

## **Live Life Better Safety & Privacy Statement - March 2020**

Our safety and privacy provisions appear on our website.

Sections within this Statement:-

- 1/. Code of Conduct
- 2/. Health & Safety
- 3/. Staff background check statement
- 4/. Safeguarding
- 5/. Data Protection Policy
- 6/. Staff & Volunteer Confidentiality Policy

### **1/. Code of Conduct for Live Life Better staff and volunteers**

They will:-

- never knowingly demean, undermine or disrespect others.
- never knowingly discriminate on grounds of gender, marital status, religion, belief, colour, race, ethnicity, class, sexual orientation, disability or age.
- always take reasonable, due and pre-emptive care of others.
- co-operate and collaborate where necessary (e.g. with parents/guardians, other agencies etc).
- observe confidentiality in a manner consistent with legal requirements.
- always maintain high standards of professionalism (e.g. honesty and integrity).
- never misuse or misrepresent their position, qualifications and experience or otherwise bring the reputation and standing of Live Life Better into disrepute.

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### **2/. Health & Safety for Live Life Better**

Overall and final responsibility for health and safety & day-to-day responsibility for ensuring it's put into practice:  
Olivia Roe

***Our health and safety policy is a 'Lone Worker policy' (details TBC)***

***All staff and volunteers should:***

- co-operate with others on health and safety matters;
- take reasonable care of their own and others' health and safety
- report all health and safety concerns to an appropriate person ***Arrangements for health and safety:***

***Arrangements for health and safety:***

**Risk assessment:-**

- We will complete relevant risk assessments and take action.
- We will review risk assessments when working habits or conditions change.

**Training:-**

- We will give staff and volunteers appropriate training.

**Consultation:-**

- We will consult staff and volunteers routinely on health and safety matters as they arise and formally when we review health and safety.

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### **3/. Staff background check statement:-**

This statement refers to our guidelines for investigating our staff and volunteers' backgrounds as part of our recruitment process. Background checks help us:

- Get insight into a candidate's background.
- Ensure we hire reliable staff and volunteers.
- Verify candidates' information for truthfulness and accuracy.
- Screen candidates convicted of serious criminal behaviour

Background checks may include: i/. Criminal records; ii/. Verification reports (e.g. identity, previous employment, education etc); iii/. Driving records; iv/. Reference checks.

All candidates aren't required to pass every type of background check we offer before Live Life Better hires them. Each position has its own requirements. For example, driving records may be relevant to those travelling to facilitate

workshops but not to a Silly Walk volunteer. The basic background screening includes DBS criminal records checks, verification reports and reference checks. Local laws may prohibit or restrict certain types of background checks. We'll comply with legal guidelines at all times.

Criminal record checks are essential if candidates are interviewing for positions where they will:

- Represent Live Life Better and interact with clients or stakeholders.
- Have any access to sensitive and confidential information
- Handle money and finances
- Have any contact with children or those with a disability or vulnerability

Our background checks reinforce hiring decisions and ensure candidates who have been selected for a role are suitable.

***Live Life Better's Responsibilities*** = Hiring manager (Olivia Roe) will:

- Inform candidates that a background check is required in the position's advertisement.
- Ask candidates to provide written permission before conducting a background check and let them know how long the process will take.
- Ask candidates to provide proof of their own DBS check(s) as required and for these to be carried out at candidate's own cost.
- Inform candidates of the results of their background checks and what we plan to do (reject or move candidates to the next hiring phase).
- Conduct a background check on all candidates who pass through the interview phase for a specific position without discriminating against certain individuals.
- Give candidates information they need to dispute a report or address any issues a background check turns up.

N.B. a clean background check doesn't guarantee employment, unless a verbal role offer has already been given. Hiring managers will keep Live Life Better's interests in mind and any potential high or unreasonable risk when rating the seriousness of issues that background checks uncover. For example, candidates who are considered for a position that involves driving a company car should have at least a two-year clean driving record.

