what a child can achieve.
- 5. Neglect**  
Failing to meet children's basic needs such as food, warmth, adequate clothing and medical attention or constantly leaving them alone. It could also mean failing to ensure they are safe or exposing them to harm or injury.

### Indications of Child Abuse

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There are physical and behavioral signs that might raise an instructor's concern about the welfare or safety of a Student. They are only indicators – not confirmation. Some examples are where the student:

- Says that they are being abused, or another person says they believe (or actually know) that abuse is occurring
- Has an injury for which the explanation seems inconsistent
- Behavior changes, either over time or suddenly, becoming aggressive, withdrawn or unhappy
- Appears not to trust adults
- Shows inappropriate sexual awareness for their age and sometimes behaves in a sexually explicit way
- Becomes increasingly neglected

Please bear in mind children that have physical disabilities or learning difficulties are particularly vulnerable and may have problems communicating what is happening to them.

### Safeguarding officer

No Limits Development have a designated Safeguarding officer, their contact details are as follows:

- **Matt Simmon**
  - Telephone – 077365 18427
  - Email – [matt@nolimitsdevelopment.co.uk](mailto:matt@nolimitsdevelopment.co.uk)

Matt should be contacted if you have any concerns regarding the welfare of a child or young person or have any concerns regarding poor practice as per the guidance outlined in this policy.

### Recruitment and Selection

It is important that all reasonable steps are taken to prevent unsuitable people from working with children. This applies equally to permanent and freelance staff, both full and part time. To ensure unsuitable people are prevented from working with children the following steps should be taken when recruiting.

- All staff should complete an application form. The application form will elicit information about the applicants past and a self-disclosure about any criminal record.
- Consent should be obtained from the applicant to seek information from the Disclosure and Barring Service (DBS).
- Two confidential references, including one regarding previous work with children should be obtained.
- Evidence of identity (passport or driving license with photo), will be seen and kept on record.

### Interview and Induction

All employees will be required to undertake an interview carried out to acceptable protocol and recommendations. All employees and volunteers should receive formal or informal induction during which:

- A check should be made that the application form has been completed in full, including sections on criminal records and self-disclosures

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- Their qualifications should be substantiated
- The job requirements and responsibilities should be clarified
- They should sign up to the organization's operating policies and procedures and Codes of conduct
- Child Protection Procedures are explained and training needs identified e.g. basic child protection awareness

### Training

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff:

- Analyze their own practice against what is deemed good practice, and to ensure their practice is likely to protect them from false allegations
- Recognize their responsibilities and know how to report any concerns about suspected poor practice and/or abuse
- Respond to concerns expressed by a child
- Work safely and effectively with children

No Limits Development requires:

- All staff who have access to children to undergo an enhanced DBS check
- All permanent staff to undertake relevant child protection training or undertake a form of home study, to ensure their practice is exemplary and to facilitate the development of positive culture towards good practice and child protection
- All staff to receive and read advisory information outlining good/bad practice and informing them what to do if they have concerns about the behavior of an adult towards a young person
- All staff involved in instructing to have an up to date first aid qualification

### Good Practice

All staff should adhere to the following principles and action:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Make the experience fun and enjoyable: promote fairness, confront and deal with bullying
- Treat all young people equally and with respect and dignity
- Always put the welfare of the young person first
- Maintain a safe and appropriate distance (e.g. it is not appropriate for staff to have an intimate relationship with a child or to share a room with them)
- Avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly and with the consent of the young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the young person's consent has been given
- If groups have to be supervised changing always ensure instructors work in pairs
- Ensure that if mixed teams are taken away, they should where possible always be accompanied by male and female members of staff

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- Ensure that at away events adults should not enter a young person's room/tent or invite young people to their rooms/tents
- Be an excellent role model, this includes not smoking or drinking alcohol in around young people
- Always give enthusiastic and constructive feedback rather than negative criticism
- Prior to a programme planning staff should secure written parental consent for the staff to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises
- Keep a written record of any injury that occurs, along with details of any treatment given

### Poor Practice

The following are regarded as poor practice and must be avoided by all staff:

- Unnecessarily spending excessive amounts of time alone with young people away from others
- Taking young people alone in a car on journeys, however short
- Taking young people to your home where they will be alone with you
- Sharing a room with a young person
- Engaging in rough, physical or sexually provocative games, including horseplay
- Allow or engage in inappropriate touching of any form
- Allowing young people to use inappropriate language unchallenged
- Making sexually suggestive comments to a young person, even in fun
- Reducing a young person to tears as a form of control
- Allow allegations made by a young person to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature that the young person can do for themselves

When a case arises where it is impractical/impossible to avoid certain situation e.g. transporting a young person alone in your car, the task should only be carried out with the full understanding and consent of the parent/carer and the young person involved.

