



**Volunteer Policies covering;-**  
**Bedford & Milton Keynes Waterway Trust**  
**Bedford & Milton Keynes Waterway Enterprise Ltd.**  
**John Bunyan Community Boat & Electra Community Boat**

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## Introduction

The Bedford and Milton Keynes Waterway Trust (BMKWT) exists to promote the development of a nationally recognised waterway park linking Bedford and Milton Keynes. The Trust has a trading arm, Bedford & Milton Keynes Waterways Enterprises Ltd (BMKWEL), which operates several community trip boats by local Operations Management Teams.

Bedford & Milton Keynes Waterway Trust and its subsidiary Bedford & Milton Keynes Waterway Enterprise Limited (collectively known as the “Trust”) are committed to providing a safe, healthy, and productive working environment for all volunteers, contractors, customers carried on the Trust’s community boats, and visitors involved in its operation.

## 1 General Policy

### Expenses and Purchases

The Trust does not pay expenses for local travel, parking or refreshments while volunteering. Authorized purchases are made by nominated volunteers, following Trust procedures. Occasionally, volunteers may be asked to make small purchases and submit a claim for repayment.

### Trust membership

All volunteers are expected to support the objectives of the Trust and are offered for free full membership while they are in a volunteering role if they wish to become a Trust Member.

### Commitment to Diversity

All volunteering will be guided by Bedford & Milton Keynes Waterway Trust Equal Opportunities Policy. The Trust aims to build a culture that champions diversity and inclusion, advances equality of opportunity and fosters good relations between different people. The Trust encourages all members of the community to participate in its volunteering activities and will not accept any discrimination by a member towards any other person, whether within or outside the organization.

Trust is committed to building a team of volunteers that represents a variety of backgrounds, perspectives, and skills. The more inclusive we are, the better the experience will be for volunteers and customers alike. The Trust aims to build a culture that champions diversity and inclusion, advances equality of opportunity and fosters good relations between different people when carrying out activities. The Trust encourages all members of the community to participate in its activities and will not accept any discrimination by a member towards any other person, whether within or outside the organisation.

### Safety First

Safety and Legal Compliance In everything the Trust does, the safety of all volunteers, the public and any support staff or contractors is our priority. Volunteering will be governed by all relevant legal codes of conduct and regulatory requirements and full training provided wherever and whenever required. Volunteers will be covered by the Trust's insurance policy.

In operating the safety of all volunteers' contractors and customers is the Trust's top priority.

The following policies are the Trust codes of conduct and regulatory requirements that all volunteers must comply with at all times. Full safety training is provided during recruitment and refreshed annually as needed.

## **2 Disability Access Policy**

This policy statement sets out the principles that will guide our work with regards to disability access, and outlines the principal areas of responsibility

### **2.1 Definitions**

\* Disability is defined as a loss or reduction of functional ability that results from a physical, cognitive, or other impairment, and includes physical, intellectual, sensory and psychiatric disabilities.

\* Access means physical access to buildings and monuments and access to services, by a wide variety of means. In practice, the measures taken to improve access for people with disabilities, from an adoption of the principles of 'universal design' to the provision of temporary ramps and suitable lift structures used on community boats for passengers to access the cabin, plus access for anyone and help anyone who do not consider themselves 'disabled' or whose disabilities needing help to embark and disembark.

### **2.2 Policy**

Wherever possible, to provide suitable access to premises and Trust owned property such as the community boats operated by BMKWEL.

All access points on the community boat are reviewed annually as part of the accessibility plan and suitable adaptations are made under the Equality Act 2010 and the building regulations. When planning events and functions ensure that buildings are disable friendly with suitable access points, lifts etc.

Adaptations to the physical environment will include:

- a. suitable access to all parts of the building and grounds used by BMKWT and BMKWEL.
- b. the provision of disabled parking bays close to the building for locations used by BMKWT and BMKWEL
- c. the fitting of covered ramps and slopes to replace stairs and steps where appropriate.
- d. the fitting of suitable grab rails and handrails where appropriate
- e. ensure doorways and walkways are wide enough for wheelchair access.
- f. a review of floor surfaces and coverings to make them slip and trip free.
- g. a review of signage to ensure that visitors and passengers know where they are and how to get to their destination.
- h. provision of flat, safe paths leading from the car park.

### **2.3 Training**

All volunteers are offered training covering basic information about duties and responsibilities under the Equality Act 2010 and about health and safety risk management and the reporting of hazards. All new volunteers receive initial training, including a comprehensive tour and guidance on improving access and procedures wherever possible. Volunteers are trained to be more aware of disabled access issues and to consider how services can be provided in ways that disabled people would find more convenient.

### **3 Drug and Alcohol Abuse Policy**

#### **3.1 Introduction**

This policy sets out our aims in reducing and managing alcohol & drug problems in the workplace. Alcohol and drug problems are associated with a wide variety of costs for both the Trust and Enterprise Limited and volunteers carrying duties on behalf of either organisation.

These costs include ill-health sickness absence, reduced work performance, and accidents.

Consumption of drugs and alcohol (including prescription and over the counter drugs) or intoxication during working hours implicates the health and safety of the individual and others, since these substances impair coordination, judgement, and decision making. Irresponsible behaviour resulting from the misuse of drugs and/or alcohol may damage our reputation and/or business, and as such, is a policy matter.

#### **3.2 Policy Objectives**

- I. To state our position on alcohol and drugs with regard to volunteers carrying out duties at events or on property and premises the organisations operate in.
- II. To ensure we comply with appropriate legislation.
- III. To minimise the creation of risks caused by or associated with alcohol and drugs at work.
- IV. To have clear rules regarding substance misuse in the workplace.
- V. To provide volunteers with training on the adverse health effects of alcohol and drugs.
- VI. To encourage the early identification of substance misuse
- VII. Identifying problems at the earliest stage
- VIII. To support volunteers experiencing alcohol and drug problems.

#### **3.3 Definitions**

**Alcohol abuse** – we define alcohol abuse as any drinking, either intermittent or continual, which interferes with health and/or social functioning and/or work capability or conduct.

