



ACTON TRUSSELL
BEDNALL & TEDDESLEY HAY

**COMMUNITY
CENTRE**

POLICY DOCUMENTS

Approved by the Board of Trustees
29 May 2024 v2.1
Reviewed & Agreed 2 June 2025 v.2.1

Registered as a Trust with the Charity Commission number 517889

The purpose of our charity policies and procedures is to ensure that the Trust complies with all of our regulatory and legal obligations and that the charity operates safely, efficiently and consistently.

They apply to all trustees and users of the Centre and its facilities.

Policies and Procedures are reviewed and approved annually by the Board of Trustees and updated as necessary.

For clarification or further information on these policies please refer to the Charity Commission website:
<https://www.gov.uk/government/organisations/charity-commission>

C O N T E N T S

Pages 3 - 9	Safeguarding Policy
Pages 10 - 11	Equality, Diversity and Inclusion Policy
Pages 12 - 14	Risk Management
Pages 15—17	Conflict of Interests
Pages 18 - 23	Environmental Sustainability
Pages 24 - 25	Health & Safety
Pages 26 - 28	Food Safety
Pages 29 - 31	Public Disclosure (Whistleblowing)
Pages 32 - 35	Data Protection
Pages 36 - 40	Social Media.
Pages 41 - 42	Anti-Money Laundering
Pages 43 - 49	Financial Control
Pages 50—52	Complaints Policy

Policy Title

SAFEGUARDING POLICY

Purpose

Our charitable activities include working with vulnerable people. The purpose of this policy is to protect them and provide stakeholders and the public with the overarching principles that guide our approach in doing so.

Lead Trustee

A lead trustee will be appointed to provide oversight of safeguarding and to lead on any incident investigation and reporting.

LEAD TRUSTEE IS:

SUE CALVERT sue@suecalvert.com

Applicability

This policy applies to anyone working on our behalf, including our trustees and other volunteers.

Partner organisations will be required to have their own safeguarding procedures that must, as a minimum, meet the standards outlined below, and include any additional legal or regulatory requirements specific to their work. These include, but are not limited to other UK regulators, if applicable.

Safeguarding should be appropriately reflected in other relevant policies and procedures.

Principles

We believe that:

- Nobody who is involved in our work should ever experience abuse, harm, neglect or exploitation.
- We all have a responsibility to promote the welfare of all of our beneficiaries, staff and volunteers, to keep them safe and to work in a way that protects them.
- We all have a collective responsibility for creating a culture in which our people not only feel safe, but also able to speak up, if they have any concerns.

Types of Abuse

Abuse can take many forms, such as physical, psychological or emotional, financial, sexual or institutional abuse, including neglect and exploitation. Signs that may indicate the different types of abuse are at Appendix 1 (*Page 7*).

Reporting Concerns

If a crime is in progress, or an individual is in immediate danger, call the police, as you would in any other circumstances.

If you are a user, or member of the public, make your concerns known to a member of our team, who will alert a trustee of the charity.

For members of the charity, make your concerns known to your supervisor. If you feel unable to do so, speak to a trustee.

The trustees are mindful of their reporting obligations to the Charity Commission in respect of Serious Incident Reporting and, if applicable, other regulator. They are aware of the Government guidance on handling safeguarding allegations.

Responsibilities

Trustees. This safeguarding policy will be reviewed and approved by the Board annually.

Trustees are aware of and will comply with the Charity Commission guidance on safeguarding and protecting people and also the 10 actions trustee boards need to take to ensure good safeguarding governance. A lead trustee/ committee will be given responsibility for the oversight of all aspects of safety, including whistleblowing and H&SW. This will include:

- Creating a culture of respect, in which everyone feel safe and able to speak up.
- An annual review of safety, with recommendations to the Board.
- Receiving regular reports, to ensure this and related policies are being applied consistently.
- Providing oversight of any lapses in safeguarding.
- Ensuring that any issues are properly investigated and dealt with quickly, fairly and sensitively, and any reporting to the Police/statutory authorities is carried out and monitored.
- Leading the organisation in way that makes everyone feels safe and able to speak up.
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of our risk management processes.
- Promoting dementia awareness and how best to recognise and assist people with the condition using the Centre.

Responsibilities

- Ensuring that all relevant checks are carried out in recruiting staff and volunteers.
- Planning programmes/activities to take into account potential safeguarding risks, to ensure these are adequately mitigated.
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required.
- Ensuring that a central register is maintained and subject to regular monitoring to ensure that DBS clearances and training are kept up-to-date.
- Ensuring that safeguarding requirements (eg DBS) and responsibilities are reflected in job descriptions, appraisal objectives and personal development plans, as appropriate.
- Listening and engaging, beneficiaries, staff, volunteers and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these.
- Ensuring that personal data is stored and managed in a safe way that is compliant with data protection regulations, including valid consent to use any imagery or video.

Making trustees, staff, volunteers and others aware of:

- Our safeguarding procedures and their specific safeguarding responsibilities on induction, with regular updates/reminders, as necessary.
- The signs of potential abuse and how to report these.

Everyone. To be aware of our procedures, undertake any necessary training, be aware of the risks and signs of potential abuse and, if you have concerns, to report these immediately (see above).

Fundraising

We will ensure that:

- We comply with the Code of Fundraising Practice, including fundraising that involves children.

Fundraising

- Staff and volunteers are made aware of the Institute of Fundraising guidance on keeping fundraising safe and the NCVO Guidance on vulnerable people and fundraising.
- Our fundraising material is accessible, clear and ethical, including not placing any undue pressure on individuals to donate.
- We do not either solicit nor accept donations from anyone whom we know or may not be competent to make their own decisions.
- We are sensitive to any particular need that a donor may have.

Online Safety

We will identify and manage online risks by ensuring:

- Volunteers, staff and trustees understand how to keep themselves safe online. We may use high privacy settings and password access to meetings to support this.
- The online services we provide are suitable for our users. For example, use age restrictions and offer password protection to help keep people safe.
- The services we use and/or provide are safe and in line with our code of conduct.
- We protect people's personal data and follow data protection legislation.
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.
- We clearly explain how users can report online concerns. Concerns may be reported using this policy, or direct to a social media provider using their reporting process. If you are unsure, you can contact any trustee who will help you.
- We have adopted and comply with the Charity Ethics & Governance Framework.

Working With Other Organisations

In working with other organisations, including any grant making, we will comply with Charity Commission guidance by carrying out relevant due diligence and having a written agreement that sets out:

- Our relationship.
- The role of each organisation.
- Monitoring and reporting arrangements.

Policy Title

SAFEGUARDING POLICY continued

Version Control - Approval & Review

Version Number	Approved By	Approval Date	Main Changes	Review Period
v.1.0	Board	28-02-24	Initial Draft Approved	
v.2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

This policy will be reviewed as part of any safeguarding incident investigation, to test that it has been complied with and to see if any improvements might realistically be made to it.

Appendix 1 - Signs of Abuse

Physical Abuse:

- bruises, black eyes, welts, lacerations, and rope marks.
- broken bones.
- open wounds, cuts, punctures, untreated injuries in various stages of healing.
- broken eyeglasses/frames, or any physical signs of being punished or restrained.
- laboratory findings of either an overdose or under dose medications.
- individual's report being hit, slapped, kicked, or mistreated.
- vulnerable adult's sudden change in behaviour.
- the caregiver's refusal to allow visitors to see a vulnerable adult alone.

Sexual Abuse:

- bruises around the breasts or genital area.
- unexplained venereal disease or genital infections.
- unexplained vaginal or anal bleeding.
- torn, stained, or bloody underclothing.
- an individual's report of being sexually assaulted or raped.

Appendix 1 - Signs of Abuse

Mental Mistreatment/Emotional Abuse:

- being emotionally upset or agitated.
- being extremely withdrawn and non-communicative or non-responsive.
- nervousness around certain people.
- an individual's report of being verbally or mentally mistreated.