### Accidentally hurting a student

If you accidentally hurt a student and they seem distressed in any manner, appear sexually aroused by your actions, or misunderstand something you have said or done, report any such incident to the Course Director. There should be a written statement of the incident and parents, teachers or carers should be informed in person.

### Is touching okay?

If a teaching technique or instruction would benefit from physical contact or support then the Instructor must ask the students permission. It would be useful to take time to explain why and how this is used.

- It should be a last resort and explained fully before touching
- Avoid hugs, cuddles, etc as this can viewed as an indicator

Touching can be okay and appropriate if it is neither intrusive nor disturbing.

### Concerns about the welfare of a child

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Please remember it is not your responsibility to decide whether a Student is being abused but we are asking you to fulfil your legal requirements and act on your concerns. Make a detailed note of what you've heard or seen and don't delay passing on information.

In the event of a situation in which you consider a child is at risk, you should contact the No Limits Development designated Safeguarding officer – Matt Simmon at the earliest opportunity.

In the event Matt Simmon or the Operations team cannot be contacted and you need urgent advice contact the NSPCC Child Protection 24-hour Helpline 0800 800500

If a Student tells you that he or she is being abused

- Stay calm
- Don't promise to keep it to yourself
- Listen to what he or she says and take it seriously
- Only ask questions if you need to identify what the child is telling you, do not ask about explicit details
- Make a detailed note of what the child has told you but, don't delay passing on the information

### Use of Photographic/Filming Equipment

The use of mobile phones to take pictures and video, and subsequently share them almost instantly has rapidly increased within the last 5 years. This can form a positive contribution to course but can also have negative effects in abused.

There have been a number of cases where children have been placed at risk as a result of the ability to discreetly record and transit images through mobile phones. There is also scope for humiliation and embarrassment if films or images are shared on popular websites such as YouTube. The use of mobile phones in this way can be very difficult to monitor.

The Media Policy, including the for the use of Photographs, Film and Video should be observed in relation to the use of mobile phones as cameras/videos. Particular care is required in areas where personal privacy is important e.g. changing rooms, bathrooms and sleeping quarters. No photographs or video footage should ever be permitted in such areas of personal privacy.

All staff should be vigilant. In-appropriate use should be challenged and any concerns should be reported to the safeguarding officer.

### What you should do as an Instructor if you have allegations made against you.

If you as a Leader or Instructor have had allegations made against you, you need to report this to the Course Director immediately. The teacher or assistant leader should take control of the group, and activities should be suspended. The Student making the allegations must be placed into the direct care of a teacher or adult not directly involved with the group. There should be an initial conversation with the child protection officer and if necessary and brief investigation into the allegation and this may be made

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by the Course Director with guidance for the child protection officer and a written report produced. The No Limits Development Safeguarding Officer, and if deemed necessary the police and child protection officer in the area in which you are working must be informed.

### Disclosure of Information

If a child discloses information about abuse, whether concerning themselves or a third party then the child should be informed that the information will be shared with the relevant authorities (school staff or Social Services if appropriate). This should be done with the agreement of the child.

If working in a school environment with school staff, responsibility of handling information should be passed to the school child protection representative. In all cases the No Limits child protection officer should be informed.

Information should only be shared with people directly involved with the child or people within the reporting procedure. Following such an incident it may be necessary for the staff involved to receive counselling.

## 2 - UV Protection Policy

### Briefing

All participants should be briefed on the harmful effects of UV Radiation and will be encouraged to cover up using sun hats, long sleeve shirts and trousers.

### Protection

Whenever possible instructors will take advantage of natural shade, such as trees etc, whilst carrying out activities and briefings. All participants will be asked to bring their own sun cream during summer months and this will be included in the kit list which is part of the pre course information sent to schools. We will have access to hypoallergenic sun spray/ cream of at least factor 15 if some participants have not brought their own.

### Sun Screen Application

Instructors should brief all participants on the safest way of applying sun cream especially around the eyes, mouth and nose. When supervising the application of sun cream, you should conduct yourself in accordance with our child protection policy.

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### 3 - First Aid

**Appointed First Aid Advisor:** Matt Simmon

#### Provision of First Aiders and Equipment

For each course running the No Limits Development operations team will consider the following to assess the level of first aid cover required.

- Activities being undertaken and their associated risk
- The facility being used e.g. camping
- Specific participant needs such as previous conditions and age
- Risks of areas being visited (e.g. remote areas or extreme temperature)

This list is not exhaustive and is directly linked to No Limits Development Risk Assessments. This should also be a dynamic process that is constantly monitored by Course Staff.

#### Responsibility

It is the responsibility of the No Limits Development Operations team to ensure:

- There is an adequate number of first aiders staffed for all courses
- There is an adequate number of appropriate first aid kits provided to the course
- Where participant information is known this is passed to the Course Staff

It is the responsibility of all No Limits Development Instructors to ensure:

- Appropriate No Limits Development first aid kits are carried on all activity's
- That first aid is carried out in accordance to their training and experience.
- That they should monitor the provision of first aid staff and facility's and raise any concerns
- Highlight at the beginning of a course to the participants the location of the first aiders and first aid kits

#### Incident Process

No Limits Development has a separate in depth incident process for dealing with a wide array of incident.