**Drug** – we define drugs as illegal, prescribed and over the counter medicines and solvents. In the case of prescribed and over the counter drugs, we recognise that their possession and use by the employee is legitimate.

**Drug abuse** – we define drug abuse as the use of illegal drugs, the deliberate misuse of prescribed or over the counter drugs, and the use of solvents, either intermittent or continuous, which interfere with health and/or social functioning and/or work capability or conduct.

#### **3.4 Legal**

Under the Health and Safety at Work Act 1974, we recognise the duty to protect the health, safety, and welfare of volunteers and others who are (or may be) affected by their activities, as far as is reasonably practicable, and we are committed to taking measures to ensuring this safety.

Under the Management of Health and Safety at Work Regulations 1999, we will carry out a risk assessment to identify workplace hazards and put measures in place to minimise these risks.

Under the Misuse of Drugs Act (1971), it is illegal for anyone, to produce, supply or be in possession of illegal drugs.

The Trust may be liable if they knowingly allow a volunteers, contractors, customer, or service user to dispense, manufacture, possess, use or sell drugs on at events or property own by the Trust such as a Community Boat.

### **3.5 Policy Rules**

We require all volunteers to come to work free from the effects of alcohol and drugs. Working under the influence of alcohol or drugs or consuming of alcohol or drugs during hours of work on, is unacceptable behaviour at events or property own by the Trust such as a Community Boat. Volunteers found in possession of illegal drugs or using illegal drugs while at work will normally be reported to the police.

If the legitimate use of prescribed drugs is likely to affect job performance and safety, volunteers should inform their line manager immediately.

Volunteer crew members should not be under the influence of drugs or alcohol when arriving for a trip and should not drink alcohol or take any non-prescription drugs during the trip. As guidance, if a volunteer is unfit to drive a car, then that volunteer is unfit to act as crew.

If the Boatmaster believes that a crew member is under the influence of drugs or alcohol, then that crew member will be removed from the trip (as a duty of care, the Boatmaster should make a decision on safety of the volunteer in respect of home travel etc.).

If a volunteer crew member believes that the Boatmaster is under the influence of drugs or alcohol, the crew member should raise this concern with the Boat Operations Manager, or Chairperson for relevant Management Operations group and, if the concern is not resolved, should phone the Bedford & Milton Keynes Waterway Enterprise Limited Chairperson for guidance. The instances should be reported to the Safety Officer who will report to the Boat Operations Manager / Lead Skipper, but otherwise kept confidential. The volunteer will be contacted to discuss the matter with the crew member to offer advice and support as appropriate.

### **3.6 Education**

We are committed to promoting health and welfare at work. We will provide volunteers with information on safe and sensible drinking and the risks associated with drug use. We will disseminate this information via written materials and email communication.

We are committed to providing suitable and sufficient training to help managers/directors enforce this substance misuse policy and support any volunteers with a problem.

New managers/directors will be made aware of their responsibilities in relation to this policy. New volunteers will be made aware of this policy during the initial training and a copy will be made available during initial to be signed before volunteering for as crew or volunteering for events run by the Bedford & Milton Keynes Waterway Trust or Enterprise Limited. Volunteers are required to re-sign the policy yearly when undergoing any refresher training.

This policy will be made available on the Bedford & Milton Keynes Waterway SharePoint and in the Volunteer member's area on the website.

### **3.7 Prescription Drugs:**

All volunteers are encouraged to notify the organisation if they take prescription drugs and/or over the counter preparations which could affect their performance and/or create a safety risk. The notification should be made to a Boatmaster or, in confidence, to the Safety Officer.

### **3.8 Identifying a problem**

Substance misuse may become apparent through a number of signs. The following list of signals (particularly in combination) could indicate an issue. This list is not exhaustive.

- Persistent short-term absence.

- Frequent crew absence.
- Recurrent small accidents.
- Poor time keeping.
- Inconsistency in work performance.
- A breakdown in working relations.
- Paranoia/aggression.
- Deterioration in physical appearances, such as dental problems/weight loss.

These factors can have a number of other causes, and we encourage managerial staff to use all the information at their disposal and intellectual discretion to identify a potential problem.

Colleagues may be the first to notice when an employee is misusing substances. If a member of staff suspects an alcohol or drug problem in a colleague, they should either:

- Encourage the person to seek help from support agencies.
- Report the matter to an Organisations Chairperson/Manager/Director/Boat Master/Lead Kipper (particularly if the person is involved in a safety critical job).
- Persistent short-term absence

### **3.9 Confidentiality**

All appropriate Directors/Managers must maintain confidentiality for any volunteer who is experiencing problems with drugs and alcohol, must not divulge information regarding individual cases to third parties.

Information can only be divulged in cases where safety would be compromised by not doing so.

### **3.10 Return to Voluntary Work**

After the successful completion of treatment, the company will try to make sure that the volunteer returns to their existing role. However, if the volunteer is unable to fulfil their required duties, we will consider alternatives duties.

### **3.11 Equal Opportunities**

This policy applies equally to all staff regardless of grade, experience, or role within the company.

### **3.12 Misconduct**

Our policy is principally concerned with ongoing issues of substance misuse. We class these as 'capability issues' as the problem will primarily impact how the individual performs their job.

In circumstances where a volunteer breaches the policy on an individual case, such as reporting for work drunk or being under the influence of drugs at work, we will class this behaviour as a conduct issue and handle it via the normal disciplinary procedures.

If a volunteer, for example, is violent at work while under the influence of any substance or deals illicit substances at work or any other very serious incident, we will consider this serious misconduct and are justified in releasing the volunteer from all volunteering aspect concerned with the Trust and Enterprise Limited business.



#### **4 Equal Opportunities Policy**

The Trust is an equal opportunities organisation, committed to developing a waterway park which is designed and managed to be a socially inclusive waterway for all and is committed to equal opportunities in its operation of community boats.