Neglect:

- dehydration, malnutrition, untreated bed sores and poor personal hygiene.
- unattended or untreated health problems.
- hazardous or unsafe living condition (e.g., improper wiring, no heat or running water).
- unsanitary and unclean living conditions (e.g., dirt, fleas, lice on person, faecal/urine smell, inadequate clothing).
- an individual's report of being mistreated.

Self-Neglect:

- dehydration, malnutrition, untreated or improperly attended medical conditions, and poor personal hygiene.
- hazardous or unsafe living conditions.
- unsanitary or unclean living quarters (e.g., animal/insect infestation, no functioning toilet, faecal or urine smell).
- inappropriate and/or inadequate clothing, lack of the necessary medical aids.
- grossly inadequate housing or homelessness.
- inadequate medical care, not taking prescribed medications properly.

Appendix 1 - Signs of Abuse

Exploitation:

- sudden changes in bank account or banking practice, including an unexplained withdrawal of large sums of money.
- adding additional names on bank signature cards.
- unauthorized withdrawal of funds using an ATM card.
- abrupt changes in a will or other financial documents.
- unexplained disappearance of funds or valuable possessions.
- bills unpaid despite the money being available to pay them.
- forging a signature on financial transactions or for the titles of possessions.
- sudden appearance of previously uninvolved relatives claiming rights to a vulnerable adult's possessions.
- unexplained sudden transfer of assets to a family member or someone outside the family.
- providing services that are not necessary.
- individual's report of exploitation.

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Policy Title

EQUALITY, DIVERSITY & INCLUSION POLICY

Aims

- (1) The Trust is committed to encouraging equality, diversity and inclusion among our trustees, volunteers and users, and eliminating unlawful discrimination.
- (2) The aim is for our trustees, volunteers and users to be truly representative of the Trust's "area of benefit" and for each trustee, volunteer and user to feel respected and appreciated.
- (3) The organisation - in providing goods and/or services and/or facilities - is also committed against unlawful discrimination of customers or the public.

Purpose

The purpose of this policy is to:

1. Provide equality, fairness and respect for all;
2. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of:
 - age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race (including colour, nationality, and ethnic or national origin)
 - religion or belief
 - sex
 - sexual orientation
3. Oppose and avoid all forms of unlawful discrimination. This includes in:
 - pay and benefits
 - terms and conditions of employment or volunteering role
 - dealing with grievances and discipline
 - dismissal
 - redundancy
 - leave for parents
 - requests for flexible working
 - selection for employment, promotion, training or other developmental opportunities

Our Commitments

The organisation commits to:

1. Encouraging equality, diversity and inclusion in the Centre and its activities as they are good practice, make business sense and develop community.
2. Creating an environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all users are recognised and valued.

Our Commitments

This commitment includes training trustees and other relevant parties about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include conducting themselves to help the organisation provide equal opportunities and prevent bullying, harassment, victimisation and unlawful discrimination.

All trustees and users should understand they can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of using the Centre, against fellow volunteers, customers, suppliers and the public

3. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow users, customers, suppliers, visitors, the public and any others in the course of the organisation's activities.

Such acts will be dealt with as misconduct under the Trust's policies and conditions of hire and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to termination of use without notice.

Further, sexual harassment may amount to a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

4. Make opportunities for training, development and progress available to all trustees, staff and appropriate volunteers, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.

5. Review practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

6. Monitor the make-up of the volunteer workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

Version Control - Approval and Review

Version Number	Approved By	Approval Date	Main Changes	Review Period
v.1.0	Board	28-02-24	Initial Draft Approved	
v.2.1	Board	29-05-24	Policy Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

Introduction

We recognise the importance of effective risk management to achieve our charitable objectives. This policy outlines our commitment to identifying, assessing and managing risks to ensure our charity's resilience and continued success.

Purpose

The purpose of this policy is to establish a framework for identifying, assessing, prioritising and managing risks associated with our activities. It aims to ensure a systematic and proactive approach to risk management, protecting the charity, its beneficiaries and stakeholders.

Scope

This policy applies to all trustees, employees, volunteers, and stakeholders involved in our work. It covers all aspects of the charity's operations, including but not limited to programmes, finances, reputational risk and governance. Where necessary, we will create additional relevant policies, such as systems of internal control, due diligence and health & safety policies.

Charity Commission Guidance

The Charity Commission strongly recommends that charities have a clear risk management policy and process to identify and manage all types of risks and embed risk management into the charity's work. CC26 provides guidance.

Risk Management Cycle

Risk is usually managed by means of a cycle of identification, quantification, management and review.

- **Identification.** Identify the various risks that may materialise and maintain a Risk Register.
- **Quantifying.** Assess and quantify these risks.
- **Managing.** Take appropriate action to manage these risks. This is usually the weakest area in a risk management framework. Risks can be managed as follows:
 - >**Avoidance.** Action that can be taken to avoid a risk occurring.
 - >**Mitigation.** Action that can be taken to reduce the impact a risk may have, if it occurs.
 - >**Buying Out.** Generally, this is done using insurance.
 - >**Accepting.** Risk cannot be eliminated entirely, and any steps taken to manage risk must be reasonable, as resources are not unlimited in terms of money and time. Equally, adopting a purely risk averse approach limits opportunity.

> **Reviewing.** Risks should be reviewed as regularly as is necessary, depending on their likely probability and impact in the light of changing circumstances. This may be done on an ongoing basis, at appropriate points in projects or at regular meetings.

Responsibilities

The Board of Trustees has overall responsibility for ensuring that there is an appropriate system of controls, financial and otherwise in place and working effectively. The systems of financial control are designed to provide reasonable, but not absolute, assurance against material misstatement or loss. These include:

- a strategic plan and an annual business plan and budget approved by the Board.
- regular consideration by the Board of financial results and variance from budgets.
- delegation of authority and segregation of duties.
- management of risk.

All trustees, staff, users and volunteers have a role in identifying and reporting risks within their respective areas of responsibility.

Risk Identification and Assessment

- Risks will be identified through regular risk assessments conducted at least annually and a Risk Register maintained.
- Identified risks will be assessed based on likelihood and impact to determine the level of risk.
- Risks will be categorised as strategic, operational, financial, or compliance related.

Risk Mitigation and Management

- Strategies for risk mitigation will be developed for high-priority risks.
- Mitigation plans will be assigned to responsible individuals with clear timelines.
- Regular monitoring and reporting on the progress of risk mitigation plans will be conducted.

Reporting and Communication

- A risk register will be maintained and regularly reviewed by the Board of Trustees.
- Key risks and mitigation efforts will be communicated to relevant stakeholders.
- In its annual report, the Board will report on the steps it has taken to manage risk, to demonstrate the charity's accountability to its stakeholders including beneficiaries, donors, funders, employees and the general public.

Review and Continuous Improvement

- The risk management policy and processes will be reviewed annually or as needed.
- Lessons learned from risk events will be used to improve risk management practices.

Training and Awareness

- Staff and volunteers will receive training on risk management principles and practices.
- Regular communication will be conducted to raise awareness of the importance of risk management.

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Introduction

The guidelines on managing conflict of interest are contained in our governing document and will be followed at all times, as will the guidance issued by the Charity Commission.

Scope

The Board of Trustees will make decisions based only on what's best for the Charity. We do not allow personal interests, or the interests of people or organisations connected to board members, to influence these decisions.

There are 2 common types of conflict of interest:

- **Financial conflicts** - when a trustee, or person or organisation connected to them, could get money or something else of value from a trustee decision. This does not include the payment of expenses.
- **Loyalty conflicts** - other reasons, a board member might not be able to make decisions that are best for the charity.

Generally, a potential conflict of interest will occur when a board member has a connection to another organisation or person that we have a financial, or other working arrangement with, either as:

- Family – his or her partner, child etc or:
- Organisation – as a trustee, board member, member of staff, user group or similar.