#### Infection Control

- Single use medical gloves must be used for all first aid
- All medical waste must be disposed of in medical waste bags in the central first aid kit (in the short term the inside of a medical glove may be used)
- All medical waste bags must be sealed at the end of the course and given to the person collecting the first aid kits.
- All body fluid spill should be cleaned up appropriately

#### Lone Working

- Ideally when first aid is being carried out there should be a second adult or first aider present
- Where this is not possible first aiders should ensure there are other people around and that they in an open area



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- First Aiders should keep a constant dialogue with patients to ensure they understand what is going on.

### Recording of Accident's and First Aid

- All accident and incident's requiring first aid must be recorded using an incident report form and highlighted to the course director.
- Course directors must report any serious incidents or any incident requiring a visit to hospital to a member of the operations team
- Where the injury is significant that RIDDOR must be informed this will be handled by Tony Ward or the Operations team

### First Aid Kits

- Small - Designed for an instructor to carry while on an activity with a singular group or Appropriate for a remotely supervised DofE Group to care for themselves whilst waiting for a first aider
- Medium- Designed for larger activities and groups that are not tied to one location i.e. DofE Expeditions
- Large - Designed for a central location and also for topping up of smaller first aid kits

In addition to these kits there will be the following additional supplies where required:

- Foil Blanket
- Emergency Shelter
- Bivi Bags
- Sun Cream

### Review

This policy is a dynamic working document under constant review. A formal review of the policy will be undertaken on an annual basis.

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# 4 - Data Protection Policy

### Aim

No Limits development is committed to keeping the personal information provided to us confidential and secure, in accordance to the data protection act.

The Data Protection Act 1998 contains 8 principles:

- Personal data should be processed fairly and lawfully
- Data should be obtained only for one or more specified and lawful purposes
- The data should be adequate, relevant and not excessive
- It should be accurate and where necessary kept up to date
- Any data should not be kept for longer than necessary
- Personal data should be processed in accordance with the individuals rights under the act
- Data should be kept secure
- Personal data should not be transferred outside the European Economic Area unless the country offers adequate data protection.

### What information do we hold and how do we care for it?

#### Participant Information

No Limits collect participant information through consent forms and teacher/ parent/ carer disclosures to allow us to ensure our programmes meet participants welfare needs. No Limits is required to keep this information on file after courses for review in the case of an incident or investigation by an external authority. This information is confidential and kept in secure storage either in paper format or on a secure encrypted cloud server, and will not be disclosed to an external organizations unless the participant is notified.

#### Client Information

No Limits keeps records of client information including contact details to allow us to keep you informed with the course you are booking and future courses that may be of interest. This information is used by our account managers and operations team but will not be shared with external organizations. This information is kept on our secure operation system hosted on an encrypted cloud server.

#### Financial Information

No Limits receives financial information by way of invoices submitted to us from service providers and instructional staff. This information is either keep on secure laptops using an encrypted cloud server, or in secure storage within either of our 2 offices. This information is accessed by the No Limits full time team, but also by our accountants by way of monthly financial reviews.

### How do we store and access information?

Where information is digital, No Limits uses a mix of technology to store and access the information above. We use 2 cloud based servers, both selected with security in mind. Each cloud has password

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secured individual access accounts monitored by Managing Director Tony Ward, all information stored on both systems is fully encrypted and security externally reviewed. All devices with access to this are password secured with personal passwords and user names. Where information is in paper format it will only be stored in our head office in Ambleside or our Operations office in Buxton. Both offices have secure document storage and are always manned by one of our full time team.

### GDPR

No Limits Development has a full GDPR Analysis available with details on what we store, how we store it, and under what authority

### Drugs Policy

This policy is designed for all staff, teachers and young people, and aims to provide a structure of procedures that can be followed if drug abuse is suspected or is discovered.

#### Definitions of Drug Abuse

Drug abuse is the taking of any non-prescribed drug or substances.

#### Procedures

- If a staff member suspects or has evidence of drug abuse during an activity, then that activity should be stopped and the group should be contained until the issue can be dealt with effectively.
- When there is a drug related issue, staff should contain the situation in such a way that other people or properties are not put at risk.
- On discovering a drug related issue staff must inform their immediate manager and a member of school staff.
- At no time is a member of Staff to search individuals or their personal belongings.
- If illegal substances are found to be present, under no circumstances should a staff member confiscate or take possession of these items.
- Anyone found or suspected of taking or administering illegal substances will usually be asked to leave whatever programme they are involved in.
- Anyone that is asked to leave the programme must be fully supervised until they are taken home or placed in the care of a parent or guardian.

#### Reporting

After such an issue a written report must be submitted.

