



Brookvale
Community Association

POLICIES AND PROCEDURES

The Trustees

Brookvale Community Association

*** Issue & Amendment Record ***

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Anti-Slavery Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Association has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

We expect the same high standards from all of our contractors, suppliers, customers and partners, and as part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Trustees, Volunteers and Employees

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or Chair of Trustees OR report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Chair of Trustees

Credit Control Policy

Purpose

This policy covers: payment methods and terms; refunds, exchanges and complaints; cancellations and transfers of event bookings; and the credit control procedure.

The purpose of this policy is to ensure that:

- money owed to BCA is collected in a timely and appropriate manner;
- that trustees, staff and volunteers understand when they can and cannot extend credit;
- there is an agreed basis for informing customers of what credit terms are available to them;
- credit is not extended to bad debtors.

Roles & Responsibilities

This policy applies to all hirers of Brookvale Village Hall and anyone acting for and on behalf of BCA including but not limited to the Booking Agent, Trustees, volunteer and trustee.

Publicising BCA's credit terms

Credit terms must be specified on all invoices and statements and on all of *BCA's* marketing materials, including the website.

Full terms, fees and procedures for the hire of the hall can be found [here](#)

Credit control procedure

1. All new customers (i.e. with no history of buying from *BCA*) will be subject to *BCA's* standard credit terms and *BCA* will accept their booking/order:
 - One off – payment in advance
 - Regular Hires – 14 days from invoice
 - Exceptions can be made to 30 days credit from invoice
2. No-one may accept a booking for the hall without first checking whether there are any outstanding invoices for any product or service due to be paid by the customer.
3. If the outstanding invoice is within the period specified in *BCA's* terms and the customer has a record of prior payment, the booking/order may be taken.
4. If the outstanding invoice is over the period specified in *BCA's* terms, the customer must be informed that the booking/order may be refused until the previous invoice has been paid (unless the relevant trustee gives approval to accept the booking/order). This applies to all products and services. If a customer says that they have paid, *BCA* will put their booking/order on hold and the customer will be asked for the payment details. These will then be investigated. If the customer has paid, *BCA* may confirm the booking/order.
5. Customers are responsible for proving that they have paid.
6. In the event that the invoice has not been paid because the customer is in dispute with *BCA*, the matter must be referred to the Trustees.
7. If anyone is in any doubt as to whether credit should be extended, they should refer to the Trustees.
8. The decision as to whether a customer constitutes an ongoing credit risk will be taken by the members of the Trustees.
9. If a customer is querying an invoice, the Trustees will resolve.

10. The Treasurer is responsible for ensuring that payments are recorded against customers, issuing statements, chasing bad debtors and accruing interest where appropriate.
11. The Trustees will review on a quarterly basis the outstanding debtor list.
12. In certain circumstances, persistent or high levels of bad debt will be referred to a debt collection agency.
13. *BCA's* aged debtor list target is 30 days from date of invoice.

Data Protection Policy

Purpose

This policy sets out BCA's commitment to ensuring that any personal data, including special category personal data, which is processed is done so safely and in compliance with data protection law. BCA ensures that good data protection practice is embedded in the culture of the trustees, staff and volunteers.

In producing this policy, BCA has regard to guidance issued by Information Commissioner's Office.

Roles & Responsibilities

This policy applies to all personal data processed by BCA. The Trustees is responsible for the maintenance of this policy.

All members of BCA must comply with this policy.

There are no exceptions to this policy.

Data Protection Principles

When processing personal data, BCA ensures that:

- it is processed lawfully, fairly and in a transparent manner in relation to the data subject
- it is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- it is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- it is all accurate and, where necessary, kept up to date and that reasonable steps are taken to ensure that personal data that are inaccurate are erased or rectified without delay
- it is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- it is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

BCA will facilitate any request from a data subject who wishes to exercise their rights under data protection law as appropriate, always communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

Approach

BCA will:

- ensure that the legal basis for processing personal data is identified in advance and that all processing complies with the law
- not do anything with data that would not be expected given the content of this policy and the fair processing or privacy notice provided

- ensure that appropriate privacy notices are in place advising staff, volunteers, customers and suppliers and others from time to time, how and why their data is being processed and in particular, advising data subjects of their rights
- only collect and process the personal data that it needs for purposes it has identified in advance
- ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible
- only hold onto personal data for as long as it is needed, after which time it will securely erase or delete the personal data
- ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely

BCA will ensure that all persons who handle personal data on its behalf are aware of their responsibilities under this policy and other relevant data protection and information security policies, and that they are adequately trained and supervised.

Breaching this policy may result in disciplinary action for misconduct, including dismissal. Obtaining (including accessing) or disclosing personal data in breach of BCA's data protection policies may also be a criminal offence.

Data Subject Rights

Subject Access: the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing
- the categories of personal data
- the recipients to whom data has been disclosed or which will be disclosed
- the retention period
- the right to lodge a complaint with the Information Commissioner's Office
- the source of the information if not collected direct from the subject, and
- the existence of any automated decision making

Rectification: the right to allow a data subject to rectify inaccurate personal data concerning them.

Erasure: the right to have data erased and to have confirmation of erasure, but only where:

- the data is no longer necessary in relation to the purpose for which it was collected, or
- where consent is withdrawn, or
- where there is no legal basis for the processing, or
- there is a legal obligation to delete data

Restriction of processing: the right to ask for certain processing to be restricted in the following circumstances:

- if the accuracy of the personal data is being contested, or
- if our processing is unlawful but the data subject does not want it erased, or
- if the data is no longer needed for the purpose of the processing but it is required by the data subject for the establishment, exercise or defence of legal claims, or
- if the data subject has objected to the processing, pending verification of that objection

Data portability: the right to receive a copy of personal data which has been provided by the data subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller. This would apply for example, if another entity was to take over the running of the Brookvale Village Hall

Object to processing: the right to object to the processing of personal data relying on the legitimate interests processing condition unless BCA can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject or for the establishment, exercise or defence of legal claims.

Special Category Personal Data

This includes the following personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person
- an individual's health
- a natural person's sex life or sexual orientation
- criminal convictions or offences

BCA may process special category data of customers and third parties as is necessary to provide services for the establishment, exercise or defence of legal claims.

BCA may process special category data of employees as is necessary to comply with employment law.

BCA has processes in place to ensure that it can facilitate any request made by an individual to exercise their rights under data protection law.

Anyone can make a data subject access request by emailing dataprotection@brookvale.co.uk Trustees, Staff & Volunteers when receiving such a request will send an email to dataprotection@brookvale.org.uk

For the purposes of Data Protection the Chair will act as the Data Protection Officer (DPO) and the Treasurer as Deputy Data Protection Officer (DDPO). Only the DPO and DDPO is authorised to fulfil data subject access requests.

All requests will be considered without undue delay and within one month of receipt as far as possible.

Privacy Policy (for customers & suppliers)

[This to be made available in the public area of the website, by email and / or hard copy as requested]

Our contact details

Name: Brookvale Community Association

Address: Brookvale Village Hall, Lower Brook Street, Basingstoke, RG21 7RP

Phone Number:

E-mail: dataprotection@brookvale.org.uk

The type of personal information we collect

We may collect and process the following information:

- Personal identifiers, contacts and characteristics such as:
 - Name
 - Postal Address
 - Email Address
 - Home and / or mobile telephone number
 - Bank details
 - Information about your interests and preferences
 - (For lone workers / suppliers only) information about medical conditions

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- When you join as a member or supporter or volunteer
- When you request information about any of the services we provide
- Entering into a contract for services you provide to us
- When you hire the hall
- When you want to find out about the annual programme of events such as the Thornycroft Day, Brookvale in Bloom competition and holiday events
- Recording an incident or accident

We also receive personal information indirectly, your bank account and sort code number, from your bank in the following scenarios:

- When you join the Brookvale Community Association Lottery and if you set up a direct debit
- When you provide us with a cheque as a breakage deposit
- When you pay for a hire by bank transfer
- When you make a claim for expenses
- When you make a donation

We use the information that you have given us in order to

- Send you information about the hall and / or the Brookvale Community Association
- Ask you for feedback specific to a service we have provided to you
- Ask for your input on events and services that you would like to see being provided
- Keep you informed on issues and events in the Borough that may have an impact, positive and negative on you
- Reserve the hall for your use
- Process payments for hall hire
- Process your lottery contribution
- Analyse survey responses, however these are always anonymised

We may share this information with relevant individuals and / or organisations.

Example 1: Where you ask about services provided by a third party we will share your details with that provider and vice versa so that you can make contact directly.

Example 2: When booking the hall you or we may enter details into the electronic booking system. This is provided by a third party Hall Master

Example 3: If you are a volunteer we may share your information with a third party in order to make contact so that you can discuss use of the hall or services being provided.

Example 4: Where you enter a competition, name and address may be made available to judges

Example 5: Where you have won a competition and we publish your details with or without a photograph

Lawful Basis

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting [dataprotection@brookvale.org.uk]

(b) We have a contractual obligation

(f) We have a legitimate interest

Please note that we will rely solely on your consent where we process data of persons under the age of 13

How we store your personal information

Your information is securely stored.

We keep & destroy the personal information per the table below.

Data	How Long
Bank Details	24 hours after processing refunds
Personal data given on hall hire application	13 months after date of hire
Contract	9 years (or longer in event of dispute)
Data for tax records	7 years after the tax year to which they relate

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at dataprotection@brookvale.org.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at

The Data Protection Officer

Brookvale Community Association

Brookvale Village Hall

Lower Brook Street

Basingstoke

RG21 7RP

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Privacy Policy (for trustees, paid people & volunteers)

[This to be made available in the public area of the website, by email and / or hard copy as requested]

Our contact details

Name: Brookvale Community Association

Address: Brookvale Village Hall, Lower Brook Street, Basingstoke, RG21 7RP

Phone Number: [Which]

E-mail: dataprotection@brookvale.org.uk

The type of personal information we collect

We may collect and process the following information:

- Personal identifiers, contacts and characteristics such as:
 - Name
 - Postal Address
 - Email Address
 - Home and / or mobile telephone number

- Date of birth
- Next of kin
- National Insurance Number
- Bank account details, payroll record, tax status information
- Pension and benefits information
- Copy of driving licence, passport, birth and marriage certificate, decree absolute
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Compensation history
- Performance and appraisal information.
- Disciplinary and grievance information.
- Secondary employment and volunteering information
- Information about your use of our information and communications systems.
- Photographs, videos.
- Accident book, first aid records, injury at work and third party accident information.
- Evidence of your right to work in the UK / immigration status

We will also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.
- Information about criminal convictions/allegations and offences

How we get the personal information and why we have it

We typically collect personal information about employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We will sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies, including:

- Her Majesty's Revenue and Customs HMRC
- Disclosure Barring Service (DBS) or prevailing standard
- Employee's doctors
- Medical and occupational health professional

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

Lawful Basis

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent
- (b) We have a contractual obligation
- (c) We have a legal obligation
- (f) We have a legitimate interest

We need all of the information that we have listed in order for us to perform our role as an employer, to enable us to carry our legal obligations or where it is necessary to do so in the public interest.