Related Parties

We have a close working relationship with the Acton Trussell, Bednall and Teddesley Hay Parish Council, and shared values. However, it is both an independent legal entity and a contractual partner.

It is important that we are not only demonstrably independent of them, but also seen to be. Consequently, trustees who have a close personal or working relationship with the Council or an individual employed by them, should declare this, as a conflict of interest.

This applies to any other organisations with whom we have or intend to have a contractual relationship.

Meetings

Conflicts of Interest is a standing item on all board and committee agendas; the chairman will remind trustees at the start of each meeting that any interests must be declared.

Meetings cont'd

A record of any professional or personal interest that may make it difficult for a trustee to fulfill their duties impartially, or may create an appearance of impropriety, with any item on the agenda for that day's meeting is to be noted in the minutes of the meeting. Specifically:

- If a trustee is in any way, directly or indirectly, interested in a proposed transaction or arrangement with the organisation, s/he must declare the nature and extent of that interest to the Board or Committee;
- If a declaration of interest proves to be or becomes inaccurate or incomplete, a further declaration must be made;
- Any required declaration of interest must be made before the organisation enters into the transaction or arrangement;
- A declaration is not required in relation to an interest of which the trustee is not aware or where the trustee is not aware of the transaction or arrangement in question. For this purpose a trustee is treated as being aware of matters of which s/he ought reasonably to be aware.

If a director states a conflict of interest s/he will normally be requested to leave the meeting while the relevant agenda item is discussed.

Potential Conflicts of Interest

A charity may pay and offer other material benefits to one or more of its trustees to provide services to the charity where the trustee board reasonably believes it to be in the charity's best interests to do so. The services in question must be ones which the charity trustee provides in addition to carrying out normal trustee duties. Any such proposal would be treated on a case for case basis and would only be approved subject to compliance with the governing document and Charity Commission guidance.

Where an individual is not part of the decision making process, there is no direct conflict of interest. However, where he/she has a relationship with the organisation, or individual trustee, the perception could arise that the trustees have not acted in the organisation's best interests, because of this.

Managing Conflicts of Interest

To manage these issues, the Board will ask themselves the following questions:

- Is this the best use we might make of our limited resources ?
- If so, might anyone else be able to provide this service ?
- If there are others, in terms of cost, quality, availability etc, who would be the best provider ?

Policy Title

CONFLICT OF INTEREST POLICY continued

Recording Decisions

Conflicts of interest will be recorded in the minutes, together with the key points and decision(s) made, in sufficient detail to enable a reader to understand the issue and the basis on which the decision was made.

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Policy Title

ENVIRONMENTAL SUSTAINABILITY POLICY

Aims

We will reduce and effectively manage our impact in a responsible manner, by ensuring that environmental considerations are integrated into decision making. Risk assessment will be used to identify potential environmental risks and where these are identified, strategies will be implemented to eliminate or minimise these risks.

Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of the Charity. Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Our Responsibility

None of us can save the planet alone, but all of us can do something and, as a charity, we should and it not only saves money but may earn income too.

We shall:

- Endeavour to create and adopt an effective environmental policy / climate change action plan;
- Appoint an 'environmental champion' to encourage everyone to adopt the ideas in our policy and come up with their own.
- Carry out an environmental audit or energy efficiency tests.
- Include an environmental statement in the Trustees' Annual Report.

Impact Upon the Environment

We shall have regard to how the charity, its activities and Centre users have an impact on the environment and use our best endeavours to mitigate such impacts, for example:

- **Air emissions** - boilers and workshops.
- **Land contamination** - oil and chemical storage.
- **Waste disposal** - waste electrical and electronic equipment (WEEE), hazardous materials and clinical wastes.
- **Water discharges** - kitchens, offices, cleaning and activities.
- **Resource use** – energy, water and facility supplies.

Managing the Impacts

We aim to manage these impacts by adopting the most appropriate of the following methods:

Managing the Impacts continued

Eliminate	Reduce	Re-Use	Recycle	Dispose
Avoid producing waste in the first place	<u>Minimise</u> the amount of waste you do produce	Use items as many times, as possible	Recycle what you can only after you have re-used it	Dispose of what's left in a responsible way
Best			Worst	

Considerations

The trustees will give consideration to the following ideas and encourage users and others to do likewise:

Materials and Resources

Consider installing recycling bins.

When ordering stationery, fundraising resources etc, do so in bulk. It costs less and reduces transport costs.

Where practicable buy products manufactured from recycled waste.

For fundraising, buy items such as running vests made from recycled material and poly bags that are biodegradable and rather than printing leaflets, posters, fundraiser packs, etc create digital versions - not only more eco-friendly, but these are also easier to share and cost less.

Find eco-friendly and charity specific suppliers (refer "Green Providers Directory" and the Charity Eco Hub facebook page).

Unused or single copied paper should be recycled as scrap paper.

For sensitive or confidential information, use a crosscut shredder, then recycle it.

Double sided printing and back to back photocopying should be undertaken where practicable.

Don't automatically print e-mails and documents. Retaining them on the hard drive reduces toner and paper usage, and you can find them again, if you need to.

Make use of e-mail in preference to hard copy mail. For example, for distribution of minutes of meetings. This not only avoids wasting resources but is cheaper and quicker.

Materials and Resources continued

Encourage the use of water in jugs at meetings rather than plastic water bottles. Make your own 'posh water' by adding slices of orange, lemon, cucumber, strawberry, whatever.

If you need a water bottle for car/train journeys, the gym etc make it a re-usable one.

Where water dispensers are provided, consider installing those that draw and cool mains water, rather than bottled supplies.

Where possible encourage the use of fair-trade tea and coffee, and other products.

If it is practicable rechargeable batteries should be used, this is both economical and is far better for the environment.

Don't buy fruit/vegetables pre-packed – it's more expensive and creates plastic waste.

When you do buy loose fruit/vegetables, leave them loose and don't use plastic bags.

Buy UK, ideally local, instead of overseas produced food (and other materials) and try to buy in-season foods – it's cheaper, healthier, reduces air miles and supports local businesses.

If you do need to use disposable plates/cutlery at an event, buy cardboard not plastic.

Managing Waste

Where cost effective, every effort should be made to recycle waste, such as cardboard, glass, paper and plastics.

The Hippo 'Grants Up for Grabs' scheme awards free waste disposal help to applications from UK charities and community groups.

Mobile phone, and toner and cartridge recycling can generate some income.

Include energy efficiency in your purchasing of electronic equipment - you'll use less energy, when you use them, and less waste when you dispose of them.

Some supermarkets have battery recycling boxes you can dump your batteries into, and most waste sites will take your electronics.

Hazardous items, such as oils, chemicals, fluorescent tubes, batteries etc, and electrical items must be disposed of properly and not simply dumped in the bin.

Managing Waste continued

Encourage the use of effective environmentally friendly cleaning products and other products such as e-cloths.

Energy Use

When you next review your utilities, consider purchasing renewable energy. It probably not as costly as you think and, even if it cost a bit more, price isn't everything.

Ensure that staff are aware of the benefits of energy efficient systems including benefits to themselves in their own homes.

Energy efficient lighting should be used to replace any tungsten bulbs.

People should be encouraged to turn off lights, televisions, monitors and other equipment when not in use. It's more environmentally friendly, saves money and helps reduce fire risk.

Where practicable, heating should be turned down or off in unoccupied rooms or areas, with heating reduced to 'frost protection' levels when unoccupied, eg.Christmas.

Ensure that doors and windows are not left open after cease work to save on heating costs and improve security.

Doors and windows should be draught proofed where practicable, loft spaces checked to ensure insulation is adequate, and pipes and hot water tanks should be properly lagged.

There are a whole series of office energy efficiency guides available from the Carbon Trust.

Water Use

Turn off or repair dripping taps, which can waste up to 10,000 litres of water a year.

Cut down on the amount of water in toilet cisterns by placing a water-filled bottle in there or a bag filled with stones.

