



Trevanion House Holidays Ltd

Policy Manual

Last Revised : March 2009

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1. Introduction

- §1 Welcome to the Policy Manual for Trevanion House Holidays Ltd. It contains a number of statements about the way in which we operate and principles behind many of our procedures.
- §2 It is not only available to staff but also to guests, carers and anyone else who may be affected by the way in which we provide our holidays. It is available for downloading over the internet.

1.1 Philosophy Of Holiday Care

- §1 This is only a brief introduction to the way we approach the provision of holidays to our guests. Overall, we must always remember that we are dealing with *people*, each of whom is an individual, with separate needs and interests. Although labels - such as Downs Syndrome - can be a useful shorthand to describe a collection of characteristics, they must never be allowed to dictate how we deal with individual guests.
- §2 We seek to *enable* our guests to access whatever of the holiday, leisure and tourist facilities in the area they wish, recognising that to do so they will usually need some form of help to achieve their aims.
- §3 Sometimes, the help may only be in terms of providing transport and support in making decisions about appropriate activities, behaviour and clothing. In other cases, more practical support is involved, such as help with money, pushing wheelchairs, finding toilets, shops, information and so on.
- §4 We encourage our guests to build relationships as a group - the holiday is an opportunity for the guests to join with others in their enjoyment of the experience. Many come independently and, without our support, would find themselves isolated in a holiday location, unable or unwilling to make real contact with others.
- §5 Another key element of our holidays is the exercise of choice, but we always seek to ensure that guests are given *appropriate* choices - that is, a range of options that they can understand and can cope with. Again, that degree of choice will be very much an individual matter. However, we also seek to put across the need to be aware of other people in the group so that choices - such as where to go for the day - have to be made collectively, each recognising the interests of the others.
- §6 We seek to be both *educational* as well as *fun*. Some of our guests have no previous experience of independent holidays before coming to us for the first time. Others perhaps come from an institutional environment or a domestic situation that leaves them little freedom. They all need carefully chosen care and support.

1.2 Structure of this Manual

- §1 This manual contains the policies and other important statements about the way in which Trevanion House intends to operate. Staff are expected to be familiar with all parts of this document and, where appropriate, to act responsibly in their implementation.
- §2 The contents are reviewed regularly, at least once a year, and in the light of changes to legislation, care standards and best professional guidance.
- §3 Staff are invited to comment on any part of this document and may expect that their views will be heard before any decision is taken with regard to changes.
- §4 Many of the sections in this manual relate to requirements listed with the Care Standards and the following section provides a cross reference.
- §5 Throughout this document the *Commission for Social Care Inspection* is referred to as CSCI and their local office is at:

Unit D1, Linhay Business Park, Ashburton, Devon, TQ13 7UP

1.3 Code of Practice

- §1 The Codes of Practice (Issued May 2005) for Social Care Workers and their Employers, prepared by the General Social Care Council have been adopted by Trevanion House and their staff are expected to act in accordance with the statements therein.

2. Cross Reference to Care Standards

Title	Checklist	Standard	Where defined	Last updated
Prevention of abuse	Yes	Yes	PM9	
Aggression towards staff	Yes	Yes	PM16	
Accidents	Yes	No	SH9	
Quality Assurance Plan	Yes	Yes		
Missing Guests	Yes	Yes	SH10	
Bullying	Yes	Yes	PM10	
Communicable diseases	Yes	Yes	<i>follow RIDDOR</i>	
Complaint procedure	Yes	Yes	PM4	
Confidentiality	Yes	Yes	PM5	
COSHH	Yes	Yes	SH13	
Medication	Yes	Yes	PM8 / SH8	
Code of Conduct	Yes	No	SH4	
Early departure	Yes	Yes	TC	
Disposal of Clinical Waste	Yes	No	Use registered contractor	
Death of guest	Yes	No	SH19	
Emergency admission	Yes	Yes	<i>not applicable</i>	
Emergencies	Yes	Yes		
Equal opportunities	Yes	Yes	PM14	
Fire procedure	Yes	Yes	SH11	
Food hygiene	Yes	Yes	PM7.1.4	
First Aid	Yes	No		
Gifts to staff	Yes	No	SH4	
Healthy and Safety	Yes	Yes	Staff Handbook	
Lifting of guests	Yes	No	PM16	
Guest Bank	Yes	Yes	PM9.1.1	
Nursing	Yes	Yes	<i>not provided</i>	
Physical intervention	Yes	Yes	PM9.1.3	
Racial harassment	Yes	Yes	PM14	
Record keeping and access to files	Yes	Yes	PM6	

Title	Checklist	Standard	Where defined	Last updated
Contract of Employment	Yes	Yes	SH3	
Care Support and Assessment	Yes	Yes	SH7	
Risk assessment	Yes	Yes	PM7	
Sexuality	Yes	Yes	PM9.1.4	
Smoking, alcohol, drugs	Yes	Yes	SH4	
Disciplinary procedures	Yes	Yes	SH3	
Staff supervision	Yes	No	SH5.1	
Training	No	Yes	PM12	
Privacy, Choice, Rights	Yes	No	PM3.18	
Whistleblowing	Yes	Yes	PM9.2	
Volunteers	Yes	Yes	<i>not applicable</i>	
Criminal Records Bureau	No	No	PM11	

In the above references:

PM refers to this document

SH refers to the internal Staff Handbook

TC refers to our standard Terms and Conditions

The column **Standard** indicates those items listed in Appendix 3 of the Care Standard.

3. Statement of Purpose

§1 Trevanion House Holidays Ltd provides holidays for adults with a learning disability and a small amount of day care for local adults with a learning disability. Adults with a learning disability who are over retirement age may use the facilities at Trevanion House if, following assessment, it is determined that the accommodation, activities, care support and general ethos are appropriate.

3.1 Registered Provider and Manager

Registered Provider:

Trevanion House Holidays Ltd
M J Todd, Chairman
Trevanion House
Trevanion Road
Wadebridge
Cornwall PL27 7PA

Responsible Person:

Christine Mary Todd

Registered Care Manager:

Tracey Barrett

General Manager:

Gerald Ward

3.2 Experience and Qualifications

M J Todd

BA (Hons) Maths and Physics, Keele University (1967)
PhD, Loughborough University (1970)

Founding Company Secretary North Tyneside Abbeyfield Society
Local Councillor and Member of Social Services Committee
Founding Chairman Milton Keynes Home for Young People
Board Member Milton Keynes Community Trust
Joint Proprietor, Trevanion House, 1991 - present

C M Todd

BA (Hons) English and Political Institutions, Keele University (1966)
Certificate in Education, Keele University (1966)

Teacher 1966 - 1984 (Various schools)
Lecturer in Further Education, Special Needs and Social Care,
Milton Keynes College of Further Education, 1984 - 1991
Joint Proprietor, Trevanion House, 1991 - present

T Barrett

Access to Social Work and Social Care
Registered Managers Award, St Austell College (2006)
NVQ Level 4 - Health and Social Care, St Austell College (2008)

22 years experience working with adults with a learning disability, 11 years as a manager both in Domiciliary Care and Registered Manager for Residential Care.
Operations Manager for Hampshire & Dorset overseeing provision of services.

3.3 Staff

- §1 Staff numbers vary seasonally, according to numbers of guests. During the season, typically 30 staff are employed in various combinations of categories. A proportion of staff are retained on a permanent basis.
- §2 All staff are required to undertake Common Induction Standards training and have regular updates. Trevanion House places considerable emphasis on on-the-job training and actively encourages routine discussion of individual cases both to explore the needs of individual guests and to develop understanding of the basic principles involved.
- §3 Training needs are reviewed routinely at each management meeting and further training and courses are accessed as required and when available.
- §4 Staff are actively encouraged to achieve vocational qualifications relating to their work and experience and the majority of permanent staff have qualifications at least equivalent to NVQ Level 2. Records are kept of all training which staff undertake. A list of all current staff, their qualifications and training, is held on our computer administration system and is available on request.