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# 5 - Catering Policy

### What do we do?

No Limits occasionally caters for staff and students as part of its outdoor courses, this generally falls into two styles of catering:

#### Outside Catering

This is where the course is camping based, and we would set up our own catering facility inside a tent.

#### Inside Catering

This involves No Limits staff using a catering facility provided by a third party, this is generally part of a full venue hired for the course.

No Limits realises that catering with staff who have minimal catering training in catering presents a risk and has created this document to ensure we have identified the risks and are providing suitable guidance to our staff. This document has been written with guidance from the FSA "Safer Foods for Business" pack

### Process

No Limits have worked through the FSA "Safer Foods for Business" pack considering each section as we go through and applying it to our particular circumstances. We have kept this document as a reference and reproduced the Safe Method Tables with our own specific guidance in the "how to" part. These tables will be shared with all staff and displayed in all catering areas. We will also aim to create some supporting posters including hand washing and a kitchen lay out guide

**Training** - All staff catering on courses must read this document and the No Limits safer methods summary as a minimum to ensure they are aware of our safe working practices and how to follow them. This ensure they are aware of the safety measures we have in place. This will be recorded on our instructor database.

No Limits will endeavor to offer an external training course to all staff

### Supporting Documents

The following documents support this policy and its implementation on courses

- Food Safety Log – To be completed on all catered courses
- Catering Policy (Safer Methods) – This is based on the training supplied by the FSA and outlines our safe working practices for all elements of catering
- Safer Food for Business – This is the guidance document used to produce our policy, it provides a greater level of detail that whilst useful is not vital for all staff members to read
- Catering Policy (Key Points) this is a summary document of our safe working methods and is vital for all staff to be aware of, particularly those catering on courses

### Review

We will review this document at the end of the operational year, and make changes based on feedback and experience, we will make interim changes throughout the year if required

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# 6 - Food Allergen Policy

No Limits Development are committed to ensuring that where we provide food on our courses, we endeavor to cater to everyone's dietary needs. This policy lays out the steps we put in place to try and make it safe for all consumers including those who may have food allergies.

### Step 1 - Pre Course Communication

Before all courses we provide the client with a Participant Consent Form - this provides the opportunity for participants and accompanying staff to disclose any dietary requirements. Where dietary requirements are raised, we ask the client to inform us as soon as possible, with as much information as possible (severity, allergen, treatment, care plans etc.) to allow us to adapt our catering plans appropriately.

### Step 2 – Pre Course Planning

The planning of menus and shopping is done by our operations team before courses. This gives us the ability to adapt our menu and shopping lists to match any requirements given to us in step 1. Where there is a lack of clarity in the dietary requirement, the operations team should come back to the client to discuss in further details what needs to be put in place to meet the participants needs. All information received from the client will be passed onto the delivery team of the course.

### Step 3 – Food Preparation on Courses

During the initial course briefing with the NLD delivery team and teaching staff, dietary requirements will be reviewed and discussed in further detail. Due to the nature of our courses and the fact that our shopping is done online, there is always the risk of the introduction of food not intended for the course either by other site users, or by supermarket replacements. The NLD delivery team and school staff, should conduct a double check before any food or ingredient is introduced into a meal.

### Step 4 – Food Service

This is the final point to identify contaminants, and is the responsibility of the server, the staff team and most importantly the person with the allergen. The person in question should raise their allergy to confirm that the food they are being served is suitable, and the person serving the meal should have the knowledge to confirm whether it is indeed allergen free.

### Other risks of contamination

As a lot of our courses are on open sites, and in some instances staff and students bring their own food, No Limits can never go as far as to be "Allergen Free". We can although work to minimise the risk where it is within our control.

The most important element is that there is constant good communication both before and during the course to increase the number of people aware, and therefore allow as many chances as possible to stop the introduction of a specific allergen.

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# 7 - Bullying, Harassment, and Discrimination Policy

### Aims

No Limits Development are committed to creating a safe and happy environment for all its employees and clients. It is therefore our policy to not accept any form of Harassment Bullying or Discrimination

### Definition

The terms bullying and harassment are used interchangeably by most people, and many definitions include bullying as a form of harassment.

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.

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

Harassment and Bullying may be summarised as any behaviour that is unwanted by the person to whom it is directed. It is the impact of the behaviour rather than the intent of the perpetrator that is the determinant as to whether harassment or bullying has occurred.

Bullying or harassment may be by an individual against an individual (perhaps by someone in a position of authority such as a manager or supervisor) or involve groups of people. It may be obvious or it may be insidious. Whatever form it takes, it is unwarranted and unwelcome to the individual and will not be accepted by No Limits Development.

No Limits Development's policy applies to all staff working within the organization and to all employees working off the premises. It extends to include non-permanent workers such as freelance instructors, temporary staff, consultants and any other workers. The policy, in addition, covers the behavior of staff outside working hours which may impact upon work or working relationships.