In hot weather turning the tap on to gain access to colder water can be wasteful; therefore, a jug of the water run should be filled and placed in the fridge.

Emissions and Transport

Encourage drivers to not hard accelerate and brake, which wastes fuel. Cruising saves fuel and you get to your destination less stressed.

Ensure that staff, where practicable, make use of the public transport system.

Encourage shared transport use by staff where it is practicable.

Source goods and services locally, where this is cost effective.

Coordinate meeting timings and locations to minimise travel.

Review the work of meetings to reduce committee sizes and frequency of meetings and use online. It cuts travel, can save wasted work time and is always popular.

Avoid automatic attendance at meetings on every occasion and, instead staff should only attend when an active role is required.

If you travel by plane, book a non-stop flight, because these take the most direct route to the destination.

Fly economy - business class carbon footprint is typically double economy.

Suppliers

Whilst not an over-riding factor in decision making, we will seek to work with suppliers who share our aims and who seek to minimise their environmental impact. Equally, in deciding which types of supplies/products we purchase, we will be mindful that some are less damaging than others and will take this into account.

Investment

We will review our investment policy, with the intention of moving to ethical funds wherever reasonable to do so, by following Charity Commission guidance on balancing ethical investment and financial return. Where reasonably feasible, we will not invest in assets that are particularly polluting or damaging to the environment.

Management

Consideration could be given to nominating someone to lead and coordinate on environmental and waste management issues. Objectives could be included and monitored through the annual Business Plan.

Environmental Champion is :

Policy Title

ENVIRONMENTAL SUSTAINABILITY POLICY cont'd

Considerations continued

Communication

To be fully effective, environmental awareness and action must be cascaded down to users and stakeholders. For example, by:

1. Induction and awareness courses.
2. Role definitions and appraisals.
3. Posters, newsletters etc.

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Policy Title

HEALTH AND SAFETY POLICY

Statement of Intent

This is the Health and Safety policy statement of the Acton Trussell, Bednall, Teddlesley Hay Community Centre.

The Trust is committed to managing the Centre as a healthy and safe place for its users by identifying and mitigating risks, ensuring health and safety standards are maintained/improved, and encouraging users to conduct themselves and their activities in a safe and responsible manner.

Responsible Persons

As a facility relying on volunteers to operate the Centre and on users to organise and manage their activities it is understood that each and every person alike shares a personal responsibility for their own health and safety, notwithstanding that the Trust retains responsibility for maintaining the premises and its equipment in a safe and healthy condition.

Overall and final responsibility for health and safety rests with the Board of Trustees whereas day-to-day responsibility for ensuring this policy is put into practice rests with the signatory to the Hire Agreement, the person identified as the principal activity organiser or the nominated representative of the trustees.

To ensure health and safety standards are maintained/improved, the following people have responsibility for the following and to whom all health and safety concerns should be reported:

Reviewing & Updating Policies:	Philip D Deighton
Risk Assessments:	Les McDowell
Safety Training:	Alan Webster
Equipment Maintenance:	Les McDowell
Emergency Procedures:	P Deighton/S Calvert/B Hodgson
Safeguarding:	Sue Calvert

Arrangements

Location of H&S Law Poster:	Lobby Noticeboard
Location of First Aid Boxes:	Lobby / Kitchen / Change Room
Location of Accident Book:	Lobby
Location of Evac/Invac Procedures:	Lobby Noticeboard

The obligations of this Health & Safety Policy upon users are to be included within the Hire Agreement with regular user groups being required to attend periodic training sessions.

Policy Title

HEALTH AND SAFETY POLICY

Arrangements cont'd

Evacuation & Invacuation Procedures are to be prepared, agreed by Trustees, tested periodically and reviewed annually.

Activity organisers are to be required to advise their attendees at the commencement of the activity of the emergency procedures and the necessity not to block exits and other relevant public safety requirements.

The very young/old or disabled may be more at risk and visitors, such as the public and contractors, may need to be made aware of emergency procedures, such as fire evacuation.

Users of specialist equipment (such as heating and lighting, kitchen) will be provided with information on its safe use.

A Risk Register is to be prepared and updated regularly and reviewed annually by the Trustees.

Safety equipment (such as fire extinguishers, first-aid, exit signs) together with building systems and appliances are to be inspected, serviced and maintained at least annually with reports advised to the Trustees.

Recording and Reporting

Inspections, test reports and serious incidents will be reported to the Board of Trustees and any consequent action taken.

Depending on the nature of any incident, reporting obligations may be required to other authorities, such as to the HSE under RIDDOR and the Charity Commission

Version Control - Approval and Review

Version Number	Approved By	Approval Date	Main Changes	Review Period
v.1.0	Board	28-02-24	Initial Draft Approved	
v2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

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Policy Title

FOOD SAFETY POLICY

Introduction

This policy is based on the Food Standards Agency (Food safety for community cooking and food banks), WRAP redistribution labelling guide and redistribution labelling checklist.

It is intended for all users preparing and/or serving food on the premises.

Food Preparation

Using prepacked food products helps to make sure that the foods are properly labelled with instructions such as use-by dates, allergen information and storage guidelines.

When preparing meals, the 4 key safety issues are the 4Cs:

- Cleaning;
- Cooking;
- Chilling; and
- avoiding Cross-contamination.

Storage

It's very important to store food properly to keep it safe. Storing food in sealed containers and at the correct temperature protects it from harmful bacteria, stops objects falling into it, and avoids cross-contamination with other ingredients.

Here are some practical tips for when making food for large numbers of people:

- wash your hands regularly with soap and water
- always wash fresh fruit and vegetables before cooking or consumption
- keep raw and ready-to-eat foods separate
- do not use food past its use-by date
- always follow cooking instructions
- make sure food is properly cooked before you serve it
- ensure that food preparation areas are suitably cleaned and sanitised after use, and wash any equipment you are using in hot soapy water
- ensure frozen food is safely defrosted in a fridge before you use it
- keep food out of the fridge for the shortest time possible.

Food Temperature

Food that needs to be chilled, such as sandwiches should be left out of the fridge for the minimum possible time, and never for more than four hours.

After this time, any remaining food should be thrown away or put back in the fridge. If you put the food back in the fridge, don't let it stand around at room temperature when you serve it again. It should be eaten as soon as possible.

Policy Title

FOOD SAFETY POLICY continued

Use By Dates

Food cannot be sold, redistributed or consumed after the use-by date.

Best Before Dates

Food with a best before date can be legally sold, redistributed, and consumed after this date, if judged to be of sufficient quality to be donated and made available to be eaten.

This should include a visual inspection, checking for freshness and any damage. In some instances, torn or damaged outer packaging may be acceptable if the integrity of the primary pack is maintained.

Allergens

We provide details of the relevant 14 allergens as best practice to allow people with food allergies to make safe food choices.

Anyone making or donating foods should label it appropriately:

- What the item is.
- Date of production.
- Details of any allergens.

Higher Risk Foods

- raw milk
- raw shellfish
- soft cheeses
- pâté
- foods containing raw egg
- cooked sliced meats.

Risk Assessments

Guidance for users and food handlers on carrying out risk assessments is provided by the Health & Safety Executive (HSE), which also has a risk assessment template, an example risk assessment for food preparation, cooking and service.

Guidance is to be posted in the kitchen and food preparation areas for the information of food handlers with training provided where required.

Policy Title

FOOD SAFETY POLICY continued

Meat Containers

Food in containers is to be of food grade standard. This is packaging intended for multiple uses, such as Tupperware or takeaway boxes.

It is safe to re-use glass and plastic containers, as long as they are free from chips and cracks.

Containers are to be thoroughly cleaned to prevent cross-contamination with germs, allergens and physical contaminants.

If dishwasher safe, a dishwasher is preferable, but as a minimum containers should be washed thoroughly in hot, soapy water.