How we store your personal information

Your information is securely stored.

We keep the information shown below for the time period specified after which it is destroyed.

Data	How Long
Bank Details	24 hours
Work records	9 years
Tax records	7 years
Employment contract	6 years
Health data	9 years

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at dataprotection@brookvale.org.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [Insert your organisation's contact details for data protection queries].

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

IMPORTANT: Breaches of procedure or loss of data

Any breach should be reported to the DPO who will then appoint an appropriate independent person to investigate the matter. If, following a written summary of findings, a breach has been found to have occurred, appropriate action will be taken within 28 days. This may include consideration of pursuing disciplinary action or, in the case of a volunteer, asking the person to withdraw from BCA's service.

Guidance

BCA's trustees & volunteers should bear in mind the following considerations:

- Sensitive and confidential information must be treated with particular attention.
- Personal data must not be emailed to personal email accounts, as there is no guarantee of security of these accounts.
- Any personal data stored in paper format must be held securely locked in filing cupboards in BCA's office. If it has to be left in the office, consider pseudonymisation.
- All BCA personal computers must be password protected.
- Personal data must not be given out to any third party unless the individual has agreed to release this information.
- Any personal data kept in paper format that is no longer required must be destroyed.
- Any personal data kept electronically that is no longer required must be deleted. BCA will carry out data minimisation as part of the annual data audit.
- If data needs to be processed for profiling or for other statistical information, pseudonymise it. The procedures for this should be documented to ensure that the identification of the individuals is kept separate from the processed data.

Data Breach Policy

Who is covered by this procedure?

All staff, trustees and volunteers.

What is covered by this procedure?

This procedure covers how to deal with personal data breaches, from trustees, volunteers, associates and third parties, in terms of both the steps that need to be taken and tips for effective data breach handling.

The website of the Information Commissioner's Office (ICO) states a personal data breach can be broadly defined as:

'A security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed.'

Personal data breaches can include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission;
- loss of availability of personal data.

Policy

Under the UK General Data Protection Regulation (UK GDPR), there is a duty for BCA to report certain types of data protection breaches to the relevant supervisory authority. Breaches must be reported within 72 hours of becoming aware of the breach, where feasible.

This policy lays out the process that must be followed as soon as a data breach becomes apparent. Notification of a breach can come in many different ways, such as email, phone call or face to face. As soon as you are notified of a breach, please follow the process below.

All data breaches should be addressed to a trustee. Everyone should follow the process below.

Stage 1 – Notification of the breach

If you become aware of or suspect there is a risk to personal data, you must report this to a trustee immediately.

Stage 2 – Dealing with the breach

A breach will be investigated to:

- assess the risk to personal data;
- appoint, where required, an appropriate independent person to investigate the matter;
- decide on any immediate notifications that need to be made, such as those to the ICO.

Following the investigation:

- all actions made in the investigation are completed;
- a written report of findings and actions taken, along with the reasons why will be documented including whether the ICO has been notified (if not, the reasons why).

Stage 3 – Reporting breaches

As per the UK GDPR requirements, BCA will report a notifiable breach to the ICO without undue delay, but not later than 72 hours after becoming aware of it. If it takes longer than this, *BCA* must give reasons for the delay.

If, following a written summary of findings, a breach has occurred, appropriate action will be taken no later than 28 days following the written summary. This may include, in the case of a volunteer, asking the person to withdraw from *BCA*'s service; or in the case of third-party services, immediate termination of contract and legal investigation.

BCA will ensure it takes any actions in relation to a breach as quickly as possible to stop the breach and prevent any risk to any other personal data it holds. It will also make sure to notify those affected by a breach as soon as possible and support them with any actions that need to be taken.

Taking corrective actions

Changing your individual actions: if the problem has come about as a result of your individual actions, review your own processes and actions to avoid similar occurrences in future.

Changing a *BCA* process: if the problem has come about as result of general *BCA*'s ways of working, or another individual's actions, *BCA* will investigate this and introduce new systems, procedures and security measures as required.

Decision Making, Authorisation & Approvals Policy

Policy Objective

1. Relevant Decision

A decision made by the Trustees which impacts on:

- a. The way in which people benefit from BCA's purpose; and
- b. Who can benefit from it.

Example of such decisions might be:

- Provision of facilities and events;
- Use of Brookvale Village Hall (BVH);
- Engagement with third party subcontractors, employees, residents, volunteers, including Basingstoke Voluntary Action, Basingstoke and Dean Borough Council, BCA Commission, other educational institutions, grant making and support organisations as maybe necessary from time to time.

All Trustees have a duty to participate in the decision-making process (unless they have a conflict of interest). Trustees will always ensure that when making Relevant Decisions, they will:

- Check that the decision is furthering the purpose of BCA as laid out in the Constitution;
- Make sure that any private benefits to individuals or organisations are necessary, incidental and in the interests of BCA;
- Manage any risk of harm to beneficiaries and the public that might arise from BCA's work.

At all times Trustees will apply the principles of trustee decision making (the Principles), which are the principles that the courts have developed for reviewing decisions made by Trustees. Trustees must:

- Act within their powers;
- Act in good faith and only in the interests of BCA;
- Make sure they are sufficiently informed;
- Take account of all relevant factors;
- Ignore any irrelevant factors;
- Manage conflicts of interest;
- Make decisions that are within the range of decisions that a reasonable trustee body could make.

They must be able to show how they have followed these principles.

When making Relevant Decisions Trustees will have regard to the Commission's Public benefit guidance and "It's Your Decision: Charity Trustees and Decision Making" where relevant.

2. Operational Decision

A decision which affects the day to day running and maintenance of BCA and its assets.

This policy lays out the rules for and approach to authorisation and approvals of:

- Recruitment & remuneration;
- Financial expenditure;
- Banking matters;
- Contract matters;
- Hall hire matters;
- Exceptions.

This policy is designed to ensure that only sufficiently trained and competent members of BCA make operational decisions and commitments on behalf of it and that BCA is always in control of all operational decisions and commitments.

Roles & Responsibilities

The Trustees determines financial decision making and then delegates management of monies arising to the Treasurer, subject to approvals in the Authorisations and Approvals Matrices below.

The Trustees determines operational decisions with delegated delivery to identified Trustees Member(s), third party subcontractors and volunteers. On a day to day basis the Operational Maintenance Manager (OMM) will take decisions as delegated, noting reasons for and appraising the Trustees via email and / or at the monthly management meeting.

The Trustees is responsible for the maintenance of this policy.

All members of BCA must comply with this policy.

There are no exceptions to this policy.

Scrutiny & Oversight

The Trustees meets monthly.

The Trustees scrutinises all decisions, income, expenditure, incidents & complaints, bad debt and other factors, including hiring agent and letting in / letting out (LILLO) stress to determine the effectiveness of this policy and compliance with it.

Approach

Relevant Decisions can only be made following the Principles laid out in this policy and compatible with the Constitution. Relevant Decisions will be formally recorded as a minute at the meeting in which the decision was made or ratified and showing how the Principles have been followed.

Relevant Decisions concerning commitments include, but are not limited to:

- Use of Charity funds including charitable disbursements;
- Raising funds through donations, grants, membership, income bearing assets, and financial instruments.

Operational Decisions must be accompanied by a full audit trail for all commitments, which can be via email, over the telephone, a file note, a letter, all carrying the date and time / timescale of the commitment.

Operational Decisions concerning commitments include, but are not limited to:

- Agreeing more “bespoke” terms with customers or users clients e.g. concession costs of hall hire;
- Making an order to a supplier, including IT, Telecoms, Insurance, Banking;

- Writing off a debt;
- Approving an employee expense;
- Offering an employment contract;
- Amending employee terms;
- Entering into contract terms with any subcontractor, supplier, customer or user.

Procurement, purchase, expenditure decision levels, and individuals able to approve exceptions are detailed in the Authorisations and Approvals Matrices.

Banking

The Treasurer manages the relationship with banking counterparties including any day to day matters and general issue resolution.

New bank accounts or capital spends may only be authorised by the Trustees.

Trustees authorises each new capital spend via three Trustees signatories per the banking mandate list below.

Trustees Member(s) charged with a one-off purchase, have discretionary pre-agreed spend authorised up to £100 with the Treasurer on sundries, when submitted to the Treasurer as expense claims, subject to Chair approval.

Chair approves non-capital, non-maintenance & non-revenue spend on Employees & Subcontractors hours only.

Authorised Signatories

Bank Name: Lloyds – Cheque

Charity Roles / Spend	Limit	Signatories	Authorisation & Approval
Treasurer / discretionary / non-capital	£1,500	Two out of three on banking mandate	Chair
Treasurer / discretionary / maintenance	£500	Two out of three on banking mandate	Chair
Trustees / agreed capital projects	£ Unlimited	Two out of three on banking mandate	Chair

Bank Name: Lloyds – E-transfers

Charity Roles / Spend	Limit	Signatories	Authorisation & Approval
Treasurer / discretionary / non-capital	£1,500	One	Chair
Trustees / discretionary / maintenance	£500	One	Chair
Trustees / agreed capital projects	£ Unlimited	Three	Chair

Trustees / discretionary	£ 100	One	Treasurer
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Bank Name: Lloyds – Bonds

Charity Roles / Spend	Limit	Signatories	Authorisation / Approval
Trustees / agreed transaction	£ Unlimited	Three	Chair

Insurance

Insurance is under a 3 year Level Term Assurance (LTA). Renewal price and any changes in terms are shared to the Trustees to discuss & agree

Hall Hire

The published rates are considered by the Trustees in March each year, to apply from 1st May financial year. The current rates will be displayed on the Brookvale Community Association website.

The following factors are used to determine appropriate rate:

Community Hire Rate: These rates are available to charities and not for profit ‘benefit to the community’ organisations or events, children’s parties (aged 1 to 12), private functions and personal hire ¹.

