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# Grant-making policy

**WESTPARK LEVY TRUST**

**A registered charity in England and Wales (186861)  
Adopted by the Charity Trustees on 10 December 2019  
Last reviewed on December 2022**

## 1. About this policy

1.1 This policy applies to The Westpark Levy Trust (**Charity**), a charity registered in England and Wales (number 186861).

1.2 The charitable objects of the Charity are to:

- (a) to provide facilities and support initiatives to enhance the community and promote community spirit and engagement within the area of Westpark Garden Village locality and surrounding area located in Darlington.
- (b) to promote, enhance, improve and protect and conserve the natural and built environment within the Westpark Garden Village locality and surrounding areas for the benefit of those living and working in the area or visitors to the area.
- (c) to direct all funds in the trust for use for charitable purposes only for the benefit of the local area.
- (d) The promotion of community participation in healthy recreation for the benefit of the inhabitants of the local area by the provision of facilities and areas for recreation

the (**Objects**).

1.3 The Charity is governed by the charity trustees of the Charity (**Charity Trustees**) who have a duty, acting at all times in the best interests of the Charity, to apply the Charity's assets to advance the Objects and have ultimate responsibility for all grant-making decisions.

1.4 The purpose of this policy is to set out the principles and procedures that guide the Charity Trustees when they are making grants to further the Objects. It also provides information about the Charity's grant-making process to anyone who is applying to the Charity, or would like to apply to the Charity, for a grant.

1.5 In this policy references to persons who are "connected" with a Charity Trustee mean:

- (a) a child, stepchild, grandchild, parent, brothers or sister of a Charity Trustee;
- (b) the spouse, unmarried partner or civil partner of a Charity Trustee or of any person falling within paragraph (a) above;
- (c) any person who is in a business partnership with a Charity Trustee or any person who is in a business partnership with any person falling within paragraph (a) or (b) above; and
- (d) any company, business, trust or organisation in which a Charity Trustee (or any other person connected to them) has an interest as a beneficiary or through ownership, control or influence.

## **2. Our funding priorities**

2.1 The Charity Trustees are keen to support activities that advance the Objects in an effective way. However, they recognise that a limited amount of funds are available to distribute each year. The Charity Trustees' current funding priorities are:

- (a) It must benefit and enhance the green space area of Westpark in Darlington and its users, visitors and the public at large and be for a defined project;
- (b) any other priorities as decided by the trustees

2.2 The Charity Trustees will not normally support:

- (a) Anything which is not for the benefit of the area of Westpark Garden village in Darlington, it's inhabitants or green space and bio diversity of the area;
- (b) Overseas charities;;
- (c) Applications from charities or organisations whose annual profit is more than £1,000,000.00

2.3 The Charity Trustees will occasionally award grants that fall outside the priorities stated in this policy, provided that they are satisfied that the grant will further the Objects and is an appropriate use of the Charity's funds.

2.4 The Charity Trustees will review the grant-making priorities and principles set out in this policy annually.

## **3. Who can apply for a grant**

3.1 The Charity Trustees welcome proposals that support their funding priorities from local organisations, recognised institutions and government bodies and in exceptional circumstances individuals.

3.2 The Charity Trustees will usually only award grants to organisations based in the United Kingdom (**UK**).

3.3 However, the Charity Trustees will also consider proposals from charities that are established outside the UK and non-charitable organisations that are established either in the UK or elsewhere.

3.4 The Charity Trustees will not award grants to an applicant that has:

- (a) previously submitted a proposal where the applicant failed the Charity Trustees' due diligence checks and the issues identified at that time have not been addressed;
- (b) applications/proposals where a linked management plan with SMART objectives has not been submitted with the application.

#### **4. What we will fund**

- 4.1 The Charity Trustees usually make small grants of between £1,000.00 and £5,000.00. Medium Grants between £5,001.00 and £50,000.00. Only in exceptional circumstances will grants be awarded in excess of £50,000.00.
- 4.2 All grants awarded by the Charity must be used to cover costs that are directly connected to carrying out the charitable activities that the Charity Trustees have agreed to fund (**Funded Activities**). Unless the applicant is able to demonstrate that the expenditure is essential for, and directly linked to, the Funded Activities, grants must not be used to fund any of the following types of expenditure:
- (a) Greater than 20% of grant used for salary costs;
  - (b) capital expenditure, the applicant must also be able to demonstrate that any assets acquired using grant monies will be used within Westpark for similar purposes after the end of the Funded Activities; and or within Darlington Borough
  - (c) contributions to the cost of overheads.
- 4.3 The Charity Trustees will award grants to fund up to 100% of the cost of a proposal. However the Charity Trustees:
- (a) will consider funding part of the cost of a proposal where the total cost is shared with one or more other funders; and
  - (b) encourage applicants to seek additional sources of funding for their proposal.
- 4.4 If a grant covers part of the cost of a proposal, the Charity Trustees may require the applicant to provide details of the other funder(s) and the funding that they have secured or applied for (including any loans or other commercial funding).