3.4 Organisational Structure

- §1 Trevanion House Holidays Ltd is the Registered Provider. MJ and CM Todd, former proprietors of Trevanion House, are Directors, Chairman and Company Secretary, respectively. A Board of Management, which additionally includes the Care Manager and the Holiday Manager, oversees the operation of Trevanion House. CM Todd has oversight of the TRACS Day Service (not part of this Statement of Purpose)
- §2 G Ward (General Manager/Director) reports to the joint proprietors and is fully responsible for the day-to-day operation of Trevanion House. He is a director of THHL.
- §3 T Barrett (Care Manager/Assistant General Manager) has full professional responsibility for all matters which arise from the registration of Trevanion House by CSCI, in which context she is the *Registered Manager*.
- §4 M Kerr (Holiday Manager) also reports to the General Manager but has full professional responsibility for the Holiday Programme.
- §5 Staff are provided with a detailed organisational chart and a copy is issued for inclusion in the Staff Folder which is updated at least annually and is otherwise available on request.

3.5 Age and Sex of Service Users

§1 Guests visiting Trevanion House and in need of registered care provision must be at least 18 (including those over 65), unless their normal carer supports an assessment that a holiday in an adult environment is appropriate. Children under 18 would not normally be considered unless accompanied by a carer or adult family member, or who fall outside the scope of the CSCI registration. Guests may be either male or female. There is no upper age limit, but all guests must be capable of participating in the holiday programme which involves outings by minibus each day. Tail lifts are not provided in the minibuses although guests with limited mobility are accepted.

3.6 Range of Care Needs

- §1 Trevanion House provides holidays for adults with a learning disability. Guests usually stay for either one or two weeks at a time, many returning for holidays year on year.
- §2 The holiday programme involves daily outings, with transport and support staff provided, to destinations of the guests' collective choice. When full, three minibuses operate, giving guests choice each day.
- §3 Trevanion House seeks to ensure that guests are given practical support throughout the holiday to demonstrate and maintain basic Literacy, Numeracy and Social Skills
- §4 Most guests come on holiday independently although some need escorting on travel by public transport. Those with greater care needs may be accompanied throughout their holiday by their usual carer(s).
- §5 In borderline cases, guests new to Trevanion House are encouraged to come with a carer on their first visit, with the aim of gaining sufficient independence to come on their own in the future.
- §6 Not all of the guests at Trevanion House are covered by the CSCI registration although all receive the same service provision. Those arranging holidays for guests who are covered by this registration should recognise that Trevanion House cannot impose the same restrictions on guests not covered by registration, in particular regarding the way in which they handle their own medication.

3.7 Nursing Care

§1 No nursing care is provided by Trevanion House staff. If specific nursing needs are identified, such as insulin injections, dressing changes, these must be arranged with the local Health Centre on behalf of each guest prior to arrival. The guests or their usual carers are responsible for making these arrangements.

3.8 Admission Criteria

- §1 Trevanion House provides holidays for people with learning disabilities. A substantial majority come unaccompanied and are therefore expected to be reasonably independent in terms of personal care.
- §2 About a third of those guests who come unaccompanied need some degree of assistance with their personal care. The degree of help is assessed in discussion, usually by telephone, with the carer or other person responsible for making the booking. The Registered Manager has overall responsibility for the assessment of care needs and whether individuals fall within the scope of CSCI registration.
- §3 Guests with mobility problems are accepted provided that they can load bear and, with assistance, access the minibuses which have an additional step. A proportion of guests each week are accepted who need to use a wheelchair when outside the hotel. Normally, guests should bring their own wheelchair. Locally-hired wheelchairs may be ordered prior to the holiday and a supplementary charge will be included in the Holiday Account. Trevanion House does not supply wheelchairs.
- §4 Guests who are accompanied by carers are not fully assessed other than to determine that they can fit into the normal holiday programme. Their carers are expected to provide whatever personal care support is required.
- §5 Trevanion House does not accept guests with seriously disruptive behaviour that will impact on the quality of the holiday for other guests. Trevanion House reserves the right to terminate a holiday if it transpires that an inappropriate booking has been made due to the failure to disclose relevant information prior to the start of the holiday.

3.9 Social Activities

- §1 Guests normally visit Trevanion House for either one or two weeks at a time, Thursday to Thursday. After the evening meal on the day of arrival, an introductory meeting is held for all guests. Ideas for possible activities are discussed with guests using an interactive projector display, from which a choice of outings for each of the first three days is compiled. Guests then choose which trip to take.
- §2 A further meeting is held on Monday morning to plan for the remainder of the week.
- §3 The plans are reviewed in the light of changing circumstances, such as inappropriate weather conditions.
- §4 Guests are free to suggest any holiday or leisure activity within Cornwall, although advice is given if something is proposed which is either not considered good value or is age inappropriate. The selection of activities involves a degree of group consensus.
- §5 Guests have the opportunity to access local community events and facilities, such as pubs and the cinema.

3.10 Consultation

§1 As outlined above, guests are fully involved in the selection of activities for the daily programme. Obviously, it is not practical to consult over longer term issues about the operation of the holidays although general feedback is used to review procedures on a continuous basis. A report on the guest surveys from the previous season is displayed on our web site.

3.11 Fire Precautions

§1 Trevanion House is fitted with all required fire precautions. The system is tested weekly and records are duly kept. All staff are required to attend fire training every six months. Staff undertaking sleeping-in duties are trained every three months.

§2 Guests are routinely shown the fire exits when they first arrive, together with a demonstration of the emergency telephone system.

§3 It is not considered appropriate to hold fire drills with guests.

3.12 Religious Services

§1 At the Thursday meeting guests are asked if they wish to attend a local church and arrangements are made to accompany them if requested.

§2 There are only facilities for Christian worship in the locality - others faiths and religions have limited facilities in Cornwall, although every effort will be made to support guest's needs within the community.

3.13 Contact with Families, Friends and Representatives

§1 The principal links between the guest and their family or carers are

postcards

telephone/mobiles

holiday diary

§2 Each Monday morning there is a session at which staff assist guests to send postcards. The degree of support depends on the individual guest's ability and ranges from writing the card through to general support about what to say. In each case every guest makes some positive contribution, at least signing their name or making their mark.

§3 A pay phone is provided and guests may receive incoming calls either at that extension or in their own room whichever is more convenient. Staff are available to help guests place calls if needed.

§4 On rare occasions, family or friends are in the local area and arrangements are made, if requested, for them to meet the guests at Trevanion House in the manner normally available at any hotel. Family and friends are welcome to join with guests for the evening meal provided that advance notice is given. A charge will be made.

§5 At the end of each week a Holiday Diary is provided which contains descriptions of each day's activities and highlights from them. The diary also includes numerous photographs which are taken during the holiday with digital cameras provided by Trevanion House. Guests also have the option of purchasing a copy of the diary printed in full colour which is sent through the post in the following week.

3.14 Complaints

§1 At the Introductory Meeting on Thursday evening, guests are advised on the range of problems they may wish to raise with staff, including any failure with facilities provided in their room or elsewhere at Trevanion House. These are dealt with expeditiously.

§2 A complaints procedure is set out in the Terms and Conditions which are printed on every Booking Form and the person making each booking signs a confirmation that they accept these Terms and Conditions.

§3 Any complaint which cannot be settled quickly may be referred to CSCI and Department of Adult Social Care, Cornwall County Council, as appropriate, so that they are fully informed in the event that the matter is raised through them. CSCI are primarily concerned about complaints regarding Care Standards or incidents of Abuse.

§4 Complaints which concern matters covered by the Care Standards Act are referred to CSCI and any other matters arising from the care provision are referred to the Department of Adult Social Care.

§5 All complaints are logged to record the dates on which they are received, what action is taken and when, together with any correspondence relating to the complaint.

§6 A fuller statement about complaints is made in Section 4 of the Policy Manual.