No Limits Development has a "zero tolerance" policy and will investigate vigorously any allegations of bullying or harassment, regardless of whether the matter has been raised formally or informally.

### Harassment

Harassment is related to a relevant protected characteristic. The relevant protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation.

### Bullying

Bullying includes but is not limited to:

- Conduct which is intimidating, physically abusive or threatening

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- Conduct that denigrates, ridicules or humiliates an individual, especially in front of colleagues
- Humiliating an individual in front of colleagues
- Picking on one person when there is a common problem
- Shouting at an individual to get things done
- Consistently undermining someone and their ability to do the job
- Setting unrealistic targets or excessive workloads
- "cyber bullying" i.e. bullying via e-mail.
- Setting an individual up to fail e.g. by giving inadequate instructions or unreasonable deadlines.

### Complaints Procedure

Anyone who feels they or someone else are a victim of bullying or harassment should primarily approach the course director or a member of the operations team provided they feel able to do so. In the first instance we will try to deal with it informally by mediation however if deemed necessary we will refer to the grievance and disciplinary process

When a complaint of Harassment or Bullying is brought to the attention of a manager at any level, whether informally or formally, prompt action must be taken to investigate the matter. Corrective action must be taken where appropriate and this may require an investigation under No Limits Development's Disciplinary Policy and Procedure.

All matters relating to the investigation of complaints of harassment or bullying will be treated in strict confidence. Any breach of confidentiality in this regard may render those responsible liable to disciplinary actions. However, it will be necessary that any alleged perpetrator is made aware of the allegations against them and the name(s) of those making the allegations together with the name(s) of any witnesses.

No employee will be victimised or suffer detriment for making a complaint of harassment or bullying and no manager shall threaten either explicitly or implicitly that an employee's complaint will be used as the basis for decisions affecting that employee. Such conduct will be treated as a very serious disciplinary offence. Similarly, managers are required to act on any complaint of harassment or bullying. Failure to do so will be regarded as misconduct which if proven, will result in disciplinary action.

All complaints of harassment or bullying whether raised formally or informally must be notified by the recipient of the complaint to the No Limits Development Operations team for recording in accordance with the requirements of the Equality and Human Rights legislation. This legislation requires such records to be maintained and the incidence of bullying and harassment to be monitored.

This policy and procedure will be reviewed periodically giving due consideration to legislative changes.

### Informal Resolution

Complainants are encouraged to try, if they feel able to do so, to resolve the problem informally by making it clear to the alleged harasser that his/her actions are unwanted and should not be repeated.

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This may be done verbally or in writing in which case the complainant should keep a copy of the documentation and, where possible, the times and dates of incidents should be recorded.

If the complainant feels unable to approach the alleged harasser, a work colleague could be asked to speak to the alleged harasser on the complainant's behalf. A note should be made of the action taken and the matter notified to No Limits Development operations.

An individual who is made aware that their behavior is unacceptable should:-

- Listen carefully to the complaints and the particular concerns raised;
- Respect the other person's point of view: everyone has a right to work in an environment free from harassment/intimidation;
- Understand and acknowledge that it is the other person's reaction/perception to another's behaviour that is important;
- Agree the aspects of behaviour that will change;
- Review their general conduct/behaviour at work and with workplace colleagues.

### Formal Resolution

If the alleged harassment continues, the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally with the No Limits Development Ltd.

Normally, this will be via the Course Director or line Manager. However, if the employee feels unable to do this they should submit the complaint in writing to the Operations team. In exceptional circumstances, allegations may be raised directly with the relevant Director, who will with other appropriate managers, arrange for the matter to be progressed in accordance with this policy and procedure.

When dealing with a complaint of harassment under the Formal Resolution Procedure, the relevant manager should:

- Take full details of the incidents in writing from the complainant and their representative (if appropriate);
- Take full details from any witnesses/other complainants who come forward and may have witnessed the alleged behaviour
- Inform the alleged harasser of the complaints against him/her, advise the alleged harasser to seek representation and invite him/her to a meeting in order that they can comment on the allegations against them.
- Keep all parties informed of expected timescales.
- Inform all parties in writing of the outcome and any action that may be required.

If the allegations and the working situation warrant it, the alleged harasser may be suspended during the investigation (in accordance with established disciplinary procedure) or transferred temporarily pending the outcome of the inquiry to another Department.



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Should there be a case to answer against the alleged harasser; the manager who has dealt with the complaint will communicate this to an impartial manager who will conduct a separate disciplinary investigation. The normal disciplinary procedure for misconduct/gross misconduct should then be followed. However, the following points should be taken into account:-

- The complainant will normally be required to attend the disciplinary hearing as a witness, unless there are exceptional circumstances which prevent them from doing so;
- If the complainant is required to attend, they are entitled to be accompanied by either a Trade Union representative or work colleague and have any questions directed through that person.