Version Control - Approval and Review

Version Number	Approved By	Approval Date	Main Changes	Review Period
v.1.0	Board	28-02-24	Initial Draft Approved	
v2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

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Introduction

The public disclosure policy, also known as the whistleblowing policy, aims to create a safe and open culture in which certain types of wrongdoing can be reported. The policy covers various types of misconduct, including offenses or breaches of the law, serious health and safety risks, fraud and corruption, and abuse of authority. Stakeholders are encouraged to report their concerns to the Board of Trustees, but there is also a designated whistleblowing lead for those who feel unable to do so. The policy provides protection for whistleblowers and ensures that all allegations are treated confidentially. Anonymous allegations are considered, but whistleblowers are encouraged to put their name to an allegation wherever possible. The policy also includes information on what to do if a concern does not qualify as whistleblowing and provides links to regulatory guidance and support for whistleblowers.

Our Principles

We aim to deliver support of the highest standards to our beneficiaries and to ensure that everyone is treated fairly and kept safe. However, we recognise that, even in the best run organisations, things can go wrong.

What is Whistleblowing ?

A whistleblower is a stakeholder who reports certain types of wrongdoing.

This procedure applies, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law.
- Alleged miscarriage of justice.
- Serious Health and Safety risks.
- The unauthorised use of public funds.
- Possible fraud and corruption.
- Sexual, physical or verbal abuse, or bullying or intimidation of stakeholders
- Abuse of authority.
- Other unethical conduct.

The wrongdoing disclosed must be in the public interest. This means it must affect others, for example the general public.

Whistleblowers have specific substantial protection in law if, say, they were to be treated unfairly or lose their job, because of 'blowing the whistle'.

Concerns can be raised at any time about an incident that happened in the past, is happening now, or will happen in the near future.

Reporting Concerns

If you see or hear about something that you think is wrong, you should report it to a Trustee and he/she will take action to respond to your concerns.

However, we recognise the possibility that an individual may feel unable to do so. Except in an emergency, you should do so only during office hours Monday to Friday and ideally make contact by email first:

Name	Telephone Number	Email Address
Sue Searle	07729-595460	suesearle65@outlook.com

Whether you provide information verbally, or in writing, it should contain as many relevant facts and detail, as are available. Such as:

- Your name and how you wish to be contacted, such as a telephone number or e mail or postal address;
- Background - relevant dates and the names and positions of anyone who may be able to contribute information;
- You will not be expected to prove any allegation, but you do need to provide information to establish the basis for it.

If you aren't sure what to do, or are too scared to report your concern, **Protect** is a charity that supports whistleblowers by providing advice on their website. You can contact them by phone, email or by writing to them. The Government also produces advice for whistleblowers, or you can email the Charity Commission at whistleblowing@charitycommission.gsi.gov.uk.

Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal your identity unless you wish this to be done.

However, if the matter is subsequently dealt with through other procedures, or if the allegation results in court proceedings then you may have to give evidence in open court, if the case is to be successful.

Anonymous Allegations

We encourage whistle blowers to put their name to an allegation wherever possible, as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations may be considered, taking into account the following.

- The seriousness of the issue raised;
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Policy Title

PUBLIC DISCLOSURE POLICY continued

Untrue Allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so, even if the allegation is not substantiated by an investigation.

However, disciplinary action may be taken against someone who makes an allegation without reasonable belief that it is in the public interest to do so. That is making an allegation frivolously, maliciously or for personal gain, where there is no element of public interest.

Investigation Procedure

The Trustee to whom the wrongdoing is formally reported must open a confidential file with full details of the whistleblower and the information they provide.

The whistleblower is to be interviewed in private and asked to confirm the statements made.

The Trustee shall make discreet enquiries in an attempt to validate the allegations, receiving advice from competent third parties if necessary and entering details on the file. Enquiries should be completed expeditiously.

If validated, the Trustee shall report the matter to the Board of Trustee making sure that the whistleblower’s identity remains confidential. The Board shall determine the action to be taken.

If the allegation cannot be validated then the Trustee shall advise the whistleblower accordingly, the fact entered upon the file and the matter closed.

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v2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

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Policy Title

DATA PROTECTION POLICY

Introduction and Scope

This policy outlines the Trust's commitment to data protection and compliance with the UK Data Protection Act. The purpose of this policy is to ensure that all personal data held by the charity is processed lawfully, fairly, and transparently, and that the rights of data subjects are protected. This policy applies to all individuals working on behalf of the Trust, including trustees, staff, users, stakeholders and volunteers.

Data Protection Lead

The Trust has appointed a Data Protection Lead who is responsible for overseeing data protection and leading on any incident investigation and reporting. The Data Protection Lead will also ensure that all trustees, staff, users and volunteers are provided with any induction, on the job or other training and made aware of their data protection responsibilities.

LEAD TRUSTEE IS:

Les McDowell

Data Protection

Data protection is the practice of safeguarding personal information by applying data protection principles and complying with the Data Protection Act. The Data Protection Act is a UK law that regulates the processing of personal data. The UK Information Commissioner's Office (ICO) provides guidelines on data protection that the Trust will follow.

Data Protection Principles

Data is:

Processed lawfully, fairly and in a transparent manner.

There are several grounds on which data may be collected, including consent.

- We are clear that our collection of data is legitimate and we have obtained consent to hold an individual's data, where appropriate.
- We are open and honest about how and why we collect data and individuals have a right to access their data.

Collected for specified, explicit and legitimate purposes and not used for any other purpose.

- We are clear on what data we will collect and the purpose for which it will be used.
- Only collect data that we need.
- When data is collected for a specific purpose, it may not be used for any other purpose, without the consent of the person whose data it is.

Data Protection principles continued

Adequate, relevant and limited to what is necessary.

- We collect all the data we need to get the job done.
- And none that we don't need.

Accurate and, where necessary, kept up to date.

- We ensure that what we collect is accurate and have processes and/or checks to ensure that data which needs to be kept up-to-date is, such as beneficiary, staff, user, trustees or volunteer records.
- We correct any mistakes promptly.

Kept for no longer than is necessary.

We understand what data we need to retain, for how long and why.

- We only hold data only for as long as we need to.
- That includes both hard copy and electronic data.
- Some data must be kept for specific periods of time (eg. accounting, H&SW).
- We have a review process that ensures data no longer needed is destroyed.

Processed to ensure appropriate security, not only to protect against unlawful use, but also loss or damage.

Data is held securely, so that it can only be accessed by those who need to do so. For example, paper documents are locked away, access to online folders in shared drives is restricted to those who need it, IT systems are password protected, and/or sensitive documents that may be shared (eg payroll) are password protected.

Data is kept safe. Our IT systems have adequate anti-virus and firewall protection that's up-to-date. Staff understand what they must and must not do to safeguard against cyber-attack, and that passwords must be strong and not written down or shared.

Data is recoverable. We have adequate data back-up and disaster recovery processes.

Individual Rights

We recognise that individuals' rights include the right to be informed, of access, to rectification, erasure, restrict processing, data portability and to object.

Use of Imagery / Video

All imagery is protected by copyright and cannot be used without the consent of the owner, usually the person who took the image. It is acknowledged that consent may be required from the individuals in images of individuals and small groups, which may well fall within the Data Protection Act. For what purpose was the original image taken ? If it was for one purpose, such as personal use, it cannot be used for another without the consent of the individuals concerned

- Is the image sensitive personal data? If it is, do you have the individual's consent ?
- For small groups and individuals, has an image consent form been used ?
- When using images of children, or people who may not be competent, do you have valid consent ?
- When using images of children or other vulnerable people, are you confident your use of the image will not place them at risk ? Particularly, if it is to be used publicly, such as in the Media or on the web.
- When photographing large groups, have the individuals been given a chance to opt out of the photograph ?
- Has the person/people in the image been told how the image will be used ?
- Are you using the image according to how the person/people were told it would be used ?

Data Breach

A breach is more than only losing personal data. It is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

We will investigate the circumstances of any loss or breach, to identify if any action needs to be taken. Action might include changes in procedures, where there will help to prevent a re-occurrence or disciplinary or other action, in the event of negligence.