Hiring managers can call candidates to discuss the results of their background checks in cases of minor discrepancies (e.g. a suspended license.) If candidates answer satisfactorily, they may still be hired to work with Live Life Better.

We aim for a transparent hiring process that respects candidates' rights and follow this procedure for background screening:

1. Hiring manager (Olivia Roe) decides whether a background check is needed for a position and what the check will include.
2. Hiring manager notes in the job ad that a background check is required before employment.
3. When the final candidates (one or more) are selected, hiring manager contacts the candidates to get written permission for background checks and explains the process.
4. If candidates refuse to go through background screening, hiring manager informs them that they won't be considered for the position. If candidates provide written permission, their DBS is sent in and their review is initiated.
5. Once background check review is completed, hiring manager decides on next steps for the candidates and the position.
6. Hiring manager informs candidates of their decisions. If there are negative findings, hiring manager will let candidates know how to dispute the report.

Our confidentiality and data protection policies always apply to information that background checks uncover.

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#### **4/. Safeguarding:-**

##### ***The purpose and scope of this safeguarding statement***

The aim of Live Life Better is to help parents and young people (5-18yrs) to be healthy and happy. This is done through family workshops, family-focused community events, family life coaching sessions and one-to-one life coaching with young people and parents.

##### ***The purpose of this policy statement is:***

- to protect children and young people who receive Live Life Better's services from harm. This includes the children of adults who use our services

- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of Live Life Better, including senior managers, trustees, paid staff, volunteers, sessional workers, agency staff and students.

### ***Legal framework***

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in the United Kingdom. A summary of the key legislation is available from [nspcc.org.uk/learning](http://nspcc.org.uk/learning).

### ***Supporting documents***

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents, including:

- Role description for the designated safeguarding officer
- Dealing with disclosures and concerns about a child or young person
- Managing allegations against staff and volunteers
- Recording concerns and information sharing
- Records retention and storage
- Code of conduct for staff and volunteers
- Photography and sharing images guidance
- Safer recruitment
- Online safety
- Anti-bullying
- Managing complaints
- Whistleblowing
- Health and safety
- Induction, training, supervision and support
- Adult to child supervision ratios

### ***We believe that:***

- children and young people should never experience abuse of any kind
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

### ***We recognise that:***

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

### ***We will seek to keep children and young people safe by:***

- valuing, listening to and respecting them
- appointing a nominated child protection and safeguarding lead for children and young people (Olivia Roe)
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers (e.g. no staff or volunteer to be alone in a closed room with child or young person at any time)
- developing and implementing an effective online safety policy and related procedures (staff and volunteers only liaise with parents/guardians via email, text, calls etc. Skype life coaching meetings with children/young people done in rooms accessible by parents/guardians)
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently (e.g. NSPCC's 'Introduction to Child Protection' & Future Learn's 'Child Protection' courses)
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made (e.g. DBS checks, references)
- recording, storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this below]

- sharing information about safeguarding and good practice with children and their families via leaflets, website, posters, group work and one-to-one discussions
- making sure that children, young people and their families know where to go for help if they have a concern (e.g. counsel, NSPCC, Childline etc)
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide safe physical environments for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

### ***Safeguarding all Live-Life-Better Clients...***

Please inform us if you are taking medications or have medical conditions relevant for our services (such as could occur during Sessions e.g. allergies, epilepsy, pregnancy) so we can help keep you safe.

The majority of Live Life Better services take place in public places (such as workplaces, cafes, outdoors etc.) so there will be others to support in keeping Clients safe if emergencies happen.

If a situation arises where an adult Client is significantly at risk of serious self-harm or harm to others, a swift decision may be taken to refer a Client to other services or therapy. The ICF's set of Guidelines on this gives more details (<https://coachfederation.org/app/uploads/2018/05/Whitepaper-Client-Referral.pdf>). Other services or therapies could include their GP, the Emergency Services, the local authority support services, The Samaritans, a local hospital, counselling, a psychotherapist etc.