3.15 Review of Guests Needs

- §1 Once a booking is received, or sometimes at an earlier stage, the Care Manager makes an assessment based on information available of the likely degree of care need.
- §2 For those who are largely independent a simple Care Support Form is issued to the person making the booking. This requests the least amount of information considered necessary, on the basis that the privacy of the guest should not be impacted by asking for information unrelated to their holiday.
- §3 Other guests are sent a longer assessment form which is reviewed by the Care Manager when returned completed. In the event of any uncertainty in how to meet the guest's needs then a follow-up telephone call is made (by or on behalf of the Registered Manager) to the person making the booking and the records adjusted to show any additional information as necessary.
- §4 At the end of the holiday the information received is reviewed and a summary is kept on the computerised Administration System which can then be easily accessed if a further booking is made for the guest. It is not unusual for a guest to return after a break of several years and for their normal carers to expect the profile of the guest to be remembered. Care has to be taken to ensure that up-to-date information is still requested.
- §5 A new medication record is always requested, even if the guest is returning more than once in each year.

3.16 Rooms

- §1 Trevanion House has sixteen guest bedrooms, single and twin as set out below:

Room 1:	Single	16.2 sq m, including en suite bathroom
Room 2:	Single	12.5 sq m, including en suite bathroom
Room 3:	Single	10.7 sq m, including en suite bathroom
Room 4:	Shared	24.0 sq m, including en suite bathroom
Room 5:	Shared	16.3 sq m, including en suite bathroom
Room 6:	Single	13.0 sq m, including en suite bathroom
Room 7:	Shared	13.9 sq m, including en suite bathroom
Room 8:	Single	15.6 sq m, including en suite bathroom
Room 9:	Single	13.9 sq m, including en suite bathroom
Room 10:	Single	10.5 sq m, including shared bathroom
Room 11:	Shared	11.6 sq m, including shared bathroom
Room 12:	Shared	19.0 sq m, including en suite bathroom
Room 13:	Shared	24.5 sq m, including en suite bathroom
Room 14:	Shared	19.0 sq m, including en suite bathroom
Room 15:	Shared	24.5 sq m, including en suite bathroom
Room 16:	Single	12.9 sq m, including ensuite bathroom

Note that rooms 10 and 11 form a somewhat separate unit with washbasins in the rooms and a shared bathroom.

§2 It is Trevanion House policy that only guests coming on holiday together may share a room. The decision about whether room sharing is desired and appropriate is left entirely to the person making the booking.

3.17 Therapeutic Techniques

§1 In the context of a holiday, no therapeutic techniques are used.

3.18 Privacy and Dignity of Guests

§1 The most important principle guiding the provision of holidays at Trevanion House is to maximise the extent to which the experience is like that of anyone else visiting Cornwall and staying in a small guest house or hotel. Guests are given as many opportunities as possible to express their wishes about the content of the holiday, within the context of a group consensus. Within each activity there is a chance to express choice. Self advocacy is actively promoted.

§2 Only information necessary for meeting needs during the holiday is requested and, as far as possible, the responsibility for providing appropriate and sufficient information lies with the person making the booking. The Care Manager will seek to check the validity of that information as far as possible.

§3 A Guest Bank facility is provided. Guests may choose to deposit their spending money at the start of the visit. Each morning there is an opportunity to take out sufficient for the day. This provides staff with a discreet means of monitoring expenditure and ensuring that they do not run into budgetary difficulties during the holiday. Guests are encouraged to put money for an unaccompanied return journey to one side. This money is recorded separately and returned to the guest on their departure. Guests not using this facility are required to make a deposit when they arrive to cover any drinks and other charges they may order during their holiday.

§4 Personal care, when needed, is given in each guest's own bedroom. All staff involved in giving personal care are trained to understand and implement policies on privacy and dignity. There is a policy on confidentiality which all staff understand. All guest records are kept under supervision in an area where guests are not permitted. Security provisions on the computer system ensure that only authorised staff are able to access these records.

§5 All rooms have keys which guests may use when they are not in their rooms. The rooms may be locked from the inside when occupied although staff have access to a master key at all times for reasons of safety and in order to clean and maintain the rooms. Guests are asked to leave their keys with the Front Desk when they are away from Trevanion House.

§6 Whilst guests are clearly entitled to visit each other in the privacy of their bedrooms, this may be actively discouraged by staff where it appears to be inappropriate.

§7 All guests are supported in issues arising from inter-personal behaviour between them and other guests. Trevanion House has a positive approach to encouraging and enabling guests to take responsibility for resolving and evolving their personal relationships.

3.19 Availability of Policies

§1 Trevanion House Policies, Statements and Codes Of Practice are normally available through the web site (www.trevanion.co.uk) and may be downloaded in Adobe Acrobat format. Printed copies are available on request.

§2 The relevant standard for Trevanion House is *Care Homes For Younger Adults and Adult Placements*, published by The Stationery Office, 2002 ISBN 0 11 322428 1

4. Concerns and Complaints

§1 Our standard Terms and Conditions state:

*“10. **Complaints** If you have any complaint whilst on holiday, you must tell us immediately. We are usually able to solve most problems on the spot. If the matter remains unresolved to your satisfaction, we will arrange for you to complete a report at that time and, where it involves any matters covered by the Registered Care Homes Act, a copy will be forwarded to the local office of the Commission for Social Care Inspection (01364 - 651800). A copy may be forwarded to the Department of Adult Social Care, Cornwall County Council, especially if it concerns matters of abuse. If you wish to pursue your complaint after the end of your holiday, you must write to us within 14 days of your departure from us, setting out the details of your complaint. We will investigate and undertake to respond within 14 days of receipt of your letter.”*

§2 Each day there is a designated Duty Manager, whose name is posted on the main notice board for guests. Guests are encouraged to raise any concerns or complaints with the Duty Manager at the earliest possible opportunity. Whenever possible, the matter will be addressed quickly, taking into account the need to ensure that each guest is able to continue and enjoy their holiday.

§3 Guests and their carers are advised that they can directly contact CSCI (*address is given in Section 1.2*) at any time regarding serious concerns relating to any matters arising from the Care Standards Act. We are committed to providing CSCI with any information which will enable them to investigate any such referrals.

§4 Where it is appropriate, especially in matters which fall outside the scope of the Care Standards Act, we will inform the Department of Adult Social Care, Cornwall County Council.

§5 We make every effort firstly to ensure that the quality of our service is fully maintained at all times. Senior staff are given the responsibility of assisting in monitoring standards on a routine basis.

§6 However, a large part of our work varies considerably from week to week, guest to guest and we believe that central to maintaining standards is to ensure that all staff understand the principles on which we operate so that they are able to adapt to these changing circumstances.

§7 Trevanion House is operated on an open basis and carers or families are always welcome to visit, either when the guest is staying with us, or at other times.

§8 All senior staff work closely with guests and are thus able to detect any early indications of issues that might otherwise lead to complaints.

§9 Whilst a formal procedure to access local advocacy services is not appropriate for guests at Trevanion House, we would expect to make reasonable efforts to ensure that any guest wishing to make a complaint is enabled to do so in a manner consistent with their abilities.

§10 During each Saturday evening and Wednesday morning Briefing Meeting, guests are positively asked to mention to staff any problems they are having with their rooms or any other aspect of the holiday.

5. Confidentiality

- §1 Trevanion House has adopted the following principles regarding confidentiality of information about guests:
- §2 Information requested from guests or their carers will be kept to a minimum consistent with the need to ensure that appropriate care is given. Soliciting unnecessary information can be intrusive and an invasion of privacy.
- §3 All information received which concerns guests shall be treated as confidential to Trevanion House. It may be shared between staff who need the information in order to provide appropriate care.
- §4 Any disclosure of information received by a member of staff shall be passed to the appropriate Duty Care Manager who will decide on any necessary action. In the event that a guest initiates a conversation about personal details, the member of staff involved shall make it clear to the guest that the information will be shared with Trevanion House.
- §5 Trevanion House uses a computer system for administration and is registered with the Data Protection Registrar for that purpose. Any information held in Trevanion House records, whether or not on computer, is subject to that registration and shall not be systematically supplied to a third party for purposes other than that covered by the registration.
- §6 Information covered by this policy shall include, but is not limited to:
- medical and disability conditions
 - medication
 - previous personal history
 - home address or other contact data
 - financial information
 - whether or not a guest has booked a holiday or when
 - details of specific incidents whilst on holiday
 - current social worker or other support professionals
- Staff should be careful to ask permission from each guest on any occasion in which they are asked for contact details or any other information covered by this policy.
- §7 Any serious breach of confidentiality by a member of staff will result in appropriate disciplinary action.
- §8 No sensitive confidential information will be divulged to third parties without permission from the person concerned unless authorised by a Proprietor or Care Manager. Such authorisation will take into account legal and statutory duties of Trevanion House as well as the perceived best interests of the guest concerned.