We will notify the ICO within 72 hours, of a breach if it is likely to result in a risk to the rights and freedoms of individuals. If unaddressed such a breach is likely to have a significant detrimental effect on individuals. For example:

- Result in discrimination.
- Damage to reputation.
- Financial loss.
- Loss of confidentiality or any other significant economic or social disadvantage.

Policy Title

DATA PROTECTION POLICY continued

Fundraising

We will ensure that our fundraising complies with the Data Protection Act and ICO guidelines and also the Fundraising Regulator guidelines including, if applicable, direct marketing and PECR. We will respect the privacy and contact preferences of our donors.

We will respect the privacy and contact preferences of our donors. We will respond promptly to requests to cease contacts or complaints and act to address their causes.

We have adopted and comply with the Charity AI Ethics & Governance Framework and ICO AI guidance.

Special Provisions

It is noted that special arrangements need to be made in respect of Children under 13 years of age, People regarded as Not Competent, Vulnerable Groups, Special Category (Sensitive) data and Privacy And Electronic Communications.

Version Control - Approval and Review

Version Number	Approved By	Approval Date	Main Changes	Review Period
v.1.0	Board	28-02-24	Initial Draft Approved	
v2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

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Policy Title

SOCIAL MEDIA POLICY

Purpose

Social media use is governed by a number of laws. Equally, we have a very positive reputation and this is extremely important in delivering our charitable work. The policy will help to understand how to use social media effectively and well, and avoid problems.

The Law

Use of social media is covered by a number of UK laws and social media has no national boundaries, so your posts may well be read in other countries. As a very simple guide, you may be breaking the law, if you post (or potentially repost) anything that may fall into any of the following categories:

- Harassment – not leaving someone alone.
- Menacing behaviour – writing something that may scare someone.
- Threatening behaviour – making someone believe that you were going to hurt them.
- Grossly offensive comments – making deeply unpleasant comments about a sensitive issue.
- Libel - a post is potentially libellous, if it is a false statement and may damage someone's reputation.
- Defamation - users may be sued for defamation, if they post an unsubstantiated rumour about someone
- Data protection – breaching an individual's right to privacy.
- Copyright – posting material without permission that is owned by another person or organisation.

Our Spokesperson

We have a number of spokespeople to represent the Trust. If you're unsure if you are one or not, you're not, so don't.

Even if you do not speak on behalf of the Trust you are personally responsible for all online content you publish. If you were to post on an issue related to our work, people who know you may think you were speaking on our behalf and those that don't, may think so too, if you were to use our logo or refer to us in your posts.

Do not breach privacy or security. Do not post personal information, such as someone's home address, and never post about individuals without their consent, unless there is little if any doubt it would be given. Remember that individuals who may not be fully competent, perhaps due to a disability or illness, such as dementia, may not be able to give consent.

Don't make it easy for criminals, by posting information that they might use. For example, that the lock on the front door has broken (again), you will be taking a lot of cash to the bank or working late on your own.

Clearly state your opinions are your own. If you are not a spokesperson, make clear that your comments, opinions or tweets are your own, so these won't be interpreted as our position. This statement could appear on your profile. On X (Twitter), this should be in the 'Profile' section, which can be edited under 'Settings'.

Appear human. Observing certain guidelines does not mean you have to sound like a robot. Speak in the first person; bring your personality to the forefront.

Write using our 'tone of voice'. Where possible, when communicating with the public, media or government, use our 'tone of voice'.

We are passionate in supporting our community and like a laugh as much as anyone else, but we're professional, courteous, positive and respect the right of others to hold opinions that are different to ours.

Abusive Posts. A troll is someone who intentionally causes upset, harm, or offence by provoking people online. Be careful not to confuse a troll with someone who is critical and/or upset. There will be people who have valid concerns or have a genuine complaint that may come across as angry and irate. Look at their social media to see they post and how they reply. Trolls often have a profile picture that is an object, rather than a person, or no profile image at all.

People who are abusive are usually trying to provoke a reaction from you, so don't give them what they want. Besides, you are unlikely to convince them they are wrong. Tweet or post separately to address the issue. You can also adjust your settings to not allow replies, use the relevant abuse reporting system, block them and, if you think they are committing a crime, report them to the police.

Disagreeing. If you disagree with something and feel you should respond, always be courteous and do not personalise your response. Focus on the issue, not the person who wrote the post. If you simply 'poke someone in the chest', you won't get a positive response. And no issue was ever solved without a solution, so offer one.

Text and Symbols. Using emoji, 'lol' etc can help add humour to a fun post, but don't use if you are making an important point, as this would trivialise your message. And using multiple exclamations, and lots of capital letters, bold and underling is 'shouting', you would not be taken seriously.

Think first, upload/tweet after. If something gets online, it stays there for a long time. Tweets now appear in Google search results. So that off-hand tweet or opinionated blog post can all be traced back to you.

Ask for a second opinion. Not sure if and how you should tweet or comment on something ? Contact one of our spokespersons for advice.

Be politically neutral. It is essential that we are not only politically-neutral, but seen to be. We aim to influence the government and its agencies positively in support of our community and criticising them won't help us do that. Equally, we treat all recognised political parties with respect and support any of their initiatives that support our own aims, but we do not actively support or promote any individual party.

Ethics. We are a charity, so appearing to support or endorse, even inadvertently, smoking, getting drunk, political parties for example, would be inappropriate. Posts should always be respectful of beneficiaries and portray them in a way they would wish to be, and not cause embarrassment, offence or alarm.

Respect copyright, fair use and other laws. Using imagery? Make sure you acknowledge the source and observe copyright laws. Images of crowds at events don't require the approval of each individual, but an image where a limited number of individuals are the subject matter of the image do. For example, an image of a band at a large cultural event, which includes the audience, doesn't require everyone in the audience's approval, but a small group of people, where they are clearly the subject of the image would. It is particularly important that you obtain permission, if you wish to use images of children or vulnerable adults.

Don't be offensive. To anyone, for any reason. Two good tests:

- If you wouldn't say it to their face, don't say it at all and:
- If you wouldn't want your mother to read it, don't write it.

Guidelines cont'd

Extremist views, sexism, pornography/distressing or otherwise offensive imagery, racial/ethnic or religious discrimination, homophobia or disparaging comments against any minority group, such as the disabled or mentally ill would not be acceptable, under any circumstances, ever.

Meaning. Remember that the majority of our communication is through body language and voice tone/loudness etc, and the amount of written text in social media can be limited, so meaning can easily be lost. What may appear light hearted and funny to you, may potentially come across very differently on social media.

And take into account potential social and/or cultural differences in your audience who may be more sensitive to particular issues or subjects than the wider population.

Moderation of Posts on Our Social Media. We act as a platform, both online and off, for our community to debate issues that matter to them and we actively encourage diversity of opinion. We believe that open, honest debate can help to address divisions and just because we don't agree with something, doesn't necessarily mean that we would remove it. For example, critical comments about our work are rare but, whilst we always respond in a balanced and measured way, we do not remove these, even when we do not necessarily agree with these, subject to the guidelines below.

The community has diversity of views, some strongly held. There is nothing wrong in holding strong views, but that does not automatically make alternative views offensive. In general, as long as a post does not break the law, is a genuine contribution to a debate and is not offensive, we would not usually remove it. Specifically, we will take down any post that falls into the categories below:

- Anything we believe may fall into any of the categories in the section above titled 'The Law'.
- We would remove any post that contained views that we feel the majority of reasonable people would consider to be offensive.
- The section 'Don't be offensive' above is not an exhaustive list, but does provide guidance on what would normally be considered offensive.
- The use of 'swear words' would normally also be considered offensive;
- As would derogatory comments about an individual or organisation.
- Any post that is irrelevant to our work and the online conversations being held.

Guidelines cont'd

We may also block those posting such material and/or report the issue to the relevant authorities.