In all activities internally or in contact with the public it is determined that no member, supporter or member of the public should be disadvantaged by reason of their race, sex, colour, sexual orientation, religion, political beliefs or disability.

It is the Trusts policy to actively encourage participation from all sections of society in its work as an advocate for the Waterway and operation of any community boat. Both organisations will work with others who aspire to achieve Equal Opportunities objectives.

The Trust encourages all members of the community to participate in their activities, and will not accept any discrimination by a member towards any other person, whether within or outside the organisation.

This Equal Opportunities Policy will be regularly monitored, and all persons involved in running both organisations are encouraged to report any occasion when they feel that Equal Opportunities have not been respected.

## **5 Safeguarding-Child, Young person and Vulnerable Adult Policy**

### **5.1 Statement of Intent**

All children, young people and adults have an absolute right to be safe from harm. The Bedford & Milton Keynes Waterway Trust through the Bedford & Milton Keynes Waterway Enterprises Ltd operates the Community Boats. Those organisations have a duty of care and will take all necessary steps to promote welfare and wellbeing.

The Community Boat Public Trip Booking Terms & Conditions document states that unaccompanied minors are not permitted as passengers. Unaccompanied minors are defined as being below the age of 16. The safety and behaviour of minors is the responsibility of the accompanying adult. The crew must never be placed in a situation where they are left with unattended children or vulnerable adults.

### **5.2 Aims of the policy**

- Raising the awareness of the duty of care responsibilities relating to children, young people and vulnerable adults throughout the organisation.
- Actively encouraging good practice amongst all staff and volunteers throughout the organisations and promoting wider awareness wherever possible with user groups.
- Creating a safe and healthy environment and avoiding situations where abuse or allegations of abuse may occur.
- Listening to children, young people and vulnerable adults, minimising dangers and as appropriate working with other agencies.
- Training, supervising and supporting staff and volunteers who work with children, young people and vulnerable adults to adopt best practice to safeguard and protect children, young people and vulnerable adults from abuse and themselves against false allegations.
- Responding to any allegations appropriately implementing appropriate procedures.
- Requiring staff and volunteers to abide by the Child, Young Person and Vulnerable Adult Protection Policy and procedures.

### **5.3 Objectives**

- To enable staff and volunteers to recognise the potential signs and indicators of abuse and to improve good practice.
- To aid staff and volunteers to respond sensitively and seriously to a child or young person or vulnerable adult who discloses information about abuse and be confident and able to take appropriate action swiftly, regardless of whom the allegation is about, e.g. carer/member of staff.
- To maintain a level of good working practice at all times and therefore reducing the risk of children, young people and vulnerable adults under the care of our staff and volunteers.
- To promote the general welfare and wellbeing of children, young people and vulnerable adults during the services provided.
- To develop and implement effective procedures for recording and responding to incidents and accidents.
- To develop and implement effective procedures for recording and responding to complaints of alleged or suspected abuse.

## **5.4 Contact details**

### **5.4.1 The Bedford & Milton Keynes Waterway Trust and Bedford & Milton Keynes Waterway Enterprises Ltd Safeguarding Officer**

Name: Chris Hilliard, c/o BMKWEL, The Old Chandlery, Priory Marina, Priory Country Park, Bakers Lane, Bedford. MK41 9DJ

### **5.4.2 How to raise concerns about a child or young person**

If someone is at immediate risk of harm, dial 999 for the police.

To report a concern or to get advice:

- NSPCC Helpline: 0800 800 5000
- Bedford Borough Council: 01234 718700 (office hours) or 0300 300 8123 (out of office hours)
- Central Bedfordshire Council: 0300 300 8585 or 0300 300 8123 (out of office hours)
- Milton Keynes Council: 01908 253169 or 01908 265545 (out of office hours)

### **5.4.3 How to raise concerns about an adult**

If someone is at immediate risk of harm, dial 999 for the police.

To report a concern or to get advice:

- Bedford Borough Council: 01234 276222 or 0300 300 8123 (out of office hours)
- Central Bedfordshire Council: 0300 300 8122 or 0300 300 8123 (out of office hours)
- Milton Keynes Council: 01908 253772 or 01908 725005 (out of office hours)

## **6 Health and Safety Policy**

The Trust and its subsidiary are committed to protecting the health and safety of all members, volunteers, and members of the public. It is the responsibility of Staff, Members and Volunteers to ensure that their environment around them is safe and takes step to remove any unsafe obstacles or working themselves or report to the Trust or Enterprise Ltd Manager or Director.

At all official events and operation of community boats that are operated on-behalf of the Trust, all members and volunteers must at all times act in a way which will minimise any risk to the health and safety of the general public, their fellow volunteers, or to themselves. The absolute priority is the health and safety of its staff, volunteers, customers, and other river / canal users in all aspects of its operation, while promoting awareness of the environment and minimising the environmental impact of its operation.

For each Event and/or Cruise, the following points must be observed:

### **6.1 Accident Incident Reporting**

Any accident, incident, or situation to do with running any event which puts at risk the health or safety of any person, whether a participant in the event/cruise or not, must be reported without delay to the Event Organiser or the Boat Master/Skipper if on a Community Boat and the designated Health & Safety Office or his/her representative.

Land Based accidents / Incidents

Accidents, incident, or situation that happen on Land or if the boat is securely moored and no passengers are on board, then an accident or serious incident must be reported under the (RIDDOR) Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (these regulations being enacted under the scope of the Health & Safety at Work, etc., Act 1974). The Regulation (reg.2(1)/ Sch.1) defines major injuries or illnesses as those requiring hospital treatment or as leaving the employee incapacitated (unable to work normally) for 7 continuous days. Dangerous occurrences are defined in (reg.2(1)/ Sch.2, Pt.1, paras.1-17). The report should be made to the Health and Safety Executive (HSE) or to an enforcing body to which the HSE has delegated its powers (this will usually be the MCA (MAIB) for accidents on licensed boats).