6. Record Keeping

§1 Records concerning the operation of Trevanion House are contained in:

Admin Computer System

Bookings

Financial Accounts

Addresses

Care summaries

Photographs/Diary

Guest Accounts

Personal care

Medication Records

Guest Registration Information

Care Support Forms

Guest Bank Records

Staff Employment Records

Accident and Incident Reports

Risk assessments

Equipment and Installation Tests

Minibus trips and servicing

Menus, diets and food served

Communication Folder

Day-to-day information concerning guest care

Repairs and maintenance

§2 All of the information held in records by Trevanion House is subject to our Policy on Confidentiality and the use is registered with the Data Protection Register

§3 All staff may have access to information on guests as determined by their specific duties.

§4 Guests or their carers are entitled to receive a copy of any information about them held by Trevanion House, on payment of the appropriate administration fee, under the Data Protection Act regulations. They are also entitled to ask for any errors to be corrected.

7. Risk Assessment

§1 This Risk Assessment covers the operation of Trevanion House Holidays Ltd. The principal activity is the provision of holidays for adults with a learning disability. Since Trevanion House is registered with the CSCI, there is a duty of care towards the guests as well as the responsibilities of the employer to its staff.

§2 The risks which are considered fall into the following categories:

risks to staff

risks to guests

risks of guests to staff

7.1 Risks to Staff

§1 The main areas of activity by staff fall into the following categories:

care of guests

food preparation

housekeeping

administration

7.1.1 Physical Design

§1 In general, Trevanion House has been designed to minimise risk to staff and guests. All areas are fully covered by up-to-date fire safety equipment and detection systems. An internal telephone system gives additional security, enabling staff to summon assistance easily.

§2 Outside areas have also been considered and all of the main access routes were upgraded in 1998 with extensive use of paved surfaces and well-graded slopes. Steps have been kept to a minimum consistent with the terrain levels.

§3 Delivery access has also been improved to eliminate the need to carry heavy goods down steps from delivery vehicles into the house.

§4 The main staircase and the fire escape staircase have been provided with handrails on both walls to improve safe use.

§5 The garden has a large water feature comprising two linked ponds. The upper pond is naturally protected by a raised wall and the lower pond has a 300mm minimum low wall/border to ensure that guests do not inadvertently walk into the water. Both ponds are constructed with shallow shelves around the outside. It is not considered that this feature offers any significant risk.

§6 Some doors to various rooms where staff and guests frequently negotiate wheelchairs and other mobility issues, have been fitted with Dorguard release mechanisms in order to avoid the temptation to use wedges. These mechanisms have been agreed by the Fire Officer.

7.1.2 Lifting

§1 Staff are not required to lift any items of abnormal weight. Specific guidance is given on the manual handling of guests. (See Section 16) Other guidance is given in the Health and Safety Section of the Staff Handbook.

§2 The heaviest items are goods delivered by suppliers. Only competent suppliers are employed and, in general, their staff are required to deliver items onto the premises. A level access route is available to reduce the risk associated with lifting items on delivery.

7.1.3 Care of Guests

§1 The work of staff in caring for guests is largely very low risk, although the special case of actions by guests against staff is considered later.

driving

use of recreational facilities

§2 Staff who are required to drive the minibuses must have an appropriate driving licence, with no recent convictions, and must meet all necessary conditions for insurance. It is not necessary for drivers to hold licences other than normal car licences but a short induction/training session is given to those who have no previous experience with minibuses and refreshed at the start of each season.

§3 The main activity of the staff escorting guests is in helping them access the full range of holiday and recreational facilities available in the county. It is assumed that the operators of such facilities have taken reasonable precautions regarding the safety of their visitors and that no special instructions need be given to Trevanion House staff. No use is made of adventure style centres offering rock climbing, canoeing or similar activities which require special licences from local authorities.

§4 Minibuses are equipped with basic first aid kits. They also carry mobile phones to enable staff to summon assistance or to seek advice in the event that they encounter a situation which falls outside their competence to deal with.

§5 The electrical installation of the hotel is equipped with sensitive detectors to reduce significantly the risk of harm in the event of electric shock or faulty equipment. The electrical installation is checked every five years, gas installations are checked annually and certificates obtained from competent testers.

§6 Corridors and other general circulation areas are generally kept free from anything reasonably likely to cause staff or guests to trip.

7.1.4 Food Preparation

- §1 Staff involved in food preparation all hold Basic Food Hygiene Certificates, or are enabled to undertake that qualification as soon as possible after entering employment with Trevanion House.
- §2 No equipment is used that requires special training nor is any restricted to staff over a given age. A domestic meat slicer is used but use is restricted to designated cooks.
- §3 The kitchen layout was professionally undertaken when originally installed and every effort is made to keep up with current requirements. The local Environmental Health Officer is regularly consulted.
- §4 Fridge and freezer temperatures are recorded twice daily. A cleaning schedule is in place covering the kitchen and food store. A record is kept of all routine cleaning tasks undertaken.
- §5 Frozen food is delivered by a competent supplier who is responsible for ensuring the temperature on loading onto the delivery vehicle and when off-loaded is in accordance with needs of the particular goods being delivered.

7.1.5 Housekeeping

- §1 No equipment is used other than of a domestic standard - no large scale floor polishers are used. The range of cleaning materials is deliberately restricted to those recommended by a competent specialist supplier who also provides COSHH sheets. Wherever possible, the substance Deep Clean is used to minimise the range of materials.
- §2 There are no particularly high ceilings or other places that require routine cleaning or maintenance. Particular care is taken with the replacement of light bulbs.

7.1.6 Administration

- §1 The main area of potential concern is the use of Personal Computer monitors. Any member of staff who regularly uses a computer screen for significant periods each day is entitled to an annual eye test.
- §2 As far as possible, basic recommendations for the size, height and arrangement of office equipment are followed.

7.2 Risks To Guests

- §1 A principal philosophy of Trevanion House is to maximise the opportunities of guests to exercise their independence, supported by staff only when and where needed.
- §2 Consequently, it is important that the areas of support, especially where they relate to physical safety, are clearly identified before a guest arrives. A scheme of care

assessment is in place which depends inherently on the integrity of the person making the booking. Such needs are qualified as soon as possible after the guests arrive by the Care Manager or proprietors. Any needs affecting safety are communicated in normal briefings to all staff in a care capacity.

- §3 However, it is important to recognise that the basic philosophy does not aim to remove all risk of physical injury but, rather, to maintain that risk at a level consistent with other people in the population at large. Guests are therefore free to act in ways which might cause themselves injury but are protected by the care regime whenever they are incapable of judging the level of risk or of protecting themselves.
- §4 All of the tourist facilities used are open to the general public and it is assumed that they meet all normal safety requirements. In general, however, all of the facilities are familiar to Trevanion House before guests' visit. If a new facility is visited, then it is usual to do so with a low risk group on the first occasion.

7.3 Risks Of Guests To Staff

- §1 The risks that guests impose on staff fall into the following categories:

- lifting and falling
- challenging behaviour

- §2 Guidance notes on both of these aspects are given to all staff (see Section 16 and Section 9.1.3) as well as being included in the induction training given to seasonal staff when they commence employment.
- §3 Although there is only a low risk of infection of staff by guests, protective gloves and aprons are available to care staff when undertaking personal care.