Commercial Hire Rate: These rates are available for business users. Regular business users ² who hire the hall for a minimum of 8 or more bookings in one year are eligible for a 10% discount. This rate also applies to local authorities.

Youth Group Hire Rate: Pre-school groups / parent and toddler groups / after school clubs / uniformed youth groups / youth groups except where a business use is identified.

From time to time there may be a decision needed on which is applicable for example, a “commercial” exercise class holding a “community” charity fund raising event. The Treasurer decides on a case-by-case basis and records the reason for the decision.

A security / cleaning deposit is paid by each hire and refunded within 7 days of the event.

Any decision for free “community” use is shared with the Trustees.

Cancellation charges are as specified in the Booking Terms & Conditions and may be waived.

¹ **Private Functions & Personal Hire** - a private function is defined as an event organised by an individual or a group where entry is by invitation only.

² **Business Users** - a business user is defined as a limited company / a partnership / a sole trader / a franchisee / friendly society / national & international charity / local authority and or Government Department, Agency and Public Body.

Third Party Remuneration

The Trustees agrees new members, approves and authorises all contracts with any category of employee / agreements and remuneration, including 3rd party subcontract suppliers, employees, volunteers external organisations to proceed.

Purchases & Procurement

All commitments need to be approved by the Trustees and evidenced in the form of:

- Contracts;
- Deeds;
- Supplier Agreements;
- Non-Disclosure Agreements;
- Building maintenance and repair arrangements.

Projects and their budgets are discussed and agreed by the Trustees. If the work is satisfactory and the budget not exceeded etc invoices are paid by the Treasurer by due date

Quotes for one-off work for example, lift repair, discussed by Chair, Treasurer and Operational Maintenance Manager

Any capital / maintenance expenditure request must be accompanied by a simple statement on how the expenditure supports BCA's objects & activities.

General Recurring Costs

Cleaning, maintenance and Treasurer's costs (parts, stationery, refreshments etc) are signed off by the Chair.

Recurring suppliers – gas inspection, fire extinguisher maintenance, internet, Blurb printing, gardening, handyman etc are paid by the Treasurer by due date. Normally below £250 per invoice.

Power & water are paid by Direct Debit Mandate. Renewal quotes are shared to the Trustees to discuss & agree.

The Treasurer, acting jointly or severally, approves invoices against capital / maintenance expenditure requests, all payments being paid within term.

All details of payments and receipts are shared to the Trustees every month.

Bank & Supplier Authorisations & Approvals Matrix

Who?	Open Bank A/C	Bank Mandate	Contract Terms	Goodwill Gestures	Insurance Policy	Agree Funding (grants, loans)
Trustees	Yes	£ Unlimited	Yes	£ Unlimited	Yes	Yes
Chair	No	No	No	No	No	No
Treasurer	Yes (jointly)	Yes (jointly)	No	No	No	No

Internal Authorisations & Approvals Matrix

Who?	Expenses	Capital Expenditure	Disposal of Fixed Assets	Any Policy Exception (not detailed in policy)
Trustees	£ unlimited Authorisation	£ unlimited Authorisation	£ unlimited Authorisation	Yes
Chair	Yes / Approval	No	No	No
Treasurer	No	No	No	No
Op. Maintenance Manager	No	No	Yes Approval	No

Disaster Recovery Plan

This plan outlines the detailed accountabilities and actions needed should disaster strike Brookvale Village Hall (BVH) or activities. It outlines BCA's response to an **extreme situation** and details of its emergency procedures in order to:

- minimise risks to persons;
- limit the impact of an incident on BCA's regular operations;
- help restore any interrupted services as soon as possible;
- clarify roles and responsibilities in the event of a disaster.

An **extreme situation** is defined as the loss of BVH or inability to carry out activities as a result of a natural or human-made disaster (fire, flood, terrorism, etc.).

Other extreme situations that could affect BCA could include, for example:

- Loss of persons due to
 - flu pandemic where 40% or more of staff are affected
 - severe and ongoing adverse weather conditions
 - fuel crisis
 - civil unrest
 - transport crisis
- Loss of basic supplies like electricity or water
- IT issues (loss of communication connections, problems with broadband provider, etc.)

In the event of any of the above situations, BCA may need to deploy part or all of the Disaster Recovery Plan.

The process

In the event of an extreme situation, the following steps should be followed:

1. Notify a senior manager.

Contact the Trustee with operational responsibility, who will set up the Disaster Recovery Team.

- Determine the degree of disaster (for example, who is affected and how? How long might a resolution take? What is the potential impact of the disaster? What immediate measures could be taken to reduce the impact?)
- Implement recovery plan dependent on the extent of the disaster.

Name	Home phone number	Mobile phone number
Ted Blackmore-Squires	01256 324313	07554517587

Each member of DRT will then contact trustees, volunteers and hirers.

The Disaster Recovery Team

Accountabilities for activities following a major disaster are as follows:

- organise an emergency meeting of the DRT to take place within the first 24 hours in a suitable location;
- keep the business coming in (sales, marketing, etc.);

- identify short- and longer-term alternative premises and other relevant space (in accordance with BCA's insurance policy) if required;
- organise phone and email diverts and messages;
- liaise with insurers;
- liaise with landlords;
- boost morale.

Cathy Williams

- contact *customers* in the first 48 hours;
- divert *customers* away from building in the first 48 hours (if BVH is unavailable);
- arrange location and booking of alternative *[event/service]* venues for first month if applicable;
- contact *[associates/clients]* regarding new venues;
- recover materials required to alternative venue.

Cathy Williams or Malcolm McKinnes

- update BCA's social media channels with the immediate status;
- manage a communications plan – co-ordinated messaging usable across all teams and externally.

Ted Blackmore-Squires or Cathy Williams

- purchase replacement equipment in accordance with insurance policy and consultation with the finance team.

IT recovery and back-up arrangements

Each Trustee keeps key information on their own home computers thus providing natural diversity in the case of loss.

Contact details of external stakeholders

In most circumstances, the staff named in this Disaster Recovery Plan will have the responsibility of contacting external stakeholders if required. If the named staff member is not reachable, contact and other relevant details for external stakeholders who might need to be contacted are listed below:

Environmental Policy

Who is covered by this policy?

All staff, trustees, volunteers and associates.

What is covered by this policy?

This policy outlines how *BCA* aims to ensure that environmental impact is taken into account in all its activities.

Purpose

BCA believes that it is possible to provide a high-quality service in a manner that ensures a safe and healthy workplace for its staff and minimises its potential impact on the environment. BCA aims to operate in compliance with all relevant environmental legislation and strives to follow pollution prevention and environment-friendly practices in all it does.

The Policy

BCA will:

- integrate the consideration of environmental concerns and impacts into all of its decision-making and activities;
- promote environmental awareness among BCA's staff, trustees and volunteers and encourage them to work in an environmentally responsible manner by providing appropriate information and training on environmental issues and practices that may affect their work;
- in the first instance, reduce usage of resources and waste, and commit to re-using and recycling (and to purchasing recycled, recyclable or re-furnished) products and materials, where these alternatives are available, economical and suitable;
- promote the efficient use of materials and resources throughout its facilities including water, electricity, paper and raw materials, particularly those that are non-renewable;
- avoid the unnecessary use of hazardous materials and products, and seek substitutions when feasible;
- when hazardous materials must be used, stored or disposed of, take all reasonable steps to protect human health and the environment;
- purchase and use environmentally responsible products;
- where required by legislation or where significant health, safety or environmental hazards exist, develop and maintain appropriate emergency and spill-response programmes;
- be open about BCA's environmental commitments with its colleagues, beneficiaries, customers and the general public and encourage them to support these commitments;
- continually improve its environmental performance and minimise the potential negative impact of its operations by periodically reviewing this environmental policy in light of BCA's current and planned future activities.

Equality, Equity, Diversity and Inclusion Policy

Who is covered by this policy?

All staff, trustees and volunteers, job applicants, beneficiaries, *[associates]*, subcontractors and anyone else who comes into contact with BCA.

What is covered by this policy?

This policy sets out BCA's commitment to ensuring that anyone who comes into contact with it is treated with warmth, dignity and respect irrespective of who they are and what protected characteristics they may have.

This policy also outlines the proactive work BCA does to ensure it is an anti-racist and anti-discriminatory organisation and to promote a positive working culture for everyone.

Purpose

The purpose of this policy is to ensure that all individuals who come into contact with *BCA* are treated fairly and equally and that *BCA* provides a space free from all forms of harassment, bullying and discrimination.

BCA will ensure that it is aware of situations where the organisation and individuals may exhibit bias and prejudice – both conscious and unconscious – and take steps to prevent and rectify this.

Trustees, staff and volunteers will be engaged in the development and implementation of this policy to ensure that equality, equity, diversity and inclusion (EEDI) are promoted through *BCA*'s work internally and externally.

Key success criteria

This policy will be deemed successful if:

- There is a positive culture throughout *BCA*, where diversity, inclusion, compassion and respect are core values and at the centre of all its activities.
- *BCA* eliminates all forms of conscious and unconscious discrimination in its practices and behaviours.
- *BCA* actively encourages positive action to overcome disadvantage and discrimination.
- *BCA* ensures the highest possible standards are achieved in the delivery of its services to beneficiaries and in its employment practices.
- *BCA* ensures EEDI are promoted through its work, both internally and externally.
- Everyone feels valued and given space to work to their full potential.

The policy

What staff, trustees and volunteers must do

- *BCA* asks all its people to demonstrate their commitment to this policy adhere to it.
- *BCA* expects every employee, volunteer and trustee to assist *BCA* in meeting its commitments to provide equality of opportunity and a culture free from discrimination.

- Everyone should know BCA's standards of behaviour, actively implement its values and be an exemplar of equality and fairness in everything BCA does.
- BCA encourages everyone to communicate the terminology that describes them, and others should respect and use that terminology (e.g. by using preferred pronouns – she/her, he/him, they/them and so on).
- Everyone should uphold the values of this policy when representing BCA, for example at external events and on social media accounts.
- Any breaches of this policy (including but not limited to acts of discrimination, harassment, bullying or victimisation) will be regarded as misconduct and will be subject to BCA's Disciplinary and Dismissal Procedure.

What BCA will do

- BCA will provide training to all about this policy and BCA's commitment to being an inclusive, non-discriminatory organisation. Attendance at training sessions will be compulsory to those who are notified that they should attend.
- Training, and suggested reading, will be included as a part of induction process for new employees and new trustees.
- All staff will be expected to read articles and books sent to them, as is usual at BCA. Time can be taken out of the working day to read around the topics suggested.