Marine – Boat accidents / Incidents

When the boat is underway or moored with passengers on board, an accident or serious injury or as defined in MGN 458, Annex B, or serious incident (using the 2005 regulation - MGN289 - definitions) must be reported as soon as possible to the Chief Inspector of the Marine Accident Investigation Branch (MAIB). This guidance is a requirement due to MSN 1754, paras. 17 & 18. MGN 158, para 6.6 requires that these procedures be well understood.

### **6.2 Guidance on Categories of injuries, incidents and accidents**

- Death, Broken bone, major eye injury, serious burns, severed limbs or digits.
- Hospitalisation (other than precautionary).
- Person overboard and injured.
- Failure of lifting equipment that might or did result in injury.
- Collision, fire or other damage which might affect the validity of the Passenger Certificate.
- Pollution incident.

The following report forms are used to incidents & accidents, which are also available on the community boats:

- B1510 Accident Book

- F2508 RIDDOR Forms
- MAIB Accident Report Forms (ARF)

Pollution incidents will also need to be notified (phone call to Emergency Number in SARCO Plan document) to the Environment Agency, as should incidents involving damage to locks or other waterway structures.

Following an accident, incident, or other emergency, once the situation is secure, under control and presenting no further hazard, the senior person present (Boatmaster or, if summoned as part of emergency support, BMKWEL Director) should ensure that the following take place or have been completed:

- If an accident has resulted in injury, the appropriate entry is made in the Accident Book.
- Names and contact details of witnesses are collected.
- If a report to the Authorities may be needed, then an initial notification report should be made by phone to the HSE or MAIB as appropriate (they will advise on other notifications and whether the F208 or MAIB ARF or both are to be used)
  - HSE Contact Centre phone number 0845 300 9923
  - MAIB 24hour phone number 023 80 232 527
- All accidents/incidents will be investigated as soon as possible after the event. The purpose is to establish the cause of the accident and prevent a recurrence. The results of the investigation and actions taken are recorded initially in the Accident Book, and the full detail of the investigation in a written report to include likely causes, contributory factors and recommendations to avoid recurrence.
- The Boat Management and Trust Board shall be notified as soon as possible of all notifiable incidents / accidents along with copies of report and findings.

## 6.3 Fire Hazard

The Event Organiser or Boat Master/Skipper must ensure that the fire regulations for any Boat / premises used are strictly adhered to. In addition, must ensure that no activity occurs which presents a fire risk, regardless of whether this is specifically forbidden.

All fire-fighting equipment Extinguishers, Fire blankets, to be checked annually and certified by approved company to audit fire safety equipment.

## 6.4 Risk Assessment

In advance of Trust event's Organisers are required to complete a risk assessment.

All BMKWEL community boat operations and events require the completion require risk assessments for all aspects of operating the craft safely on waterways. All risk assessments to be carried out by the designated Health and Safety officer, who can also be Certified Skipper, MCA certified Boat Master or Boat Operations Manager.

All Risk Assessment reviews are to be carried out yearly and date when the review took place, along with who carried it to be recorded on the Risk Assessment.

## 6.5 Training

The BMKW Trust and BMKWEL must provide adequate training with assessment to ensure that all volunteers are competent to fulfil their assigned roles. All volunteers must be given health, safety and environment induction training as well as role specific training and training in the use of personal protective equipment (PPE) such as life- jackets. Records will be kept of training for each volunteer.

## 6.6 Safe Working Environment

The BMKW Trust and BMKWEL must

- provide safe and healthy working conditions, maintain equipment and ensure safe storage/ use of substances hazardous to health or the environment.
- ensure toilets, washing facilities and drinking water are provided.
- regularly review systems in place for routine inspections and testing of equipment and for ensuring that prompt action is taken to remedy any defects.
- Ensure volunteers trained in the safe handling of substances.

## 6.7 Lone Working

Any members wishing to undertake such lone working do so at their own risk and must observe common sense safe working practices for their environment., Individuals must advise a third party of their whereabouts and planned activity.

## 6.8 Protection of Minors

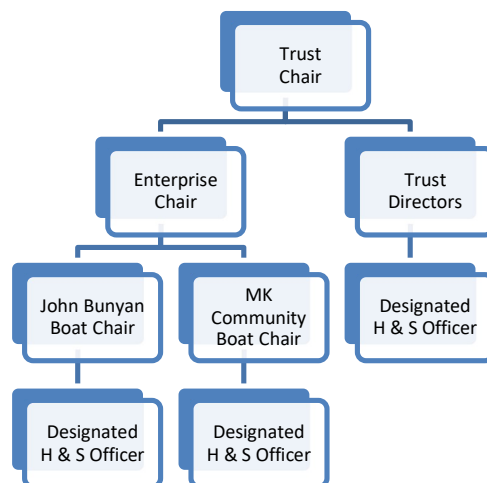
No person under 16 shall be allowed to participate in volunteering to be part of an event or volunteer to crew any of the community boats operated by the Trust subsidiary. Any persons under that age attending any Trust Event or as a customer on cruise/event undertaken must be accompanied by an adult, who shall remain responsible for ensuring all aspects of health and safety for the young person(s)

## 6.9 Management Responsibility

The BMKW Trust and BMKWEL must engage with volunteers on day-to-day Health & Safety conditions, environmental issues and providing advice and supervision on occupational health. Volunteers should be routinely consulted on health, safety and environmental matters as they arise.

## 6.10 Accountability

All directors, volunteers, members of the Trust and Enterprise Ltd are accountable and responsible to implement the Health & Safety Policy. All incidences and violation of the Health & Safety Policy requires being reported to relevant Chair or acting Chairs.



### **6.11 Designated H&S Officers**

Bedford & Milton Keynes Waterway Trust:- James Barbour

Bedford & Milton Keynes Waterway Enterprise Limited – John Bunyan Boat: - John Daniels

Bedford & Milton Keynes Waterway Enterprise Limited – Electra Community Boat:- Denise Taylor

## **7 Food Handling and Hygiene Policy**

Trust is committed to protecting the health and safety of all members, volunteers, and members of the public. It is the responsibility of staff, members and volunteers to ensure that their environment around them is safe and take reasonable steps to remove any unsafe obstacles or situations.