8. Medication

- §1 Guests staying at Trevanion House normally arrive with their medication dispensed at home. We are unable to control the format and packaging of the medication as it arrives and it is our practice:
- §2 To use only our own medication recording system, to reduce likelihood of confusion in operation. Any record sheets arriving with the guest are returned as received, together with the copy of our medication record. Guests are encouraged to bring with them any repeat prescription they hold for regular medication, to assist in resolving any difficulties during the holiday
- §3 In the case of medication already dispensed into formats such as Boots MDS or Nomad boxes, these are used as supplied.
- §4 In the case of medication which arrives other than in a suitable format, we are no longer allowed to undertake secondary dispensing and it is therefore kept in the form supplied. This generally involves more staff time and higher levels of risk and is to be discouraged. We reserve the right to decline to hold medication supplied in a form that does not meet minimum safety standards or to make an additional charge.
- §5 Before guests arrive at Trevanion House the Care Support form will have indicated whether or not they wish to self-medicate. As far as possible this assessment is respected. However, if a guest subsequently asks us to hold their medication then we will do so, using our standard procedures. We accept no responsibility for those who self medicate but we still need to know, in case of emergency, what medication which the guest is taking.
- §6 The Care Support forms which are completed by the guest or their carer in advance of the holiday should indicate whether regular or occasional medication is being taken, the pattern and quantities. Unless arrangements are made with the Care Manager in advance of the holiday, Trevanion House can only undertake to assist with medication at the times indicated on the documentation sent to carers.
- §7 Two weeks before the start of the holiday, the Care Manager sends out a Despatch Note which lists the information previously supplied. Guests or their carers are asked to ensure that this accompanies medication on arrival at Trevanion House and is marked with the actual quantities brought. It is important that this form is signed by the person responsible for ensuring that the guest travels with appropriate medication.
- §8 On arrival, the medication details are checked and tablets counted against the pre-supplied information, the containers and any other listing which may have been supplied. Any inconsistencies are followed up as soon as possible with the usual carers, although in some cases it is necessary to respect statements made by the guests themselves about when medication is to be taken. Trevanion House takes no responsibility for determining the suitability of medication for particular guests.
- §9 Trevanion House does not offer to handle controlled drugs. In the unlikely event that this matter may arise, guests or their usual carers would be asked to make

arrangements with the local health centre for the administration. A similar situation operates when guests need medication to be administered by injection or other procedures that amount to nursing care including changing medical dressings.

- §10 Trevanion House cannot supply medication. As a result, we do not provide over-the-counter medication but guests are enabled to visit a local pharmacy to make their own purchases who are able to give appropriate advice.
- §11 All unused medication is returned with the guest at the end of their stay. A record is kept of the quantities received, used and returned.
- §12 Staff who are involved in the handling of medication on behalf of guests are instructed in this policy and in the practices to be followed. Each administration of medication is recorded, including PRN doses., using a computer based medication recording system.
- §13 In the rare event that medication is not given in accordance with the stated pattern, staff are strictly instructed to record the actual administration, under clear guidance that this is important in the event of any investigation or sudden illness of the guest.
- §14 Staff are advised to deal with one guest at a time, set out the medication in appropriate containers, give to the guest and to complete the recording before moving on to another guest. It is a general policy that all guests should actually take the medication themselves. As some medication is given with meals, it is not always possible to ensure that medication is given in private. However, staff are expected to act within the general guidelines of dignity and privacy when handling medication. Our policy on confidentiality applies to medication details.
- §15 The procedures adopted by Trevanion House for the handling of medication have been drawn up under guidance from the CSCI pharmacist, supported by advice from the local pharmacist. They are reviewed from time-to-time as deemed appropriate.
- §16 Trevanion House provides lockable storage in each bedroom and guests are encouraged to place any medication which they hold in this facility, both for their own security and for the safety of other guests.
- §17 Whilst we seek to ensure that staff have access to up-to-date information about particular medicines, we cannot be responsible for the suitability of the regime or its consequences. In the event that a guest seeks information which is needed for their safety during the holiday, arrangements would be made for them to see a local GP at the nearest health centre.
- §18 In the unlikely event that a guest appears to be reacting adversely to medication, we would normally seek advice from the contacts listed on Care Support forms. If this is not possible, or in an emergency, arrangements would be made to see a GP at the nearest local health centre.
- §19 Under no circumstances can we alter the form of medication from that supplied by the manufacturers. In particular, pill crushing and breaking of pills into portions are strictly forbidden unless specifically designed for this purpose and so indicated on the original packaging or with the written consent of the prescribing physician and the guest.

§20 Trevanion House is unable to give medical advice to guests.

9. Dealing With Abuse

- §1 Trevanion House recognises the importance of ensuring that its guests do not suffer abuse whilst staying with us.
- §2 In the context of a holiday lasting one or two weeks, systematic and extended abuse is not an issue. The extent to which guests return to Trevanion House for successive holidays is an indication of satisfaction with the hospitality and care given, but management and staff should not be complacent.
- §3 Guests may reveal abuse from their home environment. This must be taken seriously and dealt with under the procedures laid down for Alerter's, as set out in the Cornwall Alerter's Guide.
- §4 Trevanion House affirms its recognition of the importance of working within the guidelines in the Department of Health *No Secrets* document, the Cornwall Multi-Agency Code of Practice with the Alerter's Guidance for the Protection of Vulnerable Adults. Reference is also made to *Safeguarding Adults*, the national framework for standards in adult protection work. This section should be read in conjunction with Section 10 of this Policy Manual on *Bullying*.
- §5 All staff at a Senior level and above will be given an opportunity to attend the Cornwall Multi-Agency course *No Secrets* or its equivalent.

9.1 Contexts of Abuse

9.1.1 Handling Guest Monies

- §1 Full records are kept of money received and returned and, as far as possible, all transactions take place in a public context, although guest privacy must be respected.
- §2 A copy of the Guest Registration Form is returned at the end of the holiday in an envelope containing all relevant documentation for each guest. The detailed Guest Bank records are kept and are available for inspection. Whenever practical, guests are asked to initial (or make some other mark) for each transaction. However, we do not keep records of guest's personal expenditure with third parties especially when on excursions outside Trevanion House.
- §3 Staff are actively encouraged to deter guests from buying them gifts or refreshments. However, it is not always possible to avoid such situations and we seek to ensure that guests are not emotionally disappointed by our reaction. Anything other than an item of minimal cost would be returned sensitively and normal carers advised if possible. More detailed guidance is given in the Staff Handbook.

9.1.2 Personal Care

- §1 No guest is likely to receive personal care from just one member of staff during their holiday. All staff are trained in issues of privacy, dignity and effective personal care. There is no restriction on members of staff giving personal care to guests of the

opposite sex, but guests may make a request for a member of staff of a particular gender to undertake specific or all of their personal care. This can only be guaranteed if made in advance of the holiday. Additionally, it cannot be guaranteed that both female and male staff will be available when guests are out on trips away from Trevanion House.

9.1.3 Other Guests

- §1 It is not possible to monitor the activities of all guests at all times. The risk exists that one guest may enter another guest's room in order to pursue some form of abuse.
- §2 Guests are discouraged from entering other rooms unless invited. This is mentioned at the Welcome Meeting for all guests. Any such action, if it comes to the attention of staff, is normally followed up to ensure that genuine agreement is involved.
- §3 Occasionally, there is low-level violence between guests. This cannot be prevented although every effort is made to ensure that potential trigger points or violent outbursts are avoided, although we are dependent on the accuracy of care support information supplied prior to arrival.
- §4 If such violence occurs then staff actively intervene, with the principle of enabling guests to act or speak for themselves being paramount.
- §5 Guests who subject other guests or staff to violent attack may be physically restrained. Police assistance may be sought but, in circumstances of serious and immediate danger, staff with suitable training are permitted to use their discretion on whether to intervene until assistance is available. This will be done in accordance with best advice on restraints and for the minimum amount of time required to deal with the immediate situation.
- §6 Non-physical abuse between guests is also possible but occurs infrequently. Staff are trained to promote self-advocacy and independence for our guests and will seek to ensure a positive resolution of any personality clash between guests that may occur. Racial or sexist harassment, attitudes or discrimination may require particular attention and staff will make it clear that these are not tolerated.

9.1.4 Sexual and Intimate Behaviour

- §1 For all adults, holidays are times when relationships may develop with intensity. We seek neither to encourage nor discourage intimate behaviour in such situations but will endeavour to ensure that there is proper consent from both parties.
- §2 We strongly endorse the right of adults with a learning disability to form relationships of their choice which may extend to sexual activity.
- §3 In appropriate circumstances there is no prejudice against guests sharing a room or engaging in sexual activity.
- §4 In the case of guests who are already in a relationship before the start of their holiday, we are normally aware of the context and of the attitudes of their normal carers. We

have to be sensitive to these views, whilst at the same time supporting the guests in exercising their rights. Guests may only share a room if they book together - see our standard Terms and Conditions for making a booking.