If the complaint is upheld at the disciplinary stage, there are a number of possible outcomes for the harasser, depending on the evidence presented and the circumstances. These could include, but are not limited to:-

- Dismissal
- A formal warning
- A recommendation of redeployment of the harasser, either on a temporary or a permanent basis. This will not be on any less favourable terms and conditions of employment.
- Implementation of other sanctions as detailed in No Limits Development's Disciplinary Policy.
- Making arrangements for both parties to work as separately as possible within the same workplace.

In addition to the above, the harasser may be required to attend any training courses as deemed necessary by No Limits Development.

With any allegation, the need for a thorough and objective investigation is paramount. Consequently, if through the course of the investigation evidence demonstrates that the allegation has been made frivolously, maliciously, or for personal gain, then the individual making the complaint will be subject to Disciplinary proceedings as outlined in No Limits Development's Disciplinary Policy.

### Appeals

Appeals against decisions taken under the Bullying and Harassment Policy and Procedure shall be dealt with as follows:

- Appeals against a disciplinary sanction will be dealt with in accordance with the appeals process in the Disciplinary Procedure.
- Appeals by a complainant about the outcome of any inquiry will be dealt with in accordance with the appeal process in the Grievance Policy.

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# 8 - Customer Service Standards

### Introduction

These customer care standards describe how No Limits Development will relate to its clients in delivering high quality customer care. This Policy will sit alongside the Instructors handbook, and policies outlined in the Safety Policy, and policies and Procedures Handbook in setting the standards and values across the company.

In providing good customer care we undertake to know how to deal effectively with our customers in all circumstances and to manage their communication, expectation and perception.

No Limits Development is committed to providing a service that will meet our individual client needs.

### Customer Care Values

- No Limits Development will deal with enquiries and service requests promptly, efficiently and courteously.
- We aim for first time resolution of any queries raised however if this is not possible will put customers in contact with the right person.
- We will publish clear and helpful information about the services we provide.
- We will respond to service issues and complaints fully and transparently.
- We provide a safe and secure environment.
- We regularly seek and act upon feedback from our clients and participants on our programmes..
- We will take ownership of all we say and do in No Limits Development's name.

### Guiding Principles

Our guiding principles are based on the following:

- That we are honest and accountable
- Our staff will keep to the policies that effect customer care and will consider customer's needs when providing information.
- We will respond to customers in a professional way.
- We will continuously improve our customer care standards by actively seeking feedback on ways we can raise our standards.
- We will carry out surveys regarding customer needs and will make it easy for our customers to express an opinion.
- We have a complaints, comments and compliments policy that is fair and easy to understand.
- Our staff aim to always give a positive first time response. We will not 'dead-end' customers but rather provide solutions, options, or alternatives.
- If an issue is not within a person's job scope it will be fast tracked to the right member of staff and feedback provided to the customer that this is what we have done.
- We will provide customers with a realistic expectation of what we can deliver and will always try to exceed their expectations.
- We will be up front and open and avoid using jargon in all our letters, e-mails and faxes

### Complaints Procedure

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We intend to get things right first time but sometimes this does not happen and things go wrong or we could have done things better. We take complaints very seriously and adopt a positive attitude as they can improve the service where we know there is a need.

A complaint can be an expression of dissatisfaction with the service you are receiving such as:

- The standard of service received
  - What we have done or failed to do
  - The way in which we have done something
  - The way in which our staff have behaved
1. All complaints are handled by our Operations Team who will aim to resolve a complaint within 10 working days of receipt.
  2. If a full response cannot be issued within that time period, the complaint is acknowledged in writing to the complainant, who is informed that it is receiving attention.
  3. If the complaint cannot be resolved within 10 working days from receipt a further letter is issued, advising of the progress. However, it is our target to resolve all complaints within this timescale.
  4. Complaints are analysed and reviewed regularly, which enables corrective and preventative action to be taken, securing continuous improvement wherever possible.
  5. If after investigation we find we have made a mistake we will:
  6. Write to the complainant and fully explain our actions.
  7. Take responsibility for the mistake and apologise.
  8. Learn from the mistake and implement change to address the matter.
  9. We may not always agree with a customer's comments or complaint but will always seek to provide a fair and suitable response.

## 9 - Fair Pricing

No Limits Development are committed to providing fair and competitively priced product to our client's. Due to the nature of our courses and client relationships, most of our programmes are bespoke, and therefore individually priced. We believe that long term business relationships are built on trust. It is our policy to be honest and open, providing our customers with quality services at a fair price, whilst also ensuring the sustainability of our business.