A 'Question – Persuade – Refer' method will be used and the five-step action plan (developed by Mental Health First Aid Australia in their 'The Mental Health First Aid' training) will be followed to support Clients at risk of self-harm or harm to others:-

- Approach, assess, and assist with any crisis
- Listen and communicate nonjudgmentally
- Give support and information
- Encourage appropriate professional help
- Encourage other supports

In accordance with statutory requirements, where child protection issues are involved for under 18's, any disclosures will be reported to child protection authorities as will any reasonable suspicions or reasonable beliefs that a child is being harmed, has been harmed in the past or is at imminent risk of significant harm.

### ***Other Useful Resources and Areas for Support:***

<https://www.befrienders.org/>

NSPCC Helpline 0808 800 5000

'Suicide – a Forever Decision' book by Dr. Dr. Paul G. Quinnett file:///C:/Users/olivi/OneDrive/Live-Life-Better/Safeguarding/ICF%20support%20for%20clients%20in%20crisis/Forever\_Decision%20Book%20pdf%20.pdf

## **5/. Live Life Better Data Protection Policy – GDPR (General Data Protection Regulations)**

Our Data Protection Policy refers to our commitment to treat information of employees, customers, clients, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

This policy refers to all parties (employees, job candidates, customers, clients, stakeholders, suppliers etc.) who provide any amount of information to us. Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, volunteers, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

**Policy elements :-** As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, phone numbers, usernames and passwords, digital footprints, photographs, financial data etc. Live Life Better collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

***Your data will be:***

- used fairly, lawfully and transparently
- accurate and, where necessary, kept up to date
- used in a way that is adequate, relevant and limited to only what is necessary
- collected fairly and used for specified, explicit purposes only
- processed by the Live Life Better within its legal and moral boundaries
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage
- kept for no longer than is necessary
- protected against any unauthorized or illegal access by internal or external parties (e.g. password protected, locked cabinet etc)

***Your data will not be:***

- Communicated informally
- Stored for more than a specified amount of time (1 year after final communication from client)
- Transferred to organizations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

- Let people know which of their data is collected (e.g. names, addresses, phone numbers, emails, notes and activities done during meetings with dates and initials used, DOBs for young people)
- Inform people about how we'll process their data (names/addresses/phone numbers and brief notes on topics related to client kept in spreadsheet form on laptop – password protected. Notebooks and any activities used during meetings – kept in locked drawer. Emails kept online in folders (password protected).
- Inform people about who has access to their information.
- Have provisions in cases of lost, corrupted or compromised data.
- Allow people to request that we modify, erase, reduce or correct data contained in our databases.

***To exercise data protection we're committed to:***

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train staff and volunteers in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

***We adhere to data protection laws regarding:-***

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)

- health
- sex life or orientation

As well as safeguards for personal data relating to criminal convictions and offences.

All principles described in this policy will be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

### ***Your rights***

Under the Data Protection Act 2018, you have the right to find out what information Live Life Better stores about you. These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when Live Life Better is using your personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests

**Further reading:** [Data Protection Act 2018 :- http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted](http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted)

## **6/. Staff & Volunteer Confidentiality Policy**

### ***Policy brief & purpose***

We designed Live Life Better's **confidentiality policy** to explain how we expect all our staff and volunteers to treat confidential information. Staff and volunteers will unavoidably receive and handle personal and private information about clients, partners, stakeholders and Live Life Better. We want to make sure this information is well-protected. We must protect this information for two reasons. It may:

- Be legally binding
- Constitute the backbone of our business, giving us a competitive advantage (e.g. mailing and contact lists)

### ***Policy elements***

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Clients/Partners/Vendors/Stakeholders etc.
- Intellectual Property
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

Staff and volunteers may have various levels of authorized access to confidential information such as Client names (see below for more details on this).

All staff, volunteers and collaborators dealing with Intellectual Property created by Live Life Better are bound by copyright to keep this information within the business. They may need to sign Live Life Better's Collaboration Agreement (ask for details) if using Intellectual Property for our business purposes.