Recruitment

- BCA will not discriminate in the selection of staff for recruitment or promotion. See Recruitment and Selection Policy.
- BCA may use suitable lawful methods (including, where appropriate, positive action) to attract candidates of any identified under-represented group in particular types and levels of vacancy.
- BCA will identify institutional barriers to the attraction, retention and progression that may face those with protected characteristics before advertising any roles externally. This means that BCA will run job descriptions, person specifications, adverts and so on past a number of people / organisations, such as Basingstoke Voluntary Action, to ensure it is not being unconsciously discriminatory.

The technical bits

Definitions

This policy refers to equality, equity, diversity and inclusion (EEDI). A definition of each of these words can be found below to help staff understand what *BCA* means by these terms.

- **Equality** in the workplace means equal job opportunities and fairness for employees and job applicants. This means equal opportunities to join project groups, access to training, development, involvement in consultations, opportunities to act in absence and so on.
- **Equity** refers to providing various levels of support and assistance, depending on specific needs or abilities, in order to achieve real equality.
- **Diversity** is the range of people at BCA. For example, this might mean people of different ages, religions and ethnicities, people with disabilities and people of specific gender or with no gender identity. It also means valuing those differences such as people's background, education, where they are from, what languages they speak, their accent and their personal experiences.
- **Inclusion** in the workplace means everyone feels valued at work. It lets all employees feel safe to come up with different ideas, raise issues and express their views. BCA encourages staff to do things in

different ways. BCA will take into account your personal circumstances, beliefs and values along with any conditions that need to be accounted for to make you feel included and welcome.

What is meant by ‘protected characteristics’?

The term ‘protected characteristics’ used in this policy refers to those outlined in the Equality Act 2010, namely: race, sex, marital or civil partnership status, maternity and pregnancy, age, disability, sexual orientation, gender reassignment and religion or belief. Although not within the Equality Act 2010, BCA also considers socio-economic status and health conditions that are not currently captured by the act to hold the same considerations within this policy.

BCA is committed to going beyond the legal minimum regarding EEDI and strives to be an example of best practice.

Current equality legislation and associated codes of practice have been taken into account within this policy.

What type of bias are we talking about?

BCA wants to ensure that it is overcoming the normative nature of its worldview (which means a view that is widely held and rarely questioned) by avoiding being an organisation that is unconsciously and unintentionally ethnocentric (which means you evaluate other cultures according to the standards and customs of your own culture), androcentric (which means you are focused on men and centred around their needs above others), heteronormative (which means your worldview promotes being heterosexual as the preferred sexuality) and ableist (which means you discriminate people with disabilities based on the belief that those without disabilities are somehow superior).

This means that BCA doesn’t want to do anything that may negatively impact people of particular ethnicity, those with disabilities, individuals of a certain gender or sexuality, those from a specific socio-economic or educational background, those for whom English is their second language and so on. BCA will ensure that it actively seeks to employ people from a range of backgrounds and experiences, that working groups and project teams are a mix of departments and people and that it is as diverse and representative of the people it serves as it can possibly be.

External Complaints Procedure

Who is covered by this procedure?

All beneficiaries, associates and third parties using BCA's products and services.

What is covered by this procedure?

This procedure covers how to deal with complaints from customers, associates and third parties and explains what steps need to be taken to ensure effective complaint handling.

Purpose

The purpose of this policy is to ensure that no person coming into contact with BCA ever feels that they have not had an excellent experience or that their feedback or complaint has not been taken seriously and dealt with empathetically and efficiently.

Feedback from customers, associates and third parties and how we deal with it is invaluable in helping us to continuously improve. Negative feedback and complaints are particularly helpful in pinpointing what we need to do better, and if we deal with complaints effectively, we can often improve our relationships with customers and associates overall.

The procedure

Complaints may be received by any member of staff, volunteer or trustee and may arrive in many different forms, for example: by letter or email; by comments on a feedback form; in person from a delegate, speaker, trainer or customer; by phone; or via social media.

However the complaint reaches BCA, the following procedure should be followed:

Stage 1 Record the complaint

Complete Parts 1 and 2 of the BCA Complaint Form (see below) and email it to complaints@bca.org Use the name of the complainant and date as the file name. Refer all complainants to the complaints procedure on www.bca.org

Stage 2 Dealing with the complaint

The recipient will attempt to resolve the complaint in the first instance and complete Part 3 of the BCA Complaint Form.

Stage 3 Reporting complaints

The recipient will follow up with the complainant to make sure they are happy with the resolution.

Stage 4 Closing the complaint

If the complainant is happy with the resolution, the complaint will be closed and filed. If the complaint is not resolved, the matter will be discussed at the next management meeting (or at an extraordinary meeting if more urgent) to find an alternative resolution.

Timescale

Under regular circumstances, the complaint process should be completed within five working days. If the complaint is complex and cannot be dealt with within this timescale, the complainant should be updated regularly with progression on their complaint.

BCA Complaint Form

This form is to be completed for all complaints received by whatever means (including in writing, by email, in person or by phone). Please attach copies of any written correspondence to this form when complete and send it to the [role].

Part 1: Complainant details:

Name:

Job title:

Organisation:

Phone number:

Address:

Email address:

Complaint received by:

Date received:

Received via:

Part 2: Details of problem:

Please provide full details of the nature of the problem (ensure you include all facts clearly)

Part 3: Details of problem resolution:

Please detail how we plan to resolve the issue with the customer:

Completed by (name):

Dates completed:

Fire Procedure

Who is covered by this procedure?

All staff, delegates, trustees, volunteers and associates.

What is covered by this procedure?

Details of what to do in the event of a fire in the Brookvale Village Hall.

Purpose

BCA has the responsibility to make sure all staff, volunteers and visitors to its buildings have knowledge of its fire procedure.

The procedure

Trustees & Volunteers

All events are accompanied by a Risk Assessment which takes into account fire safety considerations. Everyone will be shown where the fire exits are as part of their induction and will be provided with a copy of this procedure.

Hirers

All hirers are provided with an information email which gives brief details of the procedure to follow in the event of a fire including details of assembly points. The Let-in Let-out (LiLo) co-ordinator will show the hirer around the building pointing out fire escapes and assembly points.

People attending BCA events

Attendees are briefed at the start of events on the fire procedure, fire exits and assembly points.

In the event of a fire:

- If you discover a fire, set off the fire alarm by the break boxes which are located at all external exit doors and dial 999 to inform the fire brigade.
- Do not attempt to put out the fire unless it is obstructing your exit from the building.
- When you hear the siren, evacuate the building immediately by your nearest fire exit, leaving in a calm and orderly fashion. Do not stop to collect belongings.
- Proceed to the fire assembly point, which is in the car park
- In the event of a fire, *do not* use the lifts.
- No one may re-enter the building until the fire brigade have said it is safe to do so.

Grievance Procedure

Who is covered by this procedure?

All BCA trustees, staff & volunteers.

What is covered in this procedure?

This procedure covers what to do to settle grievances that may occur at work.

Purpose

The purpose of this policy is to ensure that BCA volunteers know how to settle all grievances concerning other staff, their own work, the organisation or other matters relating to their employment. This policy aims to fairly, simply and quickly settle any grievance (see also Bullying and Harassment Policy).

The procedure

A grievance is any concern, problem or complaint that a volunteer has in relation to their work with BCA. Where possible, volunteers should try to settle any issues informally with the person concerned or raise it with a Trustee at the earliest opportunity. Where any issue is not possible to resolve informally, the Grievance Procedure should be followed.

Unless there is a good reason for not doing so, volunteers should raise a grievance matter as soon as possible and no later than two weeks after the incident to which it refers.

All grievance proceedings and records will be held confidentially (although BCA's trustees have a right to be informed of any such proceedings and view the associated documents).

Raising a grievance

A volunteer should raise the matter formally and without unreasonable delay. This should be done in writing (see the Grievance Form below) and should set out the nature of the grievance. While BCA understands that grievances are normally accompanied by strong emotions, the person submitting the complaint should not use insulting or abusive language and should focus on the facts of what happened.

Upon receipt of the grievance, a Trustee will organise a formal meeting without unreasonable delay, usually within five working days (or as soon as is practicable). All those involved must take all reasonable steps to attend the meeting.

The volunteer may be accompanied by a friend or family member to act as a support and who should not speak on behalf of the volunteer. If the volunteer is to be accompanied they should inform the trustee in advance of the meeting.

Grievance meeting

At the grievance meeting, the volunteer will have a chance to explain their grievance and how they think it could be resolved. If further investigation is necessary, BCA reserves the right to adjourn the grievance meeting in order to conduct any such investigation. This, in effect, means that the grievance is paused at this stage.

Following the meeting, the Trustee will decide what action, if any, to take and communicate the decision to the volunteer in writing without unreasonable delay, in usual circumstances within two weeks of the meeting.

Where appropriate, the decision will set out what actions have been agreed and who is responsible for taking them in order to resolve the grievance.

If it is necessary to gather further information before making a decision, the Trustee will inform the volunteer of this and the likely timescale involved.

The volunteer has a right to appeal if they are not content with the decision and/or action taken.

Appeal

The volunteer should inform the Trustee in writing of their grounds for appeal within seven working days of the decision being communicated to them in writing.

An appeal panel of a selection of Trustees, will be convened. It will be chaired by one who has not been involved in the case to ensure impartiality.

The volunteer may be accompanied by a friend or family member to act as a support and who should not speak on behalf of the volunteer. If the volunteer is to be accompanied they should inform the trustee in advance of the meeting.

Appeals will be heard without undue delay, normally within two weeks of being received, and at a time and place which will be notified to the volunteer in advance. The volunteer should take all reasonable steps to attend the meeting.

The outcome of the appeal will be communicated to the volunteer in writing within two working days after the appeal hearing.

Grievance Form

Name volunteer:

Details of complaint

It will help the process if you provide as much information as possible. Please consider the following and provide any relevant detail:

- Date, time and location of the incident(s):
- The name [and job title] of the person you are complaining about:
- Names of any witnesses to the incident(s) and why you consider them to be relevant to your complaint:
- Behaviour the person you are complaining against demonstrated (e.g. language, tone, body language):
- How this behaviour made you feel:
- Why you think the person behaved in this way:
- Examples of similar behaviour by this person either towards you or another person:

Have you tried to address your concerns with the person you are complaining about? Please provide details of any steps you have taken to try to resolve your complaint informally. If you have been unable to talk to this person about your concerns, please explain why.

If you have any other information or documentary evidence that you believe supports your complaint, please include such detail with your complaint.