Take Down Process

Authority to remove posts has been delegated, as follows:

- Immediate take-down of posts that are obviously unacceptable -
TO BE NOMINATED
- Take down of posts that may be unacceptable -
TO BE NOMINATED
- Any request to take down a post is to be managed by the above named.
- Before a post is taken down, screenshot or otherwise record the post.

Distribution

This policy is to be brought to the attention of staff and volunteers on appointment, and relevant elements included in group moderation statements, editorial policies, staff handbook, as appropriate.

Version Control - Approval and Review

Version Number	Approved By	Approval Date	Main Changes	Review Period
v.1.0	Board	28-02-24	Initial Draft Approved	
v2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

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Policy Title

ANTI-MONEY LAUNDERING POLICY

Scope

Our charity is committed to preventing money laundering and complying with all relevant legislation and regulations. We have implemented due diligence measures and carry out risk assessments, put in place internal controls and monitoring systems to prevent money laundering.

Commitment

This policy statement provides a framework for how our charity will deal with the threat of money laundering. It is a useful tool for focusing our minds and those of our stakeholders to make us constantly aware of the risks. We will review and update this policy regularly to ensure it remains effective and relevant to our charity's operations.

Named Individuals and their Responsibilities

We have appointed a nominated officer who is responsible for ensuring that the charity's anti-money laundering policies and procedures are effective, and for reporting any suspicious activity to the relevant authorities. All employees and volunteers must be aware of their responsibilities under this policy.

THE NOMINATED OFFICER IS:

Sue Searle

Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of the Charity. Its requirements are reflected in other policies and procedures, agreements and contracts, as necessary.

Due Diligence Measures & Monitoring Checks

We have procedures in place for identifying and verifying organisations and individuals, such as contractors, partners and donors, which include obtaining identification documents, conducting risk assessments and monitoring checks. We will keep records of all due diligence measures carried out, including identification documents, risk assessments, policies, controls and procedures, and training records.

Training

We will ensure that all employees and volunteers are trained and aware of their responsibilities under this policy.

Policy Title

ANTI-MONEY LAUNDERING POLICY continued

Monitoring Controls

We have put in place monitoring controls to ensure that our policies and procedures are being carried out effectively.

Sanctions

it is against the law to receive money, goods or economic resources from, or send these to an individual or organisation subject to financial sanctions. In the event of any grounds to suspect the charity may be involved, or may become involved with a sanctioned individual, organisation or work in a sanctioned country, the first step is to read the OFSI guidance, then seek and comply with their advice.

Record Keeping

We will keep records of all customer due diligence measures carried out, including donor/contractor/partner identification documents, risk assessments, policies, controls and procedures, and training records.

Version Control - Approval and Review

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v.1.0	Board	28-02-24	Initial Draft Approved	
v.2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

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Policy Title

FINANCIAL CONTROL POLICY

Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of our charity. Its requirements are reflected in other policies and procedures, agreements and contracts, as necessary.

Separation of Duties

No one person may both authorise and pay any payment or transfer. For example, an on-line banking payment or credit card transaction.

Conflict of Interest

No individual may:

- Authorise or make changes to his or her own pay or personnel entitlements or records; or
- Make payments or enter into contracts with family members or organisations in which they have an interest, either directly or through a close family member.

Contracting

A robust contracting process is to be implemented with major contracts openly tendered, subject to board scrutiny and approval, and retendered every 3 to 5 years. Contracts and other agreements should be recorded in a simple contracts register and each reviewed annually to ensure these continue to meet the charity's needs and offer good value for money.

Budgeting

The Board is to scrutinise and approve an annual budget. The budget should include prudent income forecasts that have been tested to confirm that there is a reasonable expectation of securing the funding planned for. All expenditure must be based on best estimates and, where appropriate, have regard to historical costs and/or intended works.

Financial Reporting

Up to date financial reports should be submitted to the Board regularly. Reports should use simple clear English that all board members will be able to understand and.

- Explain the charity's current and likely future financial position.
- Focus on the key issues and risks, the action being taken to address these and the expected outcome.
- Highlight any significant deviations from budget or funding shortfalls.

Financial Management

Budget holders are to review financial reports, investigate any variances to budget/forecast and unusual or unexpected transactions that cannot be adequately explained and take appropriate action. Any significant issues should be reflected in reports to the Board.

Cash

- Cash is secured under lock and key.
- Access is restricted to those who need access.
- A cash limit is set that is within the insurance limit.
- Cash is not sent through the post.
- Cash and cheques are banked promptly, particularly if significant sums of cash are received.
- Cash is banked 'gross' – that is income is not netted off against other expenditure. All transactions must be recorded.
- Cash is kept separate from personal money and is never used for personal expenditure.
- Where significant sums are to be banked, two individuals escort the money and it is transported by car, not on foot. In the event of a robbery, the money is to be handed over without resistance and reported to the police.
- Cash payments are to be avoided wherever possible.

Banking

Bank Accounts. Bank, savings and any other form of investment are only to be opened with the written approval of the Board.

- The account is to be reconciled at least monthly.
- The bank reconciliation, statement, cashbook, chequebook and any other supporting documentation are cross checked.

These checks are to be made by someone other than the person concerned with the original recording of the transactions.

Bank mandates, account signatories and e-banking access are to be kept up-to-date and individuals may only be added with the written approval of the Board. The list of people with access and their access levels are to be reviewed annually, as part of the audit preparation process.

Banking continued

Cheques. All cheque stubs should be completed fully. Payments exceeding:

- £x require y signatures.
- £y require ? signatures, one of whom must be the Trust Chairman or Vice Chairman

Cheque books are to be secured under lock and key, must be used in sequence and only one cheque book is to be held at any time.

Income

Regular checks are to be carried out to ensure that records are being accurately maintained and that there are no discrepancies in the accounting records.

Specifically, that:

- Records of cash and cheques received agree with bank paying-in slips;
- The paying-in slips equate with the bank statements, both in terms of amount banked and date of credit; and
- All transfers or other direct payments into the bank can be identified and verified against paperwork.

Restricted funds - are to be accounted for separately to ensure these are only used in accordance with donors' restrictions.

Multi-year funding - is to be accounted for in a way that ensures future year funding is not inadvertently spent in the current accounting year.

Anonymous or suspicious donations - are to be subject to appropriate due diligence to minimize the risk of fraud.

Expenditure

Delegation of Authority. Each budget line should have a specific nominated budget holder who, together with a second trustee signatory, has the authority to approve expenditure against that budget. Expenditure may not be authorised beyond the limit of the delegated budget without appropriate approval by the Board.

This may be sub delegated, subject to appropriate approval by the Board. However, responsibility for all expenditure remains with the budget holder and, before delegating authority, he or she is to ensure that the individual to whom a delegation is made is issued with any necessary instructions and is competent.

Expenditure continued

Approval and Payment. The prior approval of the Board is required for any projects or proposals in excess of £1,000 that are not included in the business plan and funded in the budget and for any that will result in a budget being overspent. All expenditure must be properly authorised, represent good value for money and be on appropriate items or services. Delegations and any subsequent changes are to be issued in writing and clearly specify budget lines and limits.

Authorising officers are to check invoices received against orders and confirm that the goods or services have been received, are correctly priced, with any discounts or credit notes taken into account and sales tax (eg VAT) excluded if appropriate, before authorising payment.

The Treasurer is to check each invoice before payment. Any that have not been appropriately authorised should be rejected and remain the personal responsibility of the individual who incurred the expenditure.

Payment Procedures. Payments systems, such as cheque books, credit cards and on-line systems and passwords should be adequately safeguarded.

Physical items, such as e banking encryption devices and cheque books should be kept under lock and key when not in use. Passwords should not be written down or shared, and should be changed regularly and if compromised.

Accounting IT systems should be routinely backed up and back-ups stored off site in case of fire.