All members and volunteers must at all time act in a way which will minimise any risk to the general public, their fellow volunteers, or to themselves in the handling of food. The absolute priority is the health of staff, volunteers, customers and other river / canal users in all aspects of operation, while promoting awareness of the environment and minimising the environmental impact of the operation of the Trust.

For each event and/or cruise, the following points must be observed:

### **7.1 Handling Prepared Food**

For Trust events the food will be pre-packaged. The snacks sold from the galley e.g. crisps, peanuts, cakes and biscuits are all purchased as wrapped products.

The supply of pre-ordered food at events, such as the cream teas, ploughman's, picnic boxes and fish and chips will come packaged ready to be supplied to passengers, volunteers or Trust members. Handling of food will be kept to a minimum and supply of food will be from known suppliers having a current 4 or better Star Food Standards Agency (FSA) Food Hygiene rating as defined in the UK Food Standard Act 1999

The handling of alcoholic and non-alcoholic drinks shall be carried out according to the latest Food Standards Agency (FSA) guidelines and Enterprise Food Handling & Hygiene training.

All pre-heated food received from 3<sup>rd</sup> Party provider should be distributed to the passengers as soon as it has been received from the provider and not reheated.

Pre-ordered/package chilled food needs to distributed to the passengers within 1 hour of receiving from 3<sup>rd</sup> party providers, if the pre-ordered/package is not going to be distributed within 1 hour, it should immediately be refrigerator to a temperature between 1°C - 4°C

All food being used for chilled alcoholic and non-alcoholic drinks should be kept refrigerated to a temperature between 1°C - 4°C.

Fresh milk should be brought for each trip by the Purser and kept in the fridge. Waste milk should **NOT** be poured away down the sink into the river/marina/canal as it can be harmful to wildlife.

### **7.2 Personal Hygiene**

Before handling any food or preparing drinks, food handlers **MUST** wash their hands, using anti-bacterial soap and hot water in the dedicated hand-wash sink, using paper towels to dry hands, disposing of towels in the bins provided. Disposable plastic gloves are provided in the galley for use when preparing or handling food.

Long hair is to be tied back or netted. In addition, any person showing signs of ill health will not be permitted to handle food or within 48 hours of the last episode of vomiting or diarrhoea.

Food handlers should wash their hands regularly, especially

- After visiting the toilet
- After eating, coughing, sneezing, blowing nose etc.
- After handling ropes, waste food or refuse
- After handling cleaning materials



Any cuts, spots or sores on the hands and arms must be covered completely with a waterproof dressing.

### **7.3 Cleaning of food preparation areas.**

You should do the following things:

- Clean and disinfect food areas and equipment between different tasks, especially after handling raw food.
- All food preparation surfaces are first washed with hot soapy water or a cleaning product (such as a sanitiser) to remove physical dirt, grease and debris from the surface and then disinfected with a sanitiser.
- Clean as you go. If you spill some food, clear it up straight away and clean the surface thoroughly.
- Use cleaning and disinfecting products that are suitable for the job and follow the manufacturer's instructions.
- Disinfecting products should meet the BS EN standards. Check product labels for either of these codes: BS EN 1276 or BS EN 13697.
- Do not let food waste build up. Dispose of food waste suitably. All waste needs to be sorted into food, recyclable, and non-recyclable for correct disposal.
- Use a cleaning schedule to make sure that surfaces and equipment are cleaned when they need to be. It can also help to stop cleaning products being wasted or used incorrectly.
- All chopping boards are to be cleaned after use with warm, soapy water, then cleaned with an anti-bacterial cleaner and thoroughly rinsed and dried with paper towels.
- Fridges and the icemaker are to be cleaned regularly and all items in the fridges checked for their sell-by or best before dates and correctly disposed of.

### **7.4 Steps for cleaning effectively**

Not cleaning thoroughly is one of the most common reasons why food businesses are prosecuted.

### **7.5 Disinfecting products**

Any chemicals used in food establishments to clean and disinfect food contact surfaces and equipment must be approved as food safe. You are advised to follow the manufacturer's preparation and cleaning instructions. You should pay particular attention to contact times.

#### **7.5.1 Detergents**

Detergents clean the surface and remove grease, but they do not kill bacteria and viruses.

#### **7.5.2 Disinfectants**

Disinfectants kill bacteria and viruses, and should be used on a visibly clean surface. They do not work effectively if the surface is covered in grease or visible dirt. It is also important that you leave the product on the surface for the time specified in the instructions.

#### **7.5.3 Sanitisers**

Sanitisers can be used to both clean and disinfect as part of a two-stage approach. First use the sanitiser to clean the surface, removing any:

- dirt
- food
- grease

Re-apply to the visibly clean surface and leave for the required time to disinfect the surface.

#### **7.5.4 If disinfecting products are not available**

If the cleaning and disinfecting products you routinely use are not available, you should seek approved, food-safe alternatives with equivalent and effective properties.

Both alcohol-based sanitisers/surface disinfectants (in concentrations of 70-80%) and common disinfectants based on ammonium compounds or chlorine (bleach), can be effective. They can be applied either as a combined detergent-disinfectant solution or when adopting a two-stage approach as a disinfectant following cleaning with a detergent. In either case, food contact surfaces should be washed down with water to prevent chemical contamination of food.

You must ensure:

- the manufacturer's instructions on use are followed, including using appropriate dilution rates and contact times
- the health and safety of staff is considered, the Health and Safety Executive (HSE) provides [guidance on the use of chemicals in the workplace](#); and
- the suitability of the chemicals for the surfaces to be cleaned and disinfected.

Further advice should be sought from your food safety consultant if required.

If alternative disinfectant products are not available, food businesses may wish to consider using heat as a Critical Control Point. Kitchen items such as knives and utensils can be put into a dishwasher, rated for disinfection, or submerged into boiling water. Surfaces can also be steam cleaned.

#### **7.6 Record Keeping**

All Temperature checks and cleaning as per the cleaning schedule are required by law to be recorded. Food Hygiene records are required to be kept for a minimum of 6 months and made available at any time to the food standards agency or any government agency.