Health and Safety Policy

Who is covered by this policy?

All staff, trustees, volunteers, beneficiaries and customers of BCA.

What is covered in this policy?

BCA wants to protect all its people and stakeholders from risks of occupational injury or ill health.

This policy covers:

- BCA's health and safety policy statement;
- roles and responsibilities for health and safety;
- hazards, risks, incident reporting and training;
- BCA's working environment procedures.

BCA's health and safety policy applies to the following specific areas:

- the physical and virtual office environment;
- fire policy and fire safety management;
- first aid;
- work station assessment;
- workloads and overtime;
- eye health and testing;
- encouraging rest breaks while working;
- manual handling rules;
- portable appliances testing;
- electrical equipment safety;
- risk assessment;
- accidents and accident book;
- consultation with staff;
- maintenance of equipment and machinery;
- information, instruction, supervision and training of staff.

The policy

BCA is committed to ensuring that health and safety at work is paramount and encompasses anyone who may be affected by its activities. Adequate resources will be provided to ensure all stakeholders are aware of this policy and committed to its effective implementation.

BCA will comply with the requirements of health and safety legislation.

All BCA's trustees, volunteers, beneficiaries and customers should have an awareness and understanding of health and safety hazards and risks that affect BCA's operations.

Communication and consultation

BCA will have active and open communication and consultation. Health and safety will be integrated into its communications, wherever appropriate.

Roles and responsibilities for health and safety will be defined, as necessary, within job descriptions or profiles.

Management roles and responsibilities

Trustees will ensure that:

- they demonstrate leadership in health and safety;
- they undertake tours ('walk the job') to ensure that health and safety issues are identified, assessed and managed;
- systems are in place and staff are empowered to raise health and safety concerns with management;
- adequate resources are provided for health and safety.

Hazard identification

BCA will identify workplace health and safety hazards and will inform stakeholders, as appropriate, of these.

Risk assessment and management

BCA will assess the risks associated with health and safety hazards in the workplace and will inform all stakeholders of the health and safety risks that affect their work. BCA will take action to prevent, reduce or control risks to an acceptable level and reduce the potential for incidents and accidents. It will require its subcontractors and stakeholders to identify health and safety risks that may impact on its work activities.

Health and safety training

All BCA's trustees and volunteers will be adequately trained on the health and safety issues that affect them and the safe working practices that should be followed. BCA will ensure the health and safety competence of its stakeholders.

Incident investigation

BCA will report and investigate accidents, incidents and near misses to drive improvement in its health and safety management. Any lessons learned from such events will be used to take corrective action to prevent recurrences.

Health and safety management system

BCA will implement management systems to ensure that it:

- complies with health and safety legislation;
- fulfils the requirements of BS8800 and OHSAS18001;
- continually improves our health and safety performance.

Delivering BCA's policy

BCA's policy will be delivered by generating a culture that does not tolerate threats to health and safety and ensuring the involvement of all BCA's stakeholders.

Policy review

This policy will be reviewed and amended frequently, to make sure it is always in line with the latest developments in health and safety laws and regulations.

Health and safety and working environment procedures

Brookvale Village Hall

When using the BVH, all are responsible for keeping it clean and tidy – washing their cutlery and dishes, tidying up after using them and so on ensuring all rooms and corridors are clean and clear of clutter.

Smoking policy

BCA operates a strict no-smoking policy anywhere inside its buildings. Smoking is not encouraged but permitted in designated smoking areas outside the building, provided it does not negatively affect visitors or other residents.

Building security

Please see the LiLo Instructions.

All LiLo should note:

- It is prohibited to lend keys to unauthorised persons.
- All LiLo / hirers leaving BCA should return their key.
- It is the responsibility of the person or people leaving the premises to ensure no visitors are left inside, lights are turned off and the entrances are securely locked.

Control of Hazardous to Health Review

Assessment

The assessment must be a systematic review including but not limited to:

- What substances are present? In what form
- What harmful effects are possible?
- Where and how are the substances actually used or handled?
- What harmful effects are possible?
- Where and how are the substances actually used or handled?
- What harmful effects are given off etc?
- Who could be affected, to what extent, for how long?
- Under what circumstances?
- How likely is this to happen?
- What precautions need to be taken to comply with the COSHH Regulations?

Prevention or Control

We must ensure that the exposure to hazardous substances is prevented or if this is not reasonably practicable, adequately controlled.

We may prevent exposure by;

- Removing the hazardous substance by changing the process
- Substituting with a safe or safer substance or using a safer form

Or where this is not reasonably practical, controlling exposure by:

- General ventilation

- Using safe systems or work and handling procedures.

We must provide suitable and sufficient information, instructions and training so that all working for and on behalf of BCA know the risks they run and the precautions they must take.

We must make sure that anyone who carries out any task in connection with their duties under COSHH has sufficient information, instruction and training to do the job properly.

BCA's policy statement on health, safety and the environment in BCA by the Trustees

We expect all BCA's volunteers and hirers to ensure that the management and practice of health, safety and environmental matters are afforded the highest importance. The promotion of health, safety and environmental protection measures for workplaces, goods and services is everyone's responsibility. In addition to complying with the Health and Safety at Work etc. Act 1974, it is BCA's policy that everyone:

- observe the provisions of all health, safety and environmental legislation;
- operate in an environmentally responsible manner;
- have a duty of care to ensure their own health, safety and welfare as well as that of their colleagues, contractors and visitors;
- ensure people not directly employed within BCA but who visit, work in or are in the close proximity of BCA buildings are not placed at unreasonable risk;
- take all reasonable steps to protect the health, safety and welfare of themselves and others;
- are trained within their area of responsibility to ensure that risk against the health and safety at work of all staff is minimised;
- ensure that all equipment and machinery is maintained so that it is safe to operate without risk to health and safety;
- maintain a constant and positive interest in health, safety and environmental matters.

Policies for equipment maintenance and inspection and work practices and procedures are to ensure, as far as reasonably practicable, the safety of the user, maintainer and others.

Internet, Email and Social Media Safety Policy

Who is covered by this policy?

All trustees, volunteers, and sub-contractors while acting for BCA.

What is covered by this policy?

This policy clarifies what is and is not acceptable behaviour with regard to internet, emails and any forms of social media.

Purpose

The purpose of this policy is to protect BCA, volunteers, trustees and sub-contractors from abuse, honest mistakes and harm, and the subsequent consequences of these things.

Context

The internet is considered a form of publication, which means that both words and pictures posted on the internet can be judged libellous and BCA may find itself liable for the action of anyone acting for and on behalf of it.

The internet is legally considered a public place, and as such it is an offence to publish or distribute obscene material; this includes pornographic material and material likely to cause personal offence.

The policy

BCA stakeholders must remember that all internet activity can be logged by their device, BCA's internet server, BCA's Internet Service Provider (ISP) and by the ISPs of any sites visited. This information is legally available to the police (among others) and will be traceable back to BCA. Similarly, all email can be traced, intercepted and recorded by third parties. Email should be treated like a postcard: it is not a private or secure means of communication. You are expected to keep your device and all software updated and not compromise the safety of other network users. Paid persons may have a device supplied by BCA in accordance with their individual agreement terms & conditions

Use of the internet

- No-one is permitted to knowingly distribute or access any material which discriminates or encourages discrimination or harassment on the grounds of race or ethnicity, sexual orientation, marital status, age, nationality, religion, disability or any other characteristic protected by the Equality Act 2010. To do so may lead to disciplinary action.
- As required by the General Data Protection Regulation 2018 (GDPR) no-one must disclose or transmit personal data other than your own unless in accordance with BCA's Data Protection Policy.
- No-one is permitted to access illegal, obscene or offensive material on the internet using BCA's equipment while in a professional capacity or otherwise representing BCA.
- If you find that you have accessed such material unintentionally, you must leave the website immediately. You should also inform a trustee as soon as possible to ensure that such accidental access has not put the organisation's IT security at risk.

- Under usual circumstances, the internet should be used for reference only. If necessary, downloading files/software should only be done in line with BCA's IT Security Policy.
- You are welcome to "Bring Your own Device" and connect to the BCA Wi-Fi. Volunteers, trustees and sub-contractors must not permanently store BCA's files or material on their desktops. Where it is necessary to do so, files must only ever be saved on the desktop temporarily and deleted once the work is complete.
- You must not publish or distribute any obscene, offensive or defamatory messages online, via email or on any form of social media.

Use of email

- Within reason, personal emails are permitted on BCA devices but should be kept to a minimum. Remember that personal emails, if within BCA's system, are no longer private and can be accessed by BCA and/or its sub-contractors where appropriate. Unencrypted emails can be "sniffed" for content.
- Committee members who communicate with the public are entitled to have an email "alias" created: name@brookvale.org.uk.
- Suspicious emails should either be immediately deleted or forwarded to the Trustees for investigation.

Use of social media

- Any use of social media by a member of BCA which associates them formally with BCA must comply with the guidelines for the use of the internet above. Everyone is responsible for their own content/posts/moderation and groups which should not damage the BCA's reputation.
- A social media account formally associated with BCA must be granted with permission from a trustee and must comply with BCA's guidelines. Any such social media accounts will be accessible to BCA. Formal association with BCA includes, for example, using a handle such as @[NameSurnameBCA] or mentioning your association in your social media details.
- You should note that if any of your personal social media accounts put the brand and reputation of BCA or any associates at risk, you may be asked to formally dis-associate yourself from BCA
- BCA does not permit anyone to discuss BCA's business, colleagues or associates on social media without express permission.

Any breaches of the policy may result in investigation and possibly external reporting to law enforcement.

This policy is not a definitive statement. BCA expects you to exercise good judgement, and to at all times conduct yourself in a manner that will not cause harm to BCA or its stakeholders and in accordance with the spirit of this policy statement.

Use of backups

- When using your own devices with BCA publicly available data, you will need temporary backups to overcome potential data loss. According to the intensity of your work, you should backup your data regularly to unencrypted manual archive storage held securely offsite.
- Be aware that automatically synced/backed-up data retains the latest file copy among multiple devices and that your BCA colleagues maybe able to supply you with the earlier file version.
- When using your own device be careful to separate into folders and partitions your own personal/financial data from BCA public/private/financial/business data. If using encrypted devices/storage/data these need additional consideration around work file sharing and data recovery

IT Security Policy

Who is covered by this policy?

All people at BCA who use their personal/BCA's IT equipment, platforms and software and access BCA's data.

What is covered by this policy?