***What staff and volunteers should do:***

- Lock, secure or password-protect confidential information at all times
- Shred or delete confidential documents when they're no longer needed (1 month after completion of services unless explicitly agreed in writing to have data held permanently for a specific purpose such as on a mailing list for offers)
- Make sure they only view confidential information on secure devices
- Only disclose information to other staff and volunteers when it's necessary and authorized
- Keep confidential documents safe if having to move them e.g. emailing with password protection, taking a sign-up list of names to a workshop event
  
- Keep Intellectual Property within Live Life Better business purposes (as detailed in Collaboration Agreement).

***What staff and volunteers shouldn't do:***

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of Live Life Better
- Replicate Intellectual Property, confidential documents and files or store any of them on insecure devices

When staff and volunteers stop working for Live Life Better, they're obliged to return any Intellectual Property and confidential files and delete them from their personal devices.

***Confidentiality Measures***

We'll take measures to ensure that confidential information is well protected. We'll:

- Store and lock any paper documents
- Encrypt electronic information and safeguard databases
- Ask staff and volunteers to sign non-compete and/or collaboration agreements as applicable
- Ask for authorization by Olivia Roe to allow staff and volunteers to access certain confidential information

***Further details include:-***

- 1/. If you use Live-Life-Better's website contact form, your name, email and the date you contacted us, will all be noted and saved in a password-protected, LibreOffice spreadsheet. If you do not follow-up after we reply, your details will be deleted after 1 month.
- 2/. If you sign-up to our mailing list or via our community event feedback form, your email address will be stored in a password-protected, LibreOffice spreadsheet and you will only be contacted via a mailer being sent.
- 3/. On completing your Coaching Agreement form prior to Session 1, you will fill in your name, email, phone number(s), preferred way(s) of being contacted and any other details relevant for us to know (e.g. medications and medical conditions). This is so we can accurately contact you to arrange dates and times for Sessions and help keep you safe.
- 4/. If you choose to pay by online banking or iZettle reader, your details will appear on Live Life Better's Tide business bank account statement. This information is kept safe by their protection policies but, if you would like to, please do also ID yourself by initials only.
- 4/. Coaches will take brief notes on sessions. Only they will have access and read these notes as they will be password-protected in LibreOffice files. These notes serve as reflections, progress monitoring, administration and reminders of work undertaken together. They will all be deleted 1 month after coaching ends.

- 5/. When coaching ends, a feedback form will be sent about your experience of coaching, progress, next steps etc. You will also be asked in this if you would like to i/. have all your contact information permanently deleted (as well as your phone number on my phone OR 2/. Have your contact information permanently held and used for future offers, mailing list updates etc. You will be in charge of this decision.

### ***Exceptions***

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit
- If our company enters into a venture or partnership that requires disclosing some information (within legal boundaries)

In such cases, staff and volunteers involved should document their disclosure procedure and collect all needed authorizations. We're bound to avoid disclosing more information than needed.

### ***Disciplinary Consequences***

Staff and volunteers who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.

We'll investigate every breach of this policy.

This policy is binding even after separation of employment.

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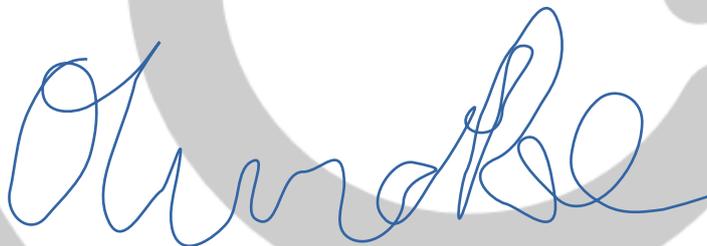
### **7/. Nominated Safety & Privacy Lead Contact details**

Name: Olivia Roe

Email: olivia@live-life-better.uk

This policy statement came into force on 31/3/20. We are committed to reviewing our policy and good practice annually. This Safety & Privacy Statement and accompanying procedures were last reviewed on 31/3/20

Signed:



Date: 31/3/20