No Limits Development commits to the following principles when pricing its programmes:

- Where a price is advertised, as "from £" further information will be given for these prices, such as a set number of students. Where the price differs from this, we will explain the reason for the difference.
- When designing and pricing a programme we will work with our customer to create bespoke solutions to fit both their needs and budgets.
- We will confirm the price agreed in writing once a programme has been decided

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# 10 - Media Policy

No Limits Development is committed to engaging with a variety of audiences through the use of a range of media, but recognizes that this can have positive and negative effects, and should therefore be treated with care and understanding. Photos and video clips can be used to celebrate achievements, and to promote activities. The aim of these guidelines is not to curb such activity but to ensure that children are protected from those who would seek to take or manipulate photos and video footage in a way that harms children or places them at risk of harm.

Some activities take place in areas where No Limits Development have little or no control over the environment such as open-river or areas to which the public have general rights of access e.g. the open countryside. In these circumstances, staff should take all reasonable steps to promote the safe use of photographing and filming and to respond to any concerns raised.

### Permission

As part of our Standard Consent form Parents or Guardians are asked to give permission "for any photographs taken to be used for display or publicity purposes? Where any photos or videos are going to be taken it is important that the person responsible for taking the images has checked the consent form with the lead teacher.

Where we are aware in advance of the intended use of the photos, e.g. a media post, this intention should be shared with the lead teacher.

Where photos or videos are to be captured for any use outside of No Limits Development (e.g. third-party providers) permission for this must be sought from the parents or guardians of any person whose image is captured.

It is also of the utmost importance that the persons being pictured, are aware of what and why you are taking the picture or video and are happy to do be involved. Whilst permission may have been given by a parent or guardian, if a person is uncomfortable or would prefer not to be included this must be respected.

### Capturing Images and Video

Images and Video may only be captured under standard consent by persons employed (either formally or on a freelance basis) by No Limits Development. Whilst ideally this would be on a device owned by No Limits Development, by the nature of our remote activity, this is often impracticable, and it is therefore allowable to use a personal device, provided the following steps are followed:

- Images taken have the consent of the lead teacher and the persons being photographed or videoed

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- Images are taken on a device and passed to an appropriate member of the full-time team for storage
- Once images or videos have been passed on, they should be deleted from the personal device

Where images are not of any people, it may be appropriate for staff to keep the images personally, this should be discussed with the Course Director.

### Storage and use of Images and Information

No Limits Development will ensure that all copies of videos and digital photograph files are stored in a secure place, in line with its GDPR Policy.

Usage of images and videos, must be approved by a member of the operations teams, who should ensure the usage is appropriate and in the best interest of No Limits, and the persons included within the image.

### Concerns

Anyone behaving in a way which could reasonably be viewed as inappropriate in relation to filming or photographing should be reported to the person in charge on the day. They should be approached for an explanation. If a satisfactory explanation is not provided, the circumstances should be reported to the person in charge on the day or the No Limits Development Safeguarding Officer. Where appropriate concerns should also be reported to the police.

## 11 - Environmental Policy

No Limits Development understands that whilst its aims and activities embrace the environment, its activities will take their toll and have an impact on the world around. As a responsible company, and in keeping with its moral values, we aim to lessen our environmental impact where we can.

The following steps are taken within No Limits to lessen its impact, but is by no means exhaustive:

- Where we have to use transport as part of our courses, we try to minimize the number of journeys by using larger more economical vehicles where possible
- In our head office we aim to separate and dispose of waste appropriately according to local recycling facilities
- Where possible our team aims to reduce the travel, it does by:
  - Using IT solutions to reduce the number of unnecessary meetings
  - Where multiple people are going to meetings, we aim to car share
  - Where possible we can eliminate travel by working from home
- Where possible we reduce the printing and posting of information by sharing it digitally

We are always open to new ideas and technology, and this policy will be constantly developing as new ways to be environmentally responsible are discovered.

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# 12 - Inclusion Policy

No Limits Development is committed to ensuring our programmes and the benefits they deliver are accessible to all. We will always strive to adapt our programmes and delivery style to meet any additional need presented to us, and believe that no person should ever be excluded from our programmes based on their background, ability or circumstance.

Where we are presented with any person who may not be able to be fully included in a planned programme, we will speak with the most appropriate person to gain more information about the needs of this person, this could be the persons themselves, a parent/guardian, or a medical professional, pass this information to a member of the operations team, who will then look any adaptations needed. Where required the team will create a person specific risk assessment and discuss this with all the appropriate parties.

# 13 - Lone Working Policy

## Summary

No Limits recognises that due to the nature of our business, lone working is sometime necessary, but should be carefully managed to ensure the safety of all employees. Although there may be exceptions, the two scenarios where No Limits foresee lone working, are solo instructors with small DofE groups, and Operations staff working alone in Head Office

## Lone Working – DofE

Due to the nature of DofE supervision and Assessing, it is not uncommon for instructors to find themselves alone for extended periods of time, this is usually as part of a bigger expedition with a lead instructor or teacher. It is important that the full adult team (teachers, instructors, and assistants) are all aware of each other's contact and the plans for lone working. In these circumstances the following is recommended

- All adults should meet either the evening before or that morning to discuss the days plans, to ensure that no one is out without their plans unknown
- When heading away from the base, be this onto the hill or driving into remote areas, another adult team member (ideally lead instructor or teacher) should be aware of your plan and return time. Upon your return, you should check back in with this person.
- On more complex expedition's where remote working will be for extended times, such as wild camps or remote areas, this process should be given a much larger emphasis including check in times and where possible route outline or overview of plans for the day.