## **8 No Smoking Policy**

This No Smoking Policy sets out the duty of the Bedford & Milton Keynes Waterway Trust and its subsidiary Bedford & Milton Keynes Waterway Enterprise Limited (collectively known as the “Trust”) to provide a safe working environment and to uphold the ban imposed on smoking in public places and the banning the use of electronic cigarettes (e-cigarettes) in the workplace or on the Community Boats.

If the Trust fails to enforce the provisions laid out in this document it will face heavy fines. Simply possessing a smoking policy and ensuring that all volunteers are aware of it may be sufficient to eliminate or reduce a Company’s liability to pay such fines in the event that a volunteer, visitor or passenger does commit an offence.

### **8.1 Background Legislation:**

The Health and Safety at Work Act 1974 (The Act) and the Workplace (Health, Safety and Welfare) Regulations 1992 places a duty on organisations to provide a working environment for volunteers, employees & contractors that is safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work.

The Smoke-Free (Premises and Enforcement) Regulations 2006 made under The Act require Trust and Enterprise Limited Directors / Managers to:

- Ban smoking in enclosed or substantially enclosed workplaces (including work vehicles), and enclosed and substantially enclosed places to which the public have access.
- Display no smoking signs at each entrance to smoke-free premises and in smoke free vehicles, including Community Boats, Hire Coaches and Taxi’s if provided to transport Passengers or Volunteers.
- Enforce a policy to stop people smoking in smoke-free places and vehicles.
- Ensure cigarettes and other smoking materials are extinguished and spent matches properly disposed of before entering any smoke free areas.

### **8.2 Definitions used in this policy:**

Electronic cigarette/ e-Cigarette: battery powered product that releases vapour that contains liquid nicotine or other substance and is inhaled by the user.

Vaping is the use of an e-cigarette.

### **8.3 Policy:**

This policy applies to all volunteers, temporary workers, contractors, sub-contractors, and visitors to the site.

The Trust recognises that it has a duty to ensure, as far as is reasonably practical, that employees, agency workers, volunteers, contractors, and visitors have a right to work in or visit Trust premises without being exposed to tobacco smoke. These issues involve concern for the comfort, as well as the health and safety of all employees and visitors. This policy forms part of the Trust’s commitment to the health, safety and wellbeing of its staff.

The Trust is committed to ensuring that non-smoking is the expected standard for volunteers on Trust premises. The Trust also wishes to reflect its approach to the known risks to peoples’ health from smoking and develop and encourage a healthier lifestyle for all its volunteers and contractors.

The Trust seeks to provide non-smokers the right to work in air free of tobacco smoke, whilst also taking account of the needs of those who smoke. The Trust is committed to providing a safe and healthy working environment and as such limits the exposure of all workers and visitors to

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tobacco smoke, operating a strict no smoking policy, unless in designated smoking areas. This policy forms part of the Health and Safety Policy, any breach of this policy will lead to the normal disciplinary procedures being applied.

Smoking, vaping or being in the possession of lit cigarettes, cigars or pipes is not permitted anywhere on site, except in designated smoking areas.

The Trust also prohibits smoking/ vaping in company cars, vans, community boats that are operated on behalf of the Trust or other transport provided as part of the cruise program.

Those wishing to smoke or vape may be permitted reasonable breaks, in agreement with their line management, provided they do not prevent them from carrying out their responsibilities and work duties.

Smoking and vaping may only take place in designated smoking and vaping areas and smoking paraphernalia must be disposed of safely in the ashtrays, bins or sand buckets provided.

Smoking or vaping must not be within 3 metres of any workspace, office or community boat.

Any failure to comply with this policy may result in disciplinary action being taken or a person may be removed from site. Any passenger failing to comply with this policy will be asked to leave the community boat at the next suitable location to do so.

Smokers are reminded that it is a criminal offence to smoke in smoke-free areas.

## **9 Complaints Procedure**

The Complaints policy and procedure for the Bedford Milton Keynes Waterway Trust (BMKWT) and its social enterprise, Bedford and Milton Keynes Enterprise Limited (BMKWEL) which operates community boats on behalf of the Trust (BMKWT). The Complaints Procedure ensures that individual / organisations / passengers who are aggrieved can make a formal complaint, and are thus confident that it will be properly addressed and also ensures managers / directors within BMKWT and BMKWEL know how to deal with a complaint, and who to refer it to, so as to provide resolution. All parties should be confident that complaints and grievances are being addressed appropriately.

The Complaints Procedure is not intended as a process to appeal against commercial decisions (such as the price of a book or entrance fee at an event), nor against policy decisions already decided by the BMKWT and BMKWEL boards or at AGMs.

Passengers on the Community boats should be aware that decisions to close the waterway to navigation are taken by the Environment Agency as the body responsible for rivers or Canals and River Trust. Cruises will be cancelled if the waterways are closed to navigation and an alternative date or a refund will be offered. Cruises may also be cancelled if the Boat Master or Boat Skipper responsible for a cruise judges it is not safe to proceed with the cruise. The Boat Master or Boat Skipper also has the right to refuse to carry a passenger/s and to require a passenger/s to disembark where this is in the interests of health and safety of remaining passengers. Passengers under undue influence of alcohol or other substances will not be carried. Passengers with particular access and other requirements should register these at the time of ticket purchase so that accommodation of these needs can be discussed and agreed.

The policy concerning all grievances and complaints is to try to avoid them arising in the first place, but where they do arise to address them as quickly as possible, so they do not grow or fester. The first duty of both the complainant and the 'complained to' should therefore be to try to resolve any unhappiness as quickly as possible. A prerequisite of this is that a complainant knows the right person or place to address their concern, or ultimately to make their complaint. They may also require some help to progress their concern in the most constructive manner. The Complaints Procedure outlined below tries to assist this process.