This policy clarifies for staff and volunteers what they need to do to keep BCA's IT equipment secure and protected from viruses and malicious attacks, whether they are working at home or onsite. This policy covers: laptops, desktop computers, tablets, mobile phones and smartphones if being used for work at BCA.

Purpose

The purpose of this policy is to keep BCA people and customers safe from malicious cyberattacks, viruses and potential data loss.

The security of equipment used online is essential to reduce the risk of problems with IT, to protect BCA, customer and confidential data and business-critical information (and adhere to GDPR rules).

Over the last several years cyberattacks on businesses and charities have increased, and BCA must ensure it has robust systems in place to protect its data online and offline. We all have a responsibility to be alert to security risks and report anything that we are concerned about.

The policy

If you access BCA's data, platforms or applications on your phones and/or other devices, then you must ensure that there is adequate and up-to-date anti-virus software installed and that a passcode or password is required to access the device (to protect the device in the event of loss or theft).

BCA's anti-virus software [name] must be installed and kept up to date on all BCA's devices. When new devices are set up, ensure that this has been properly installed by an IT services provider. If in doubt about whether it is installed on your BCA's device, raise it with an IT services lead or your designated BCA reporting person.

BCA's data should be password restricted and may prompt multi-factor authentication when working on multiple devices.

BCA recommend you switch off all devices at the end of the working day to help ensure the anti-virus software is regularly updated at next start-up.

You should not use the device to perpetually store BCA's work on your desktop – Released documents should normally be stored within the BCA's website.

Wireless Access (Wi-Fi)

The Device name and password is displayed within the Village Hall building.

Be aware that when using this "public" Wi-Fi it is not as secure as a router cable connection and do not pass sensitive financial data over this type of connection.

Guidelines on how to protect your devices

It is everyone's responsibility to ensure that the IT at BCA is secure. People are required to follow these practical guidelines:

- Remove software that you do not use or need (which may require admin authorisation).
- Update your operating system and applications regularly when prompted to (this should be activated when shutting down your system).
- Store files in regular backups to be made available to all in an emergency.
- Understand the privacy and security settings on your devices and internet accounts.
- Shared devices are not recommended and must have separate user accounts for other people.
- Require administration authorisation to install applications and software.
- Do not use an administrator account on your computer for everyday use.
- Ensure that all your devices log out automatically after being inactive for 15 minutes and require a password/passcode to log back in.
- Take time to learn about IT security and keep yourself informed. Get Safe Online (www.getsafeonline.org) is a good source for general awareness.
- Use extreme caution before opening email attachments by first checking the sender's email address header (especially unexpected attachments from any sender). Never click on links from unknown senders within emails or on social media platforms.
- Always check website logos and spelling before responding to any requests.
- Do not accept unknown "friend" requests and do not proceed if the website is redirected
- Don't disclose/share passwords nor share any other confidential information unless you are sure that it is really necessary and appropriate on a legitimate website and that such disclosure is in line with BCA's Data Protection Policy.
- Use social media, including personal blogs, in a professional and responsible way, without violating BCA's policies or disclosing confidential information nor posting offensive material.
- Take particular care of your computer and mobile devices when you are away from home or out of the office.
- If any of your devices get lost or stolen, report the incident to your BCA reporting contact as soon as possible.

This policy is not a definitive statement. You should at all times be mindful of IT security and take steps to ensure that you are not doing anything that could harm BCA or our people.

Safeguarding Policy

BCA makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe. BCA comes into occasional contact with children and / or vulnerable adults when acting as Let In/Let Out (LILO), running or attending events, meetings and general contact around the Brookvale Village Hall (the Hall).

This policy seeks to ensure that BCA undertakes its responsibilities with regard to protection of children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation's expectations.

In producing this policy, BCA has regard to guidance issued by GOV.UK, The National Council for Voluntary Organisations (NCVO), the National Society for the Prevention of Cruelty to Children (NSPCC) and the Ann Craft Trust (ACT).

Policy Objective

Every organisation has a duty to safeguard volunteers, staff members, participants and donors. Creating a safe and welcoming environment, where everyone is respected and valued, is at the heart of safeguarding. It's about making sure BCA is run in a way that actively prevents harm, harassment, bullying, abuse and neglect. It's also about being ready to respond safely and well if there is a problem.

Roles & Responsibilities

BCA Commission will hold Trustees to account if things go wrong and will check that Trustees followed relevant guidance and the law. Trustees are expected to take responsibility for putting things right. This policy applies in all situations where a Trustee, member of staff, volunteer or participant comes into contact with children or vulnerable adults. The Trustees is responsible for the maintenance of this policy.

All members of BCA must comply with this policy.

There are no exceptions to this policy.

Safeguarding Principles

Everyone in BCA has a role to play in safeguarding. Trustees, staff, participants and volunteers need to feel comfortable and supported to raise concerns. BCA encourages openness and accountability enabling issues about safeguarding and promoting the welfare of children, young people and vulnerable adults to be discussed and addressed. It enables anyone to challenge decisions which adversely affect anyone's wellbeing. BCA strives for an environment of safety, equality and protection internally and within the services it provides. BCA identifies, assesses and reviews risks to individuals and seeks to continually improve.

Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible.

Child and adult protection is about responding to circumstances that arise.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any age, socio-economic group, gender or culture.

It can take a number of forms, including:

- Physical
- Sexual
- Emotional
- Bullying
- Neglect
- Financial (or material)
- Slavery

Definition of a child

A child is under the age of 18 (as defined in the United Nations convention on the Rights of a Child).

Definition of a Young Person

A young person is a person aged 18 upto 25 years who is a student in any education environment.

Definition of a Vulnerable Adult

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This may include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

Approach

The Trustees will ensure that BCA:

- Has appropriate policies and procedures in place which are followed by all Trustees, volunteers, staff, participants and beneficiaries
- Keeps up to date with local arrangements for safeguarding and Disclosure and Barring Service (DBS)
- Adopts safe recruitment practices such as: ensuring that people are suitable to act in their roles, not relying on reputation alone, taking referencing and where appropriate making or asking for voluntary DBS checks
- Adopts **child / young person / vulnerable adult** protection and safeguarding best practice through its policies, procedures and code of conduct for staff and volunteers

- Completes a full safeguarding risk assessment of all events that are run in the name of BCA
- Ensures that anyone representing it knows how to raise and respond to a safeguarding concern
- Does not ignore harm or down-plays failures & investigates issues that are raised, correctly and thoroughly, reporting serious incidents as necessary
- Manages and investigates allegations of abuse against someone involved in or working on behalf of BCA
- Ensures escalation and whistleblowing policies are in place for anyone who feels as though their concerns are not being addressed
- Conducts periodic reviews of safeguarding policies, procedures and practice.

Dealing with disclosures and concerns

An allegation against a person working with children and or vulnerable adults can be made by people in a range of different circumstances. Some allegations are made by the individual and some are made by colleagues, parents or members of the community. Everyone who receives information about an allegation should take it seriously and keep an open mind as to whether it might be true.

We use the terms **must** and **should** throughout this guidance. The term **must** is when the person in question is legally required to do something and the term **should** is when the **advice** set out **should** be followed unless there is good reason not to.

The person receiving the report

SHOULD

- (If on premises) Make sure children, young people or vulnerable adult (s) are safeguarded
- Seek medical attention if necessary
- Only undertake medical intervention in an emergency
- Write down what has been said and record the circumstances in which the allegation was made
- Immediately report the matter to Safeguarding Lead (Chair) Malcolm MacInnes

SHOULD NOT

- Ask leading questions if seeking clarification
- Make assumptions or offer alternative explanations
- Promise confidentiality but assurance should be given that the information will only be shared on a 'need to know' basis

The person receiving the report

SHOULD

- (If on premises) Confirm **children, young people or vulnerable adult** (s) are safeguarded
- Record details of potential witnesses
- Record the details of any discussions and the rationale for any decisions that have been made about the children, young people or **vulnerable adult**
- Within one working day of the allegation being made for:

Children:

- I. Immediate Risk of Significant Harm:

Call HCC Children's Services 0300 555 1384 (or Police 999)

- II. Within 24 hours:

Refer to the Local Authority Designated Officer (LADO): 01962 876 364

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations#:~:text=LADO%20notification%20form>

Young people:

- I. Report to the Youth Counselling website:

<https://www.hampshireyouthaccess.org.uk>

or call 02382 147 755

Vulnerable Adult:

- I. Within 24 hours:

Call HCC Adult Services:

Day Time: 0300 555 1386 (or Police 999)

Out of Hours: 0300 555 1373 (or Police 999)

<https://www.hants.gov.uk/socialcareandhealth/adultsocialcare/contact/public-referral>

- II. Non urgent with consent: Refer to the Adult Safeguarding Board:
<https://www.hampshiresab.org.uk/>

SHOULD NOT

- Investigate the allegation
- Interview the subject
- Interview potential witnesses

In all situations we will follow the instruction or guidance offered and treat each incident on a case by case basis.

If there has been an allegation that someone has:

- Behaved in such a way that has or may have harmed a child or vulnerable adult
- Possibly committed a criminal offence against or related to a child or vulnerable adult: or
- Behaved in a way that indicates they may pose a risk of harm to children or vulnerable adults

Then the Trustees must become involved.

In addition, we will refer the incident to the DBS where we remove, or would have done so had the individual not left, an employee / volunteer / Trustee because they:

- Harmed a child or vulnerable adult;
- Poses a risk of harm to a child or vulnerable adult; or

- Received a caution or conviction for a relevant offence

Where there has been a serious incident we will report the matter to BCA Commission promptly and in full. A serious incident is one resulting in or posing a risk of significant:

- harm to our beneficiaries, staff, volunteers or others who come into contact with us
- loss of our money or assets and / or damage to our property
- harm to our work or reputation

Safeguarding Code of Conduct

This behaviour code outlines the conduct that Brookvale Community Association (BCA) expects from all trustees, staff and volunteers and anyone who is undertaking duties for BCA, whether paid or unpaid.

The role of trustees, staff and volunteers

In your role at BCA when coming into contact with or when supporting activities which involve children, young people and vulnerable adults, you are acting in a position of trust and authority and have a duty of care. We expect people who take part in our services to display appropriate behaviour at all times.

You are responsible for:

- providing a safe environment for children, young people and vulnerable adults
- ensuring equipment is used safely and for its intended purpose
- having good awareness of issues to do with safeguarding, child and vulnerable adult protection and taking action when appropriate.
- following our principles, policies and procedures for safeguarding and whistleblowing
- staying within the law at all times
- modelling good behaviour for children and young people to follow and vulnerable adults to be comfortable with
- challenging all inappropriate behaviour and reporting any breaches of the behaviour code to Safeguarding Lead (Chair) Malcolm MacInnes
- reporting all concerns about abusive behaviour, this includes inappropriate behaviour displayed by an adult, child or vulnerable adult and directed at anybody of any age.