Cheques should always be crossed, blank cheques never signed and mandates restricted to only those who need to sign cheques. Credit card limits should be kept as low as possible.

Travel Expenses. Claims should be countersigned by the Treasurer to confirm that the journey was valid, undertaken and the amounts claimed were reasonable in the circumstances. Expenses claims are to be checked by the Treasurer to ensure that the expenses policy has been complied with.

Novel and Contentious Expenditure. This is defined as follows:

- **Novel** - does not meet the letter of our regulations. That is, using a budget for a purpose for which it was not intended. For example, payment of an honorarium to an individual, when there is no such provision in the pay policy. Or exceeding permissible limits. For example, payment of subsistence rates or class of hotel accommodation that exceed the limits in the expenses policy.

Expenditure continued

- **Contentious** - meets the letter of the relevant policy, but where the need for it or the cost involved may be questioned. For example, where subsistence has been approved within agreed limits, but alcohol or other inappropriate expenditure is claimed for.

Payment of any expenditure which may be novel or contentious requires the prior approval of the Board.

Assets

Fixed Assets and Equipment. Purchases of assets that have a life expectancy of, and will provide benefit for, more than one financial year may be treated as capital items and their value written down over the lifetime of the asset.

In general, the minimum value for an item to be treated as a capital asset is £300.

- A fixed asset register is maintained and reviewed annually.
- Items are allocated inventory codes and marked accordingly.
- Subsequent to the annual review, insurance cover is reviewed to prevent being under or over insured.
- No one is to remove assets or items of equipment without prior approval from the Board.

Cryptoassets. In deciding whether we will accept and hold donations of cryptoassets, or not, we will assess the opportunities, benefits, risks and limitations. In doing so, we will ensure that we either have or source relevant expertise. If we decide to accept cryptoassets, we will implement appropriate financial and other controls, and manage the risk on an ongoing basis.

Other Issues

Fraud/Bribery. If fraud or bribery is suspected it is to be brought to the immediate attention of the Board.

Hospitality. Employees may be offered hospitality in the form of being taken out to drinks or events, or gifts by suppliers or others. It is essential that this is entirely above board and can be demonstrated to be so. Employees and board members may only accept hospitality or gifts, which are worth less than the value of £50. Such gifts are to be declared in the Hospitality Book, held by the Treasurer, unless these are trivial and of value of less than £10. The Hospitality book is to be reviewed and signed off by the Chairman annually, as part of audit preparation.

Other Issues continued

Losses. Any losses are to be investigated. The amount and circumstances of the loss are to be determined and, in particular, whether the loss arose from weaknesses in procedures and/or a failure to apply procedures correctly. Appropriate action is to be taken to ensure no further losses occur, arising from similar circumstances. The value of any item is to be at realisable value. Any loss must be approved for write off in line with the delegations from the Board. The loss is to be written off on the accounting system and the record of investigation and approval for write-off filed for audit purposes.

Records.

- Records are to be retained in accordance with the documents policy. In particular, cashbooks and other prime books of account are retained for 7 years and supporting vouchers for 18 months.
- A secure archive is identified and records kept under lock and key.
- The archive is organised to enable records to be easily identified and retrieved.

IT and Online Security

- Security software, such as anti-virus and firewalls, are to be kept up-to-date, preferably by automatic renewal.
- There are effective controls for authorising and managing access.
- Software updates are installed promptly.
- Passwords are strong, not shared and changed regularly.
- Data is remotely backed-up on a regular basis.
- There are disaster recovery procedures that would restore data quickly and fully enough; these have been tested.
- No sensitive financial information is to be entered into Large Language Model AI systems, such as ChatGPT or Bard.
- Financial information, including back-ups, stored on shared drives is accessible only to those who need to have access to it.
- Adequate security procedures are in place for online purchasing.
- Staff and volunteers are aware of what they need to do (and not do) to maintain online security.
- On leaving the organisation, an individual's accounts are to be disabled.

Policy Title

FINANCIAL CONTROL POLICY continued

Version Control - Approval and Review

Version Number	Approved By	Approval Date	Main Changes	Review Period
v.1.0	Board	28-02-24	Initial Draft Approved	
v.2.1	Board	29-05-24	Amendments Approved	Annually
v.2.1	Board	02-06-25	Reviewed & Agreed without Change	Annually

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Introduction

Whilst we make every effort to meet peoples' expectations, circumstances may arise where an individual has a concern and wishes to bring this to our attention. We will take all reasonable steps to resolve the situation, in everyone's best interests.

For very serious concerns, such as individual's safety being placed at immediate risk, take such action as is appropriate. For example, by calling the emergency services.

Informal Complaints

Anyone who has a concern should initially raise this with any trustee at the time, as this enables us to respond and deal with an issue quickly.

We will seek to resolve this and meet any reasonable expectations the individual may have, ideally to his or her satisfaction. If unable to, make a note of:

- The complainant's name and contact details, unless he/she is unwilling to provide these
- The nature of his/her concern and anything that he/she wished to be done about it.
- The circumstances surrounding the complaint, including when, where any action that was taken and the details of others who were present/involved.

Advise the complainant that their concern will be passed to the Board of Trustees.

Formal Complaints

Where an individual wishes to make a formal complaint, he/she should be provided with the email address of the nominated lead trustee for complaints and/or our registered address, as they wish.

LEAD TRUSTEE IS: Philip D Deighton philipdeighton@protonmail.com

Correspondence should be marked private and confidential. He or she should be provided with a copy of this policy by post or email. To help resolve the complaint as quickly and effectively as possible, the individual making the complaint should submit in writing as soon as possible details of the complaint and should include in it:

Formal Complaints continued

- Name, organisation (if relevant), address, telephone number and e mail. If they do not wish to be contacted in a particular way, please let us know and we will of course respect this.
- As much information as possible, such as what happened, where, when (date/time), who was present and any action taken, and by whom.
- What it is you felt to be unsatisfactory.
- What you believe should be done to address your concern.

Receipt will be acknowledged, if possible, within 7 working days. The complaint will then be investigated. If necessary, specialist advice will be sought. Where clarification or further information is felt to be necessary, the trustee will contact the person complaining to request this.

A response will be sent within 14 working days. If this is not possible, a holding reply will be sent after 14 days advising when we estimate the investigation will be completed. The complaint response will explain our findings and what action we will be taking/have taken, subject to the constraints of the Data Protection Act, which will almost certainly not allow us to disclose sensitive personal information.

If the complainant is not satisfied with the response, he or she may appeal the decision, by writing to the Trust Chairman, the contact details of whom will be included in our response. Appeals must be submitted within 28 days of our response to the complaint.

The appeal should be specific about why the individual feels the decision made was wrong and provide the facts and information necessary to demonstrate this.

A decision will be notified within 28 days and will be final.

Wider Action

Irrespective of the outcome of any complaint, we will consider if there is any requirement in respect of wider action and/or statutory reporting to the Charity Commission, H&SW Executive, other regulator, or the Police. Consideration will also be given to whether any changes should be made to policies, procedures, training etc to see if anything might reasonably be done to prevent a similar issue arising in future.

Anonymous Complaints

Anonymous complaints will be recorded and any facts available looked in to. However, in doing so we will be mindful that anonymous complaints can sometimes be malicious. Everyone involved in our work, even incidentally, has a right to complain and we will hold anyone accountable but, equally, individuals have a right to be protected from unsubstantiated and, potentially, malicious allegations.

Consequently, anyone wishing to complain is strongly encouraged to provide the information requested above and his or her contact details. This will also allow us to advise him or her of the outcome.

Potential Compensation Claims

If a complaint may potentially result in a claim for compensation, such as damage or loss to property, or personal issue, our insurers are to be notified.

Confidentiality

The complaint will be treated as confidential and any communication on this issue, including responding to the complainant, will be subject to compliance with the Data Protection Act.

Availability

This policy is to be made publicly available and given to anyone who advises that he/she wishes to submit a complaint.

Version Control - Approval and Review

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