### **9.1 The three stages of the Procedure are as follows:**

#### **9.1.1 Stage 1**

Both parties should try to resolve the problem in person without the need for it to be escalated elsewhere at the time of incident/complaint being made. Advice is available from a Trust or BMKWEL's Board members if a complainant does not know the right place for a grievance to be addressed. Ultimately, if a resolution is not forthcoming between the parties then the complainant should write a letter which can be sent electronically. Contact details are on the website [www.b-mkwaterway.org.uk](http://www.b-mkwaterway.org.uk). Complainants should expect a written response within 28 days from the chair of BMKWEL or if it relates to Community Boat operations or the Chair of Strategy & Governance Group of the Trust.

#### **9.1.2 Stage 2**

If the first stage of the procedure does not resolve the grievance, then the complainant should formally make a complaint. This should be done in writing, addressed to the Chair of the Trust board Contact details can be found on the website or the Chair of the BMKWEL. Copies of the written letter from the first stage and any response received should be enclosed. The Chair will then independently review the complaint made and seek advice of why the complaint has been

rejected. The Chair will then decide whether or not the complaint is justified, what remedy, if any, should be provided, and will then convey that decision, in writing, to all parties concerned. This should be communicated to both the complainant and 'the complained about' at the same time, and within 42 days. This time is designed to allow sufficient for the Chair to make any necessary enquiries, etc.

The Chair is likely to refuse any 'second stage' complaints where the first stage has not been carried out or complaints are not put in writing, or where the complainant refuses permission for their complaint to be shown to the parties that they are complaining about. Directors and other managers receiving complaints direct should refer the complainant to the proper procedure, or to the Chair to give advice on how to proceed with the complaint.

If the first stage involves a grievance with the Chair of BMKW Trust, then in this circumstance, the formal complaint will escalate immediately to Stage 3. And stage 2 will be omitted.

### **9.1.3 Stage 3**

If either party is dissatisfied with the outcome determined by the Chair of the BMKW Trust at the second stage outlined above, then there is a final stage of appeal, which can be made to the BMKWT Board Members. This should be addressed to the Secretary of the BMKWT Board. It would then be brought to the next available meeting of the Board that is due to be held at least 21 days after the notice of appeal is received by the Secretary of the BMKWT Board. The Board Members would then consider the appeal based on the written evidence already amassed in stage two, and give a final decision. A complainant would not have a right of attendance at the meeting of Board Members, unless the Board Members felt it appropriate to make such an invitation.

Unless such an appeal (stage 3) is made within 28 days of the Chair ruling at stage 2, all parties should accept and adhere to the Stage 2 ruling.

If the Chair of the BMK Waterway Trust, in consultation with at least one Board Member believes the Stage 3 appeal to be frivolous and not of a serious nature then the Chair of the BMKWT may refuse it and direct the Chair of BMKWEL to re-address the complaint. (Do we need this para?)

The Complaint procedure shall be reviewed periodically.

## **10 Personal Data Policy GDPR**

The Bedford & Milton Keynes Waterway Trust and its subsidiary Bedford & Milton Keynes Waterway Enterprise Limited (collectively known as the “Trust”) recognises the importance of the correct and lawful treatment of personal data and is committed to safeguarding the privacy of our website visitors and personal data of members and stakeholders. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation 2017 (GDPR).

The Trust will process personal data fairly and lawfully in accordance with individual’s rights.

The Trust fully endorses and adheres to the eight principles of the GDPR. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transporting and storage of personal data.

### **10.1 Purpose, Scope and Users**

The Trust strives to comply with applicable laws and regulations related to Personal Data protection. This Policy sets forth the basic principles by which the Trust processes the personal data of consumers, customers, suppliers, business partners, employees and other individuals.

This policy applies to all staff, Board members of The Trust, voluntary staff and all contractors working on behalf of The Trust, who must be familiar with this policy and comply with its terms.

### **10.2 The Principles of the GDPR**

- a) All Personal Data shall be processed fairly and lawfully, and shall not be processed unless certain conditions are met.
- b) Personal Data obtained for a specified and lawful purpose, shall not be processed in any manner incompatible with that purpose.
- c) Personal Data collected shall be adequate, relevant and not excessive for those purposes.  
The Trust shall ensure that Personal Data is accurate and shall take reasonable steps to ensure it is kept up to date.
- d) The Trust will ensure that Personal Data is not being kept for longer than is necessary for that purpose, being set out in the Data Retention Policy.
- e) All Personal Data will be processed in accordance with the data subject’s rights.
- f) All Personal Data will be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
- g) Personal Data will not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **10.3 Use of Personal Information**

The Trust will use data for the following main purposes:

- a) Communication of Member Events, Marketing Events, Consultations.
- b) Distribution of marketing information, such as, but not limited to, the following; - Newsletters, Articles, Trust Updates, Press Releases.
- c) Processing of data to analyse website usage. The usage data may include: IP address, geographical location, browser type and version, operating system, length of visit, pages viewed, number of pages viewed. The source of the usage data is the Web-hosting analytic tools, with the data being used to analyse website usage, monitoring and improving the Trust’s websites.



- d) Financial Transactions will be shared with The Trust payment service providers. The Trust's websites do not store any data related to financial transactions.

#### **10.4 Users' Rights of Access to Personal Data held by The Trust**

Personal Data held for Individuals, Members and Businesses have the following rights:

- a) To access any personal data held;
- b) To rectification of any personal data held;
- c) To erasure of any personal data held;
- d) To restrict processing of any personal data held;
- e) To object to processing of any personal data held;
- f) To request data portability to 3<sup>rd</sup> party of any personal data held that consent has been provided for;
- g) To complain to the Supervisory Authority; and
- h) To withdraw consent for use and processing of personal data.

#### **10.5 Right to request Access to Personal Data held by The Trust**

An individual may request The Trust to provide any personal information held about them. The provision of such information will be subject to: -

Provision of appropriate evidence of their identity, such as - photocopy of their passport certified by a solicitor or bank official, copy of utility bill, or similar, showing their current address, official authorisation from a senior manager/director of business.