- §5 For those guests who discover a relationship during the holiday, we seek to ensure that proper consent is involved and that, if necessary, emotional and physical advice and support is available, including access to contraception. If necessary, guidance from the normal carers may be sought.
- §6 Relationships which develop towards sexual activity are closely monitored and, in appropriate cases, advice may be sought from their normal carers.

9.1.5 Medication

- §1 We are not responsible for the medication which is prescribed for guests and only in rare circumstances will arrange for guests to receive newly prescribed drugs during their holiday.
- §2 For many guests, we hold and take responsibility for ensuring that guests take their medication as prescribed and dispensed. (See statement on medication procedures) We will ensure that the support given to guests in handling their medication is not abused as a means of exercising control and/or punishment.
- §3 We are aware that medication can be used without patient consent or to exercise control. We would not seek to encourage such action, unless clearly in the guest's interests and advised by the attending doctor.
- §4 A more detailed statement on medication is made in Section 8

9.1.6 Medical Treatment

- §1 Arrangements for guests to have medical treatment will only be made in an emergency, unless previously organised in advance through the local health centre by the guests's normal carers. The telephone number for the local Doctors Surgery is 01208 812222.
- §2 The care support forms indicate whether each guest is able to give consent for medical treatment. We will actively support them in exercising that right should the need arise.
- §3 In other cases we will act solely within medical advice given locally and always in the perceived best interests of the individual guest.

9.1.7 Disclosure of Abuse in the Home Environment

- §1 It is possible guests may disclose information which gives rise to concern about home circumstances or events outwith the bounds of the holiday.
- §2 We seek firstly to take such disclosures seriously but recognise that it may be better, in many cases, for the issue to be dealt with in their home situation. Such guests will be encouraged to exercise self-advocacy on their return home. Subject to consent from the guest, their Home Carer will be informed that the guest has matters to disclose.

- §3 If the disclosure is of a serious nature, however, and particularly if the disclosure indicates a significant risk of danger immediately upon return and especially if the matter relates to the Home Carer, the Cornwall Department of Adult Social Care must be informed.
- §4 Under current guidance, we must not investigate any disclosures but staff are advised that they should not underwrite fantasies or other unrealistic descriptions of probably harmless situations. We recognise that there may be conflicts between different aspects of our Duty of Care. In non-emergency situations, advice should be sought from the Duty Manager who will record the concerns and ensure that these are brought to the attention of the Care Manager.
- §5 As a matter of policy we seek to work with normal care situations, recognising that the guests are with us for a short period of time and that they will return at the end of the holiday. Our approach to individual guests must therefore only alter such care regimes with good reason.

9.2 Abuse by Staff

- §1 Trevanion House has in place selection, procedures and training which it is expected will ensure that abuse does not take place through lack of skill or through a known pre-disposition to abuse.
- §2 However, in the unlikely event that such abuse is discovered by Management, it will be treated as Gross Misconduct and dealt with under the disciplinary procedure set out in the Staff Handbook. In any event, the reporting procedures in *No Secrets* will be implemented. All staff are issued with an **Alerter's Flowchart** and receive in-house *No Secrets* training.
- §3 Staff are also advised that they have open access to the Duty Manager, Care Manager, General Manager and the other Directors at any time to voice concerns about any aspect of the operation of Trevanion House, whether or not it involves abuse by staff. If they are not satisfied with the reaction on an internal basis they may also report their concerns to CSCI either at an announced inspection or at any time.
- §4 Staff have an assurance that they will not be discriminated against for having raised any such matter - so called whistle-blowing - nor will their identity be unnecessarily disclosed without their prior permission.
- §5 Staff are also assured that complaints against them will be treated fairly and with a minimum of disruption and distress, consistent with meeting the needs and rights of the complainant, guest or staff.
- §6 In particular, staff are informed regularly that in the event of an accident, complaint or other problem situation leading to an external investigation, they will be fully supported by Trevanion House, providing that they have acted reasonably within such guidelines as they have been given.

9.3 Alerter's Flowchart

- §1 In the event of abuse occurring or being reported, then the actions set out in the Alerter's Flowchart below must be followed.
- §2 In an emergency, the police may be contacted via the 999 service and in other cases the North Cornwall office of the Department of Adult Social Care (Cornwall County Council) should be contacted as follows:

Day time: 01208 - 74491
Out of Hours: 01208 - 251300

10. Bullying

- §1 In the context of holidays at Trevanion House, bullying is not expected to be a significant factor, which more frequently arises in long-term relationships. However, we have adopted the following more general policies which are intended also to cover potential situations of bullying amongst guests. We interpret the phrase 'bullying' to include aggressive, threatening or other behaviour which is intended to intimidate another person, especially someone more vulnerable.
- §2 Guests are expected to behave during their visit to Trevanion House in ways which are courteous and respectful towards others - other guests, staff and people they meet when on visits outside Trevanion House.
- §3 We take a pro-active approach which does not condone unacceptable behaviour, especially when it is believed that the guest fully understands the differences between acceptable and unacceptable behaviour. At the same time, positive responses are made to those who show special consideration to others.
- §4 Unacceptable behaviour can include:
- lack of respect towards the integrity of others
 - failure to say please, thanks etc
 - lack of awareness of group needs
 - failure to respect turn-taking, especially in conversation
 - swearing, talking loudly, nuisance
 - referring to socially inappropriate or personal matters
 - calling attention to disabilities or other sensitive personal characteristics
 - violence
 - entering the personal space of someone else
 - excessive alcohol consumption
 - smoking where not permitted
 - inappropriate touching
 - unwanted sexual approaches
 - racial harrasment or discriminatory attitudes
 - unacceptable reference to gender, sexuality, age, colour or religion
- §5 Guests are encouraged to take responsibility for their actions. In particular they are encouraged to make apologies where appropriate and, more especially, to make efforts not to repeat the behaviour.
- §6 When staff become aware that a guest is acting towards another guest in a manner that is consistently unacceptable, intervention is normal, within the general approach set out

above. Care is taken to ensure that a fair determination of responsibility is made and that a complainant is not assumed to be a wholly innocent party.

- §7 Staff are trained to give emphasis to self-advocacy and empowerment, supporting guests in resolving inter-personal problems themselves.
- §8 However, we cannot provide total supervision of guests whilst at Trevanion House, nor would it be consistent with other principles of respect, privacy and self-determination to do so. We cannot therefore guarantee that a guest, any more than if they were staying in any other hotel, will not be the target of socially unacceptable behaviour from other guests. We can only undertake to deal with matters as they arise and to exercise due diligence in avoiding situations with an unacceptable degree of risk.
- §9 The structure of Trevanion House holidays is such that no one member of staff has a sustained involvement with particular guests. Staff are encouraged to recognise if there is a guest they find difficult to handle and to re-arrange assignments to avoid problems. As far as possible, this is done on a no-blame basis. We believe that this policy is likely to reduce the possibility of inappropriate behaviour of staff towards a guest, including bullying. There are only limited occasions on which staff interact with guests in isolation.
- §10 Staff are instructed actively to deter physical approaches to themselves, with limited exceptions. Guests are advised if they attempt behaviour which, amongst others, would be considered socially unacceptable. The possession of a learning disability is not considered, on its own, as sufficient cause for socially deficient behaviour.
- §11 In general terms, staff are expected to treat guests at all times with appropriate respect, adapting their manner to individual circumstances and needs. It is recognised that many adults with a learning disability have a reduced sensitivity to subtle suggestions and it is sometimes necessary to be more direct than might otherwise be considered socially appropriate.
- §12 Nevertheless, we have a fundamental belief that all our guests are adults and should be treated as full members of society, exercising both rights and responsibilities.
- §13 It necessarily follows that any behaviour by staff that could remotely be described as bullying is wholly unacceptable and would result in immediate disciplinary action should it be revealed.
- §14 The preceding statement is written in terms of bullying towards guests. However, the same principles are expected to apply to relationships between staff and between Trevanion House and its staff.