Appropriate behaviours

You should:

- ensure your contact with children, young people and vulnerable adults is appropriate and relevant to the nature of the activity you are involved in
- respect a child's, young person's and vulnerable adult's right to personal privacy as far as possible
- ensure that whenever possible, there is more than one adult present during activities with children, young people and vulnerable adults
- If a situation arises where you are alone with a child, young person or vulnerable adult, ensure that you are within sight or can be heard by other adults

- If a child, young person, or vulnerable adult specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the child, young person or vulnerable adult are
- Unless it has been agreed that the provision of personal care is part of your role and you have been trained to do this safely, only provide personal care in an emergency with victim's permission & make sure there is more than one adult present if possible.

Inappropriate behaviour

When working with children, young people and vulnerable adults, you **must not**:

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances
- develop inappropriate relationships with children, young people and vulnerable adults
- make inappropriate promises to children, young people and vulnerable adults
- engage in behaviour that is in any way abusive including having any form of sexual contact with a child, young person or vulnerable adult
- let children, young people or vulnerable adults have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children, young people and vulnerable adults.

Upholding this code of behaviour

You should always follow this code of behaviour and never rely on your reputation or that of our organisation to protect you.

If you have behaved inappropriately, you will be subject to our disciplinary procedures. You may be asked to leave BCA. We may also make a report to statutory agencies such as the police and / or the local authority child/adult protection services.

If you become aware of any breaches of this code, you must report them to Safeguarding Lead (Chair) Malcolm MacInnes. If necessary, you should follow our whistleblowing procedure.

Photography and sharing images guidance

Brookvale Community Association works with children and families, young people and vulnerable adults as part of its activities. These include: Providing pre-school groups, mother & toddler groups, drama performances, Santa's grotto, coffee mornings and other community events where children, young people or vulnerable adults will be present.

We recognise that sharing photographs and films can help us celebrate their successes & achievements, provide a record of our activities and raise awareness of our organisation. Children, their parents and carers and vulnerable adults have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.

The purpose of this guidance is to protect children, young people and vulnerable adults who take part in these services, events and activities, where photographs and videos may be taken.

We:

- always ask for written consent from a child and their parents or carers or vulnerable adults before taking and using a child's image, or the child's face **must** be unidentifiable
- take care to take photographs and film in such a way that those whose permission has not been obtained cannot be seen (i.e. from behind)
- always explain what images will be used for, how they will be stored and what potential risks are associated with sharing images of children, young people or vulnerable adults.
- make it clear that if anyone withdraws consent for an image to be shared, it may not be possible to delete images that have already been shared or published
- avoid identifying the full names of children, young people or vulnerable adults whose images are being used in our published material whenever possible (and only use first names if we do need to identify them)
- never publish personal information about individual children, young people and vulnerable adults, and disguise any identifying information (for example the name of their group or school or a school uniform with a logo)
- make sure children, young people, or vulnerable adults, their parents and carers understand how images of children, young people or vulnerable adults will be securely stored and for how long (including how we will control access to the images and their associated information)
- reduce the risk of images being copied and used inappropriately by only using images of children, young people or vulnerable adults in appropriate clothing (including safety wear if necessary)

Guidance for group leaders and participants

When children, people or vulnerable adults, parents, carers, spectators and group leaders are taking photographs or filming at our events and the images are for personal use, we publish this guidance about image sharing in the event programme and by posting a copy in the Hall.

We:

- remind parents, carers, young people, vulnerable adults and children, that they need to give written consent for the event host to take and use their images
- ask for photos taken during the event not to be shared unless permission from; young people, vulnerable adults and children, their parents and carers has been obtained
- recommend that people check the privacy settings of their social media account to understand who else will be able to view any images they share
- remind children, parents and carers who they can talk to if they have any concerns about images being shared.

Children, young people, vulnerable adults, parents and carers must also be made aware when photography and filming is part of the programme and give written consent. If we hire a photographer for one of our events, we will seek to keep children and young people safe by:

- providing the photographer with a clear brief about appropriate content and behaviour ensuring they wear identification at all times
- informing; young people, vulnerable adults and children, parents and carers, that a photographer will be at the event and ensuring they give written consent to images being taken and shared
- not allowing the photographer to have unsupervised access to children, young people and vulnerable adults
- not allowing the photographer to carry out sessions on our behalf outside the event or at a child's, young person's, or vulnerable adult's home
- reporting concerns regarding inappropriate or intrusive photography.

At All Times

If children, parents and/or carers or vulnerable adults do not consent to photographs being taken, we will respect their wishes. We will agree in advance how they would like to be identified so the photographer knows not to take pictures of them and ensure this is done in a way that does not single out the individual or make them feel isolated.

We will never exclude anyone from an activity because we do not have consent to take their photograph.

Trustees' Disputes Policy and Procedure

Who is covered by this procedure?

Trustees at BCA.

What is covered by this procedure?

This procedure explains BCA's approach to any disputes between members of its board of trustees in relation to decision-making, any grievances trustees might have with the chair of trustees or with each other, and any breaches of duty or behavioural expectations of a trustee (which may result in the trustee being asked to step down).

Purpose

The purpose of this policy is to minimise conflict through a clearly laid-out mechanism for trustees to resolve disputes and issues within the board.

BCA Commission's guidance for charity trustees in relation to decision-making requires trustees to:

- act within their powers;
- act in good faith and only in the interests of BCA;
- make sure they are sufficiently informed;
- take account of all relevant factors;
- ignore any irrelevant factors;
- manage conflicts of interest;
- make decisions that are within the range of decisions that a reasonable trustee body could make.

Where there is disagreement in relation to a particular decision or a wider dispute among trustees, BCA regulator will only get involved in exceptional circumstances. BCA regulator has made it clear that it will not substitute its own judgement for that of properly appointed trustees and that its role is not to decide on disputes or issues that arise between trustees.

The policy

Trustee disputes on decisions

BCA's approach to decision-making at board level is to seek alignment. It encourages trustees to air their views and work towards finding common ground. Where alignment with a particular course of action cannot be reached, the chair of trustees will call for a vote and the majority will carry the decision.

All trustees are subsequently expected to align behind the vote in public and in practice, although of course they have the right to continue to discuss the issue in private with their fellow trustees. In any case, BCA encourages trustees to think about accepting a decision and moving on to support it, even if it was against their advice or view.

If a trustee does not feel that they can publicly support a board decision, and this cannot be resolved through further discussion, they may be encouraged to stand down so as not to undermine the work of BCA.

If a trustee is party to a lost vote and subsequently acts to undermine that decision with the public, customers, funders or volunteers, the board reserves the right to ask the trustee to stand down.

Disputes between individual trustees

If an individual board member feels that they are being treated unfairly or in a discriminatory manner, or bullied by a fellow member of the board, and do not feel in a position to resolve the situation themselves, they should report the problem to the chair.

The chair will reserve the right to record and/or minute the conversation and details of the problem and will discuss with the complainant what course of action would help to resolve the situation.

The chair will reserve judgement until they have investigated the complaint and may involve other trustees to help in the investigation or take notes.

If the dispute remains unresolved but the chair finds against an individual trustee, then they may be asked to stand down.

Disputes with the chair

If another trustee has a dispute with the chair, the vice-chair (or a nominated member of the board) will assume all the duties in relation to the dispute that the chair would in ordinary circumstances. The same rules apply to the chair as to other trustees, and they will be asked to stand down if they are found to have breached BCA's policies, procedures or guidelines.

If the conflict and dispute is with both chair and vice-chair/a nominated member of the board, a third trustee will identify an independent individual who is not involved in the dispute to hear the case, and whose decision will be put to the board for a vote.

Examples of behaviours that may lead to a trustee being asked to stand down

Behaviours that may lead to a trustee being asked to stand down include, but are not limited to:

- persistent failure to perform duties expected of them as a trustee;
- regular absence from board meetings or a persistent failure to engage with reasonable communications;
- disparaging or rude communication towards a fellow trustee, member of staff, volunteer or beneficiary;
- bullying or harassment of a colleague or any staff member, including derogatory comments or jokes in private messengers or social media;
- failure to publicly support decisions or positions made by the board;
- serious breach of any of BCA's policies and procedures;
- attitude which is deemed to be negative and unhelpful;
- being derogatory or offensive about BCA or any of its associates, volunteers, beneficiaries or customers publicly, including online or on social media;
- any other behaviour that BCA reasonably deems to be inappropriate;
- misuse of information. (e.g. confidential material including staff records, accounting information or copyright material owned by BCA);
- breach of health and safety which may endanger life or cause serious injury or seriously negative impact on the mental health and well-being of others.

The process

Establishing the facts

The chair of trustees (or the vice-chair/a nominated member of the board if the dispute concerns the chair) should lead the investigation of a potential dispute without unreasonable delay to establish the facts of the case. This may require holding an investigatory meeting with the individuals concerned and an attempt to resolve the dispute before taking any further action. BCA commits to conducting the investigation without undue delay and updating all parties regularly with expected time frames.

An investigatory meeting will not by itself necessarily result in any action.

Informing relevant parties about the problem

If the chair (or the vice-chair/a nominated member of the board) decides that there is a case to answer, they will inform the relevant parties in writing. This notification should contain sufficient information about the alleged misconduct or poor performance and its possible consequences to enable the trustee concerned to prepare to answer the case at a meeting. Along with the notification, the chair (or the vice-chair/a nominated member of the board) will provide copies of any written evidence, which may include any witness statements.

The notification will also give details of the time and venue for the meeting. Trustees do not have rights in employment law to trade union representation; however, they may bring along an independent supporter. Under usual circumstances this supporter cannot be a fellow member of the board because of potential conflict of interest and the possibility of creating factions within the board.

No action will be taken until the matter has been fully investigated and the parties have had time to reflect and see if the dispute can be resolved amicably.

The decision

After the meeting, the chair (or the vice-chair/a nominated member of the board) will decide what is the appropriate course of action and if the trustee concerned should be asked to stand down. They should communicate this decision communicated to the whole board for their ratification prior to the final decision being communicated to the trustee concerned.

The right to appeal

The decision of the chair (or the vice-chair/a nominated member of the board) is final. There is no right of appeal, and if a trustee is asked to stand down, they will be expected to do so immediately.