#### **10.6 Consent**

The Personal Data held by The Trust is subject to active consent by the data subject. The consent can be revoked at any time via notification by mail, email or on-line website forms. The Trust will provide the user with the opportunity to Opt-Out of the use of their personal information for marketing purposes.

#### **10.7 Right to be forgotten**

The data subject may request that information held about them is deleted or removed and any third party who process or use that data must also comply with the request. An erasure request can only be refused if required to retain the information for compliance with a legal obligation to which The Trust is subject to in order to protect the data subject's interests.

#### **10.8 Retaining and deleting personal data**

Personal Data held by The Trust shall not be kept for longer than is necessary.

The Trust will retain and delete personal information as follows:

- a) Personal Members' Data will be retained for their duration of membership and deleted from the system 6 months after membership expires.
- b) Personal Data for purposes of Marketing Events, Newsletters, Articles, Press Releases, Consultations, will be retained as long as it is relevant and consent has not been withdrawn.
- c) Personal Data will be deleted from the database if the contact information (Postal Address, Email Address) is no longer relevant and will be actioned within a month of any notification of such personal Data becoming irrelevant.

#### **10.9 Maintaining Confidentiality**

The Trust will treat all personal information as private and confidential and will not disclose any data to anyone outside of The Trust.



All Trust Board Directors, Trustees, staff and volunteers who have access to Personal Data will be required to sign a Confidentiality Policy and a Data Protection Policy.

### **10.10 Data security**

The Trust will ensure that all personal data is kept securely and only accessed by identified individuals. No access will be allowed by 3<sup>rd</sup> Parties who are not employed by the Trust.

#### **Printed Records / Information**

- Data stored on printed paper will be kept in a secure cabinet and placed where unauthorised personnel cannot gain access to it.
- Printed data will be confidentially destroyed when it is no longer required.

#### **Electronic Records / Information**

- Electronic Records / Information will be stored via a secure server and protected by strong passwords that are changed regularly.
- Data stored on memory sticks will be locked away securely when not being used. Data will be stored on a strongly encrypted memory stick.
- Non Cloud based Data will be regularly backed up on-line using secure encrypted media
- Personal Data will not be saved directly to mobile devices such as tablets or smartphones.
- All personal computers that access The Trust's data are required to be configured with a minimum of Windows 10 or MAC OS 10.14 and protected by up to-date security software with strong firewalls.
- Personal Data records – Information will not be stored on a shared drive with only single sign-on credentials shared by multiple users; storing information on shared resources will require unique login credentials to access the data.

### **10.11 Data portability**

Upon request and validation of their identity, a data subject has the right to receive a copy of their data held by The Trust in a structured format. Requests for data will be processed within one month of receiving the request, providing there is no undue burden or does not compromise the privacy of any other individual. A data subject may also request that any data held by The Trust be transferred directly to another 3<sup>rd</sup> Party system at no additional cost.

### **10.12 Data audit and register**

Data audits to manage and mitigate risks will be carried out by a nominated member of the Board on a regular basis to inform the data register. This register will contain information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

### **10.13 Reporting breaches**

All users have an obligation to report actual or potential data protection compliance failures and/or breaches to the Board of Trustees. The Board will:

- Investigate the failure and take remedial steps if necessary.
- Maintain a register of compliance failures.
- Notify the Supervisory Authority of any compliance failures that are material either in their own right or as part of a pattern of failures.

The GDPR regulation requires all breaches be notified to the Supervisory Authority in the UK (ICO) within 72 hours of realising that a breach has taken place.

#### **10.14 Monitoring**

All volunteers must observe this policy. The Data Protection Officer has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

## **11 Policy Review:**

This policy will be subject to monitoring and periodic review. Policies are reviewed year and updated accordingly.

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## Appendix B

### Cleaning schedule

Item	Frequency of Cleaning				Precautions e.g. wear gloves or goggles	Method of cleaning
	After use	Daily	Weekly	Other		
Work surface	X				Wear gloves	<ol style="list-style-type: none"> <li>1. Remove any obvious food and dirt.</li> <li>2. Wash the surface with hot soapy water (detergent diluted according to manufacturer's instructions) to remove grease and any other food and dirt.</li> <li>3. Rinse with clean water to remove the detergent and loosened food and dirt.</li> <li>4. Apply a disinfectant. Make sure you leave it on for the contact time recommended by the manufacturer.</li> <li>5. Rinse with clean water to remove the disinfectant.</li> <li>6. Leave to dry naturally or use a clean disposable cloth.</li> </ol>
Fridge			X		Wear gloves	<ol style="list-style-type: none"> <li>1. Remove all food and store it in a cool place, ideally another fridge or cool box.</li> <li>2. Remove shelves and compartments from the fridge and wash them in hot soapy water and then disinfect. Allow to dry naturally or use a clean or disposable cloth.</li> <li>3. Wash and then disinfect all surfaces of fridge with hot soapy water and dry with a</li> </ol>

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						clean or disposable cloth.
						4. Replace shelves and compartments, and put the food back in the fridge.
						5. Clean the outside and door seals, and disinfect the handles.

## **CLEANING TERMS**

### **Detergent**

A chemical (e.g. washing-up liquid) used to remove grease, dirt and food. Used for general cleaning.

### **Disinfectant**

A chemical which kills bacteria, check that surfaces are clean of grease, dirt and food before you use a disinfectant.

### **Sanitiser**

A two-in-one product that acts as a detergent and a disinfectant. If you use a sanitiser, make sure you use it first to clean and remove grease, and then again to disinfect.

### **BS EN standards**

Disinfectants and sanitisers should meet either BS EN 13697 or BS EN 1276 standards.

### **Dilution rate**

Most cleaning chemicals are concentrated, so you need to add water to dilute them before they can be used. It is important to follow the manufacturer's instructions on how much water to use with the chemical. This is the 'dilution rate'. If you add too much or too little water, then the cleaning chemical might not work effectively.

### **Contact time**

This is how long a cleaning chemical needs to be left on the item you are cleaning. It is important to follow the manufacturer's instructions on contact time for the chemical to work effectively