11. Criminal Records Bureau

- §1 We are committed to ensuring that our staff are checked with the Criminal Records Bureau (CRB) in accordance with the latest requirements and against the POVA List (Protection of Vulnerable Adults).
- §2 Every effort is made to obtain clearance before a new member of staff commences work. In the event that there are delays by CRB, unusually it may be necessary for the new member of staff to be accompanied whenever undertaking duties that require a CRB check.
- §4 The cost of obtaining this clearance is met by Trevanion House. However, the clearance obtained in this way may not be used by the employee in connection with any other employment.
- §5 It is currently understood that CRB checks may have to be renewed every three years.

12. Staff Training

- §1 At Trevanion House we wish to encourage all staff to undertake appropriate training. However, we recognise the difficulties in identifying relevant courses and in travelling to access them.
- §2 Hitherto we have made arrangements on an individual ad hoc basis but it may be helpful to clarify some aspects on a general basis.
- §3 For NVQ courses we have in-house capability to assess students on the care courses.
- §4 If at all possible we wish to encourage any staff undertaking care courses to do so in a way that gives opportunities to make contact with staff from other establishments, rather than to do the whole course internally.
- §5 Staff under 25 are encouraged to consider a Modern Apprenticeship which will include free access to approved courses. For other staff, we will pay the course fees but these will have to be repaid if you leave permanently within one year of completing the course or withdraw from the course, and half if you leave within two years.
- §6 Food Hygiene, First Aid, Medication and single subject courses are arranged as they become available. Attendance at such courses may be deemed part of the employee's duties and thus be compulsory.
- §7 Such short courses will normally be undertaken in paid time and, if off-site, reasonable travelling costs will be met.
- §8 Staff are actively encouraged to discuss with us any other possibilities for training and we undertake to consider these as positively as we can, bearing in mind the costs involved and the relevance of the course to your work with us.
- §9 As our work is seasonal, we obviously would like to maximise the amount of training which takes place in the less busy parts of the year but this is not always possible, especially when college attendance is involved.

13. Safety

- §1 The policy of Trevanion House is to ensure the safety and welfare of its employees both by adherence to statutory requirements and by the adoption of what is considered in the profession to be best practice.
- §2 All staff should attend an induction session within four weeks of commencing their employment. All procedures and policies with regard to safety, both of employees and guests, will be outlined and, whenever appropriate, training in their implementation will be given.
- §3 The Proprietors are jointly responsible for safety but may delegate that responsibility on a day to day basis to whichever senior staff are on duty.
- §4 All accidents, whether to employees or guests, will be recorded using an Incident Recording facility which is part of our computer admin system. Copies of these reports are sent to CSCI as required by their regulations.
- §5 Any accident connected with work which results in an employee being unable to do their normal work for more than three days must be reported to the local authority using Form F2508. If a doctor notifies us that an employee suffers a reportable work-related disease, then this has to be notified to the local authority using Form F2508A.
- §6 A guide to RIDDOR (*Reporting of Injuries, Diseases and Dangerous Occurrences Regulations*) is available to staff in the Health and Safety File. A *Return-to-Work* interview is held with any member of staff following a period of absence on medical grounds, whether or not self-certificated, however brief the absence. The purpose of this interview is to ensure that staff are fit for their duties. Senior staff conducting these interviews are required to notify the General Manager of their outcome and whether a RIDDOR report may be necessary. The General Manager is responsible for reviewing these reports and making the RIDDOR reports, in addition to any statutory duties which the staff themselves may need to fulfil.
- §7 Every effort will be made to avoid using substances on the premises that require trained staff in their application. A statement of what action to take in the event of spillage or misuse, especially of cleaning materials, will be prominently displayed. COSHH information sheets will always be readily available.
- §8 Any member of staff that has a matter of safety to discuss is encouraged to raise that matter with a member of the Management Team who undertake to consider it and to give a reaction within a reasonable time. In the event that a member of staff is not satisfied with the action taken they have the right to raise the matter with the Proprietors who have the formal legal Health and Safety liability.

14. Equal Opportunities

- §1 The policy of Trevanion House is to affirm a commitment to equal opportunity in regard to gender, ethnic origin and disability both by adherence to statutory requirements and by the adoption of what is considered in the profession to be best practice.
- §2 Staff involved in giving personal care may be selected with regard to gender in order to ensure that we can meet user needs and preferences. No discrimination on the grounds of gender will be made which cannot be justified by this criterion.
- §3 Staff involved in giving personal care and in carrying out escort duties may be selected with regard to disability. We need to be assured that any physical limitations will not compromise our responsibilities to our guests. The ability of staff to drive and/or operate our minibuses is significant for some posts. People with learning disabilities will be considered for employment if they are able to undertake the duties required.
- §4 Trevanion House makes explicit efforts to provide meaningful work placements to adults with a learning disability and affirms their right to such opportunities.
- §5 No discrimination on the grounds of ethnic origin or religious preferences is permitted.

15. Falling Guests, Lifting and Aggression

- §1 Some of our guests may have a tendency to fall regularly, either because of instability or because of other medical conditions. It is the duty of staff to provide care for such guests and to minimise the harm to them, within the context of this policy.
- §2 We cannot guarantee to prevent our guests from falling, especially as staff are not always present with them.
- §3 At no time are staff to attempt to prevent a fall unless it is entirely without risk to themselves. We cannot commit ourselves to compensate or otherwise assist staff who become injured in this way.
- §4 The positive expectation of staff is that they should familiarise themselves (or seek training) with techniques that reduce the risk of harm to a guest when they fall. In most cases, this will mean concentrating on breaking the fall or removing dangerous objects from the path of the fall.
- §5 If a fall occurs, staff should assess the extent of any injuries and to seek further assistance as appropriate.
- §6 There is very little time in which to react and decisions have to be made almost instinctively. Provided that staff have acted positively and reduced the risk of injury, Trevanion House will not discipline or otherwise criticise them for their actions. In words used by other authorities, “Better a bruised client than an injured member of staff.” Staff are usually responsible for several guests at a time and their needs are equally important.
- §7 Similar principles also apply to lifting guests. Staff are expected to ensure that they do not at any time expose themselves to the risk of injury when lifting guests.
- §8 A very limited number of our guests may have episodes of aggressive behaviour when they seek to harm themselves, other guests or staff. Whenever such behaviour is known about in advance, you will be given appropriate advice on how to handle likely situations. In general, however, staff are expected to act so as to avoid being hit or otherwise harmed by a guest.
- §9 Our general advice is to remove oneself and other guests from the vicinity. Avoid an immediate confrontation. Allow a cooling down period. Make an opportunity to discuss with the guest the cause of the aggressive behaviour and ways of handling frustration or difficulty in a more socially acceptable fashion.
- §10 It is clear that this policy may be difficult for some guests, or their families and carers, to accept or understand. In such cases, staff are to seek help from the Care Manager, or other appropriate senior member of staff, to explain to the persons concerned how this policy will operate in the specific case.

16. Quality Assurance and Performance Standards

16.1 Performance Standards

- §1 Trevanion House is committed to providing a standard of holiday accommodation that is comparable with upper quartile of small hotels providing accommodation for the general public making their holiday in Cornwall. In general, the aim is to meet the environment standards for Three Star accommodation as defined by the Tourist Council, with the exception that it is not guaranteed that staff will be on duty throughout the time when guests are normally away from the hotel.
- §2 Trevanion House is committed to providing care for people with a learning disability that is at least consistent with *best practice* and, wherever possible and relevant, sets new standards in comparison with provision at national level.
- §3 Trevanion House seeks to conform to all relevant and applicable standards laid down by national, regional and local regulatory bodies:

National Care Standards

Environmental Health

Fire Authority

Financial Regulation

Police and Licensing Authority

Tourist Agency

Local Planning Authority

16.2 Quality Assurance

- §1 Quality Assurance procedures are intended to monitor the achievements of those standards which Trevanion House aims to meet.
- §2 The proprietors and senior managers rotate their duties and contact with other staff in order to maintain a continuous monitoring of performance. Wherever practical, tasks are never performed by one individual on a permanent, unsupervised basis.
- §3 On the other hand, Trevanion House believes positively that staff should be trained, instructed and monitored so that they can perform appropriately those tasks delegated to them with a minimum of day-to-day supervision, consistent with the nature of their duties. Many of the tasks, especially when accompanying guests on outings, have to be undertaken with a considerable measure of independence and the ability of staff to act with appropriate initiative is a significant factor in their appointment.
- §4 Senior staff meet with every guest several times during their holiday. The two group planning meetings enable issues to be raised and monitored, as guests are reminded of their responsibility for bringing matters of concern – such as problems with their rooms – to the attention of staff. Each day there is an opportunity for one-to-one conversations during the Guest Bank session which enables minor difficulties to be monitored. The

Registration process, both at the start and at the end of the holiday, provides a more extended opportunity. A feedback form is included in the Return Envelope which guests, with their carers, are invited to complete on an anonymous basis after the holiday.