On the rare occasion that instructor's find them entirely alone without another adult in the expedition area, No Limits will provide a duty contact for this purpose, due to the added risk of this contact been out of area, it is critical that the expedition is treated as a remote expedition.

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### Lone Working – Head-Office

It is not uncommon for members of the operations team to find themselves working alone in the office and attached stores, whilst this is not ideal, and where possible should be avoided, it is necessary for the running of the day to day business.

Whilst in the office and stores alone, employees should ensure that another competent adult is aware of your presence there and what time you are expecting to leave, whilst this would ideally be another member of the Ops team, this is not always possible, therefore a competent adult, for example spouse or family member is acceptable.

Whilst lone working in the office and stores, employees should be especially vigilant in thinking about the tasks they are undertaking, and where possible should avoid higher risk tasks, examples of these are using ladders, manoeuvring large objects, and working with flammable materials. Where these are unavoidable, and competent adult should be made aware, and checked in with once the tasks is finished.

## 14 - Equipment Management and Maintenance Policy

***No Limits Development has made a safety commitment to "Ensure all safety critical equipment is used and inspected in line with industry good practice. All equipment is used and maintained as recommended by manufactures. Damaged or broken equipment is repaired or retired as appropriate." This policy defines how this commitment will be fulfilled***

### Safety Equipment Selection and Lifespans

PPE and other safety equipment required by No Limits Development will always be selected by a person with an understanding of the activity and the purpose of the equipment. We will purchase this equipment from reputable suppliers and manufacturers, where required seeking external recommendations from other industry users or experts. No Limits Development follows all manufacturers guidelines in term's of usage, maintenance and lifespans.

### Inspections

Inspection of PPE is carried out by members of the operations team who are deemed competent by the Managing Director and who are familiar with its use operationally. These people are:

	Inspection Areas	Experience
Matt Simmon	Climbing Paddlesport First Aid	2 Day FPE Course (2016) Various Paddlesport NGB First Aid Qualified
Paul Rhodes	Climbing First Aid	SPA Assessed First Aid Qualified

Equipment also undergoes pre use checks by instructors competent to use that equipment (e.g. SPA checking a rope as they set up)

Inspections of equipment are carried out yearly, this is deemed appropriate inline with manufacturers guidance, and the usage equipment receives (generally less than 10 days per year). Inspections are recorded on a central database. Any equipment found to be unsafe will be immediately taken out of service and made unusable (e.g. straps cut)

## 15 – Religious Headwear and Helmet Policy

### Introduction

No Limits Development believes in providing adventures opportunities for all and recognises its duties under the equality act (2010) and its duties in relation to healthy and safety of participants.

Where Helmets are required as part of an activity this is to prevent unnecessary risk of injury to participants in view of the hazards and risks posed by the environment and endeavour being undertaken.

### Approach

Where Headwear is worn for race or religious reasons then the following options enable the use of helmets:

- If the participant feels their headwear can remain under the helmet without impacting the fit or function of the helmet or their headwear than this is acceptable.
- If the participant feels it is appropriate to use the helmet as an alternative head covering, they can be provided a safe and private space to change.
- If the participant is able to wear there headwear over the top of the helmet, without it impacting fit or function, and the helmet is able to be adequately checked by an appropriate instructor in a sensitive and appropriate manner, than this is also acceptable.

Where the above is not an option, then the activities should be risk assessed for the specific group, aims, activity and venue on that day to see what other risk mitigation can be used, or if the activity can be adapted to a level of risk allowing the removal of the need for a helmet to guard against head injury.

Examples of these mitigations are:

- Climbing – Checks to the venue, allocation of safe zones, allowing no one above the climber, belaying away from the climber – all are example measures to reduce the risk of possible rock fall
- Watersports – Choosing a deep water sheltered venue, carrying out low risk activities, staying away from banks and hazards – all measures to reduce the risk of a head injury from a stationary hazard.

Any change to operate in accordance to standard operating procedure must be in consultation with the duty NLD manager, the participant, and their guardian (i.e. group leader or parent).



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# Document History

Reviewed and Approved by Matt Simmon and Tony Ward – July 2023

- Removed the Disciplinary and Grievance Policy from the Policy handbook as this does not apply to freelance delivery staff and is limited to PAYE Employees
- Moved the Lone Working Policy into the Policy Handbook
- We have introduced a new Equipment Management and Maintenance Policy

V2 - Reviewed and Approved by Matt Simmon and Tony Ward – March 2024

- Addition of Religious Headwear and Helmets Policy