BCA has the right to share information about the trustee if it is asked for references for future board appointments.

Trustees' Expenses Policy

Who is covered by this policy?

All BCA's trustees.

What is covered in this policy?

This policy outlines what expenses trustees may claim and how BCA will reimburse them.

Purpose

The purpose of this policy is to ensure that trustees understand under what circumstances they can claim expenses for their work as a trustee.

The policy

BCA aims to ensure that no existing or potential trustee is excluded from acting as a trustee on the basis of their financial circumstances. To achieve that, BCA will reimburse reasonable expenses incurred by trustees on BCA business.

Guidelines

If trustees have incurred valid expenses, they should provide full details (including receipts or invoices and their bank account information) to the Treasurer who will authorise the expenses and arrange reimbursement.

Examples of valid reimbursement include:

- the reasonable cost of travelling to and from trustee meetings and on charity business;
- the reasonable cost of childcare while attending trustee meetings;
- the cost of postage and telephone calls on charity business;
- communication support such as the cost of translating documents into braille or another language;
- the cost of providing special transport for trustees with disabilities;
- the cost of necessary reasonable overnight accommodation and subsistence while attending trustee meetings or other essential events.

Examples of costs that BCA will not reimburse include:

- the loss of earnings while carrying out trustee business;
- payments for specialist skills and services;
- flat-rate expense payments (e.g. £5 per meeting);
- payments for costs which are incurred regardless of extra use, such as telephone line rental;
- payments for car mileage that are above HM Revenue and Customs limits.

Trustees expenses will only be reimbursed with a valid receipt.

BCA encourages trustees to incur only minimal costs and to defray expenses in other ways if legitimate or reasonably practicable.

Virtual Meetings Policy and Procedure

Who is covered by this policy?

All staff, trustees and volunteers.

What is covered by this policy

This policy outlines the principles and guidelines for conducting inclusive and effective virtual meetings both within BCA and with external stakeholders.

Purpose

BCA wants to ensure that virtual meetings are run well and that participants enjoy them. As much as possible, it wants to organise and run virtual meetings to be as effective as face-to-face meetings, taking into account how challenging that can be.

The policy

BCA expects its trustees and volunteers to take virtual meetings as seriously as they would a face-to-face meeting. This means preparing properly prior to the meeting, using agendas, presenting themselves appropriately, turning up on time, keeping notes, engaging fully and managing conversations courteously.

The protocols

- Meeting organisers should open the virtual meeting space at least five minutes before the meeting – this allows people to come in when ready and means there is a better chance of the meeting starting on time.
- Meeting organisers should specify in the meeting invitation and on the agenda who is responsible for initiating/hosting the call.
- Be aware that body language and other indicators do not translate that well through video conferencing. You might need to use more specific questions and explain more verbally. Don't assume that because people haven't spoken they don't have a view. You may need to ask individuals directly to share what they think.
- Agree the ground rules for the meeting at the start of that meeting. For example, for some meetings it is appropriate for all attendees to be muted; for others, it is better and more natural to be able to speak freely.
- For the most part, the chat function should be avoided as it can distract attention from those who are speaking.
- Always ask permission before recording a meeting and explain your reasons for doing so (e.g. to help with minute taking).

Volunteer Management Policy

Who is covered by this policy?

Volunteers, and anyone working with them.

What is covered in this policy?

This policy outlines how BCA will appoint and support its volunteers.

Purpose

The purpose of this policy is to ensure that BCA gives its volunteers the best support possible during their time at BCA.

The policy

Attracting volunteers

BCA will establish a network of volunteer sources, such as Basingstoke Voluntary Action, BCOT and other similar charitable organisations and groups. Under ordinary circumstances, prospective volunteers who approach BCA with enquiries via phone or email should be asked to email the Chair a copy of their CV and a covering letter explaining their interest in volunteering for BCA. Nevertheless, BCA will be flexible to volunteering requests however they arrive in order to accommodate anyone who is interested in volunteering. BCA will ask all prospective volunteers to attend an informal meeting to discuss how they can help BCA and how BCA can help them.

If, after the discussion, BCA and the volunteer decide to go ahead with a volunteering opportunity, the prospective volunteer will be written to, to confirm this and set out the expectations of both parties.

Induction and training

A nominated person will usually prepare and deliver the induction, which should cover:

- information about BCA, including where to access all policies and procedures, its vision and mission and its future plans;
- the role of the volunteer;
- essential procedures, such as timekeeping, rota and confirmation of legally acceptable hours worked if the volunteer claims benefits;
- information about training and ongoing learning opportunities;
- information about volunteering from home and what support is available.

BCA will have a trial period of four weeks to give BCA and the volunteer time to discover if they are suited to each other. It will have a review midway through the trial period and also at the end. This review is not an assessment. It is to ensure that both BCA and the volunteer benefit from the volunteering experience.

Support

A nominated person will offer ongoing support and will remain the volunteer's key contact throughout their volunteering with BCA.

Expenses

Reasonable expenses can be claimed through submitting a valid receipt to the Treasurer who will arrange for reimbursement.

Insurance

BCA's insurance policy ensures that volunteers are covered. A copy is available on request.

Resolving Problems

BCA hopes that its volunteers will have an enjoyable experience volunteering with it. However, if their role as a volunteer does not meet their expectations or BCA has not met the commitments anticipated, BCA wants volunteers to feel comfortable about letting it know. Likewise, if the volunteer is not meeting BCA's expectations, it should raise this with the individual.

If there is a concern, volunteers should, first of all, speak to the nominated person in order to sort things out before they become a problem. If they do not feel this will resolve things, they should speak to another trustee.

Confidentiality

BCA expects all volunteers to adhere to confidentiality guidelines which will be explained to them before they begin volunteering with BCA. This also includes the use of social media and contact with any press.

Equality, equity, diversity and inclusion

BCA is committed to embracing diversity and promoting equality, equity and inclusion. When representing BCA, it will expect volunteers to support BCA's commitment to maintaining and promoting equality.

Whistle-blowing Policy

Who is covered by this policy?

All staff, trustees and volunteers.

What is covered by this policy?

This policy outlines how to raise issues of concern which fall outside the scope of other BCA policies and procedures, and how staff are protected against any ramifications of raising issues.

Under the Public Interest Disclosure Act 1998, a whistle-blower is prevented from suffering any detriment or having their contract of employment terminated for whistle-blowing for any matter which they raise under this policy. Under the Employment Rights Act 1996, workers who become whistle-blowers are protected where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. According to the Public Interest Disclosure Act 1998, the disclosure has to be 'in the public interest'.

Purpose

The purpose of this policy is to ensure that everyone understands what constitutes a whistle-blowing matter and what their rights and responsibilities are in relation to exposing wrongdoing.

The policy

This policy is for dealing with concerns raised in relation to specific issues which are in the public interest.

These include:

- the unauthorised use of BCA's funds;
- possible fraud or corruption;
- sexual, emotional or physical abuse or ill treatment or exploitation of beneficiaries, customers or staff;
- health and safety risks (including risks to the public as well as other employees or the potential for harm);
- conduct which is a criminal offence or breach of the law, including failure to comply with legal obligations;
- disclosures related to miscarriages of justice (where BCA has acted improperly or unfairly);
- damage to the environment;
- other unethical conduct, including any deliberate concealment of any of the above.

The legal protections provided by the legislation, require any whistle-blower to satisfy certain conditions and have followed the prescribed procedures. The following applies:

- Disclosure to the Trustees will be protected, provided that it is made in good faith and the whistle-blower has a reasonable suspicion that the alleged malpractice has occurred, is occurring or is likely to occur.
- Disclosure to a regulator (for example, The Health and Safety Executive, The Environment Agency or BCA Commission for England and Wales) will be protected where, in addition, the whistle-blower honestly and reasonably believes that the information and any allegation in it are substantially true.
- Disclosure to other bodies is protected if, in addition to the above, it is reasonable in all the circumstances and is not made for personal gain.

The whistle-blower must also meet one of the following requirements:

- They reasonably believed that they would be victimised if they raised the matter internally.
- They reasonably believed that the disclosure related to a criminal offence and, therefore, was a 'qualifying disclosure'.
- There was no appropriate regulator in relation to the specific issue, and they reasonably believed the evidence was likely to be concealed or destroyed.
- The concern had already been raised with the employer or an appropriate regulator.
- The concern is of an exceptionally serious nature.
- They had suffered an identifiable detriment.

BCA encourages everyone to raise in good faith concerns they may have regarding any procedure or practice within the organisation.

BCA will ensure that anyone who makes a disclosure along the lines listed above will not be penalised or suffer any adverse treatment for doing so.

This policy only applies to issues which fall outside the scope of *BCA's* other policies and procedures. If it becomes apparent to the external investigator, during the course of any investigation into a public interest disclosure, that the concern relates more appropriately to another procedure, that procedure will be invoked.

The procedure

If you have a concern about malpractice, you should raise it first with the chair of trustees. This will depend upon the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

If you believe that the Chair of Trustees is involved or you feel, for whatever reason, unable to raise it with them, you should then raise the issue with any other trustee.

You should put your name on the complaint. If requested, your identity will be kept confidential for as long as possible, provided that this does not prejudice the enquiry.

Anonymous complaints may be investigated or acted upon as the person receiving the complaint believes to be appropriate, having taken into account the seriousness of the issue raised, the credibility of the complaint, the prospects of being able to investigate an anonymous complaint and fairness to any individual mentioned in the complaint.

BCA will always respond to any concerns raised. A nominated investigating officer will investigate the concern.

Within ten working days of a concern being raised, the person investigating the concern will write to you:

- acknowledging the concern has been received;
- indicating how it is proposed to deal with the matter;
- giving an estimate of how long it will take to complete the investigations;
- telling you whether any initial enquiries have been made;
- supplying you with information on how BCA will support you if you think this is necessary.

The amount of contact between you and the person considering the matter will depend on the nature of the matter raised, the potential difficulties involved and the clarity of the information provided.

BCA will take steps to minimise any difficulties which you might experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, it will make arrangements for you to receive advice about the procedure.

If you feel that BCA has not responded correctly at any stage, remember that you can bring up the matter with external authorities.

While BCA cannot guarantee that all matters will be addressed in the way that you might wish, it will always aim to handle the matter fairly and properly. By following this policy, you will help BCA achieve this.

If you do take the matter outside BCA, you should not disclose confidential information unless necessary for the investigation.

If your concern is not substantiated, you should not take any subsequent action or make any disclosure to anyone other than those referred to in this policy.