§5 All staff who come into contact with the guests during their holiday are encouraged to feed back any comments and, especially where these relate

Activities a guest wishes to undertake during holiday

Maintenance matters regarding rooms

On-going personal care needs

Shopping/postcard/telephone call support wishes

§6 Many holiday organisers make the assumption that the needs of a guest who stayed, perhaps years, earlier are well-known. As a result procedures are in place to enable our staff to access summaries of care needs for each previous visit by the guest as well as archiving records on a chronological basis.

§7 Senior staff have specific responsibilities:

Gerry Ward – General Manager – overseeing the running of the Hotel

Tracey Barrett - Registered Care Manager –the provision of care

Melanie Kerr – Holiday Manager – hospitality standards

16.3 National Care Standards

§1 The National Care Standards provide, in Section 39, the basis for Quality Assurance and Trevanion House seeks to meet this standard as follows:

§2 Whilst the National Care Standards are written against a background of residential care, it is important to interpret them effectively into the holiday and respite situation.

§3 Obtaining reliable and usable feedback from both holidaymakers and people with a learning disability is complex and often involves indirect processes. Perhaps the best measure for Trevanion House is the continued development of the holiday programme and the progressive rise in numbers through the past decade. However, as bookings are now almost at the capacity of the calendar, it is important to monitor satisfaction by other means.

§4 Towards the end of each season, the Proprietors and Managers meet to discuss plans for the provision in the next season, especially where capital expenditure is involved or works that need to be carried out whilst there are no guests on holiday.

§5 The track record of Trevanion House has been one of the continuous improvements and all aspects of the operation are regularly reviewed and changes implemented. Staff are actively encouraged to make suggestions, which are pursued practically if positively evaluated.

- §6 A feedback form (Guest Survey) is included in the Return Envelope which accompanies each guest at the end of their holiday. They, together with their normal carers, are encouraged to complete this simple form on an anonymous basis. The content of the form is reviewed annually and modifications may be made to enable monitoring of specific changes which are introduced for that season.
- §7 The number of formal complaints has been consistently low. It is believed that this is one result of the high degree of active involvement and monitoring by senior staff throughout each guest's holiday. However, critical comments are occasionally received and, as a matter of principle, these are always followed up and, if appropriate, a written response is made. However, since the feedback usually comes through a third party, and not always the actual holiday organiser, the feedback often reflects difficulties of communication in the guest's normal care situation. Substantial complaints are automatically reported to CSCI, in accordance with their regulations.
- §8 It is a matter of policy that problems arising from medication, Health, accidents, visits to hospital or doctor are reported either during the holiday or with the return information. Discretion is used in the case of issues to do with behaviour and inter-personal relationship or other matters where personal privacy is paramount, although these will be subject to the requirements of Alerters. (see Section 9)
- §9 At present it is not considered feasible to engage in group feedback as this could be inappropriately intrusive on the holiday context. Wherever possible, a guiding principle for Trevanion House is to seek comparisons with holidays taken by members of society in general, having regard to the specific needs of the guests and their individual social and care contexts.
- §10 Feedback from staff is obtained through regular 6 weekly supervision meetings. Staff are generally encouraged to make suggestions and to raise any concerns that they might have, initially through the Duty Manager (if urgent) or through their line manager at supervision (if non-urgent)
- §11 Regular inspections of all rooms are made and any defects noted for repair within practical timescales. Trevanion House aims to make minor repairs to facilities used by guests within 24 hours, although any major problem may depend on the availability of specialist outside contractors.
- §12 In accordance with the Regulations, the Proprietors conduct a monthly inspection of the premises and meet with guests. The formal reports of these visits are forwarded both to the managers and to CSCI.

17. Lone Worker Policy

17.1 Definition

§1 A lone worker is a member of staff who is working at a time or place when no other staff members are present. This maybe inside or outside of Trevanion House or similar environments and includes trip visits. Lone working is not unique to any particular group of staff, working sector or time of day

17.2 Aim.

§1 It is essential that all staff feel safe and secure at all times in order to perform their duties free from fear and in full knowledge that there are management procedures in place to support the staff, should they find themselves in a threatening environment, or are in need of help. Staff also have a responsibility for maintaining their own personal safety and that of others.

§2 The Lone Worker arrangements cover all staff who regularly work alone; e.g: Cooks, Maintenance and TRACS and those staff who on occasions are alone in office and reception areas or whilst supporting guests on a visit.

17.3 Purpose

§1 The purpose of the Lone Worker Policy is to ensure that all staff are made aware of the responsibilities and take precautions in relation to lone working. It should be read in conjunction with existing Health and Safety Policy statements, which form the framework of responsibility for the risk assessment.

§2 All management are responsible for ensuring that staff for whom they are responsible are not placed at avoidable risk. Managers must ensure that structures and procedures are in place and adhered to in order to demonstrate as far as is reasonably practicable, that staff are safe if something untoward should occur.

§3 All staff are responsible for reporting any events or incidents relating to lone working and undertaking risk assessments, so that risks can be clearly identified and suitable measures provided to control those risks as far as is reasonably practicable.

§4 Any planned activities which involve lone working must be discussed in advance by the staff member concerned and their line manager who is responsible for ensuring that suitable procedures are in place and that the member of staff is aware of their responsibilities in minimising risks.

§5 Staff members in lone working must ensure that:

they know how to summon assistance both internally and externally when required.

their Manager has been alerted that they are working alone including the location and authority for lone working has been agreed.

they know what emergency arrangements in addition to existing general procedures are required in respect of lone working.

they understand whether the means of access to a work area should be controlled to prevent unauthorised access whilst lone working.

the activities being carried out suitable for one person.

they have the ability to perform the role required whilst a lone worker.

§6 Staff working alone must know how to make a full risk assessment of their role and duties, including:

physical assault - Intentional application of force to a person of another, without lawful justification, resulting in physical injury or personal discomfort

non-physical assault - The use of inappropriate words or behaviour causing distress and/or constituting harassment.

This Covers

verbal aggression

threats of violence both verbal and gestures and actual violence

sexual related aggression including talk, jokes, exposure, touching or groping etc

racist language and taunts

In order to assess the risk to yourself and your colleagues you should consider:

Tasks - What you do that may upset or annoy someone?

People - Do you work with individuals or groups whose behaviour is unpredictable?

Places - Where are the tasks being performed - in the house, on-site or outside, off-site? Are there places, which are unsafe more so than others?

Working environment - Is the working environment safe or unsafe?

Times - Are there times when you feel more unsafe than other times?

When you consider these factors and identify areas of risk you should discuss them with your line manager to look at possible solutions/actions, which can be taken to minimise the risks.

§7 When working away from Trevanion House, methods of communication are especially important and must be viewed as tools in both reactive and preventive strategies to reduce risks for lone workers. Correct communication can assist employees in carrying out their duties more effectively and therefore reduce frustration in staff and service users. They allow staff to inform others of their whereabouts and report incidents during and at the end of the shift. In addition they allow for methods of contacting emergency personnel, including such mishaps as vehicle breakdown as well as violence.

§8 Staff should ensure that they are familiar with the ON CALL and emergency procedures currently deployed at Trevanion House.