#### **5. How to apply for a grant**

- 5.1 All grant proposals should be made in writing, but other formats will be accepted as agreed by the Trustees. Proposals must explain in detail how the grant will be used and put forward a strong case for support. In particular, a proposal must:
- (a) demonstrate how the activities funded by the grant will benefit the intended beneficiaries and advance one or more of the funding priorities;
  - (b) set out how use of the grant will be managed;
  - (c) give details of the key individual(s) who will be responsible for the management of the grant and delivering the proposed activities;
  - (d) provide a budget for the proposed activities; and
  - (e) give details of any other funding that has been awarded or that is being sought for the activities to be funded by the grant;

5.2 If the application is made by or on behalf of an organisation, the following must also be provided with the proposal:

- (a) a complete, up-to-date copy of the organisation's governing document;
- (b) if the organisation is a UK charity:
  - (i) its registered charity number(s) as issued by the Charity Commission for England and Wales, the Office for the Scottish Charity Regulator and/or the Charity Commission for Northern Ireland; and/or
  - (ii) if it is a charity under the law of England and Wales that is not required to register with the Charity Commission for England and Wales (because it is either an exempt or excepted charity, or has income below the registration threshold), evidence of its charitable status (such as an HMRC reference number);
- (c) the organisation's most recent set of accounts; and
- (d) any other reasonable requirements the Trustees make as a requirement.

5.3 If the applicant is a non-charitable organisation / individual the proposal must also:

- (a) provide identification evidence of the person making the application on behalf of the non-charitable organisation and evidence of the that they are duly authorised to make the application;
- (b) provide evidence that the organisation has a bank account, and for individual a sponsor to look after the charities grant, monies will not be paid into an individual personal bank account; and
- (c) demonstrate that all of the activities in the proposal will enhance the Charities Objects. qualify as being charitable for the public benefit if they are undertaken by an organisation that is registered as a charity in England and Wales.

## **6. How we make decisions about grants**

6.1 The Charity Trustees have ultimate responsibility for all grant-making decisions and for ensuring that all funds awarded are used to advance the Objects.

6.2 The Charity Trustees must declare the nature and extent of any interest, direct or indirect, which could, or could be seen to, prevent them from making a grant decision only in the best interests of the Charity. Situations in which a conflict of interest may arise include where:

- (a) a Charity Trustee (or a person connected to them) stands to benefit from a grant from the Charity; or
- (b) a Charity Trustee has a duty of loyalty to a third party that conflicts with their duty to the Charity.

Any such conflict of interest must be declared and managed by the Charity Trustees in accordance with the Charity's conflicts of interest policy.

- 6.3 The Charity Trustees may delegate certain decision-making responsibilities in accordance with the Charity's scheme of delegation. In particular:
- (a) the Charity Trustees have appointed a grants committee to review grant proposals and make recommendations to them;
  - (b) individual Charity Trustees and/or members of the Charity's staff may be asked to review grant proposals and make recommendations to the Charity Trustees; and
  - (c) before making a decision to award a grant, the Charity Trustees may ask anyone they consider has relevant expertise or experience to provide them with information and to join in their discussions, but not to take any part in the final decision.
- 6.4 In all cases where a recommendation is made to them to award a grant, the Charity Trustees may (in their absolute discretion) refuse to approve that recommendation, particularly if they consider that a grant would not be an effective way to further the Objects, or would conflict with the Charity's policies or interests.
- 6.5 The Charity Trustees may take up to six months to consider grant proposals and decide if they will award a grant or not.
- 6.6 The Charity Trustees will inform applicants of their decision in writing.
- 6.7 If an applicant is awarded a grant, the Charity Trustees will:
- (a) set out the key terms of the grant and any conditions that are attached to it in a grant letter; and
  - (b) ask the applicant to sign the grant letter to indicate that they accept the terms and conditions.
- 6.8 If the Charity Trustees decide not to award a grant for a proposal the Charity Trustees are not obliged to give the applicant reasons for their decision but will endeavour to give feedback .
- 6.9 The Charity Trustees' decision whether to award a grant is final.

## **7. Grants to charity trustees or connected persons**

- 7.1 If an application for a grant is made to the Charity by a Charity Trustee, or a person connected to them, the non-conflicted Charity Trustees may therefore consider making the grant in accordance with this policy.
- 7.2 If a Charity Trustee, or a person connected to them, applies for a grant the conflicted Charity Trustee must:
- (a) absent themselves from any discussion of the grant application by the non-conflicted Charity Trustees;

- (b) have no vote and not be counted as part of the quorum in any decision of the non-conflicted Charity Trustees on the grant.

## **8. Due diligence**

8.1 When the Charity Trustees are considering a grant-funding proposal, they will undertake due diligence checks on the applicant. The checks that are undertaken will vary according to the Charity Trustees' assessment of any risks associated with the proposal or the applicant.

8.2 Due diligence may include requesting details of, and taking such steps as the Charity Trustees consider to be reasonable to scrutinise, any of the following:

- (a) the applicant's governing documents;
- (b) if applicable, the applicant's status as a charity, including (where it is required to do so) evidence that the applicant has been registered with a charity regulator;
- (c) the applicant's latest accounts and financial position;
- (d) the identity of the applicant's directors, trustees, executive committee or other key personnel, in particular, to seek to establish whether they are authorised to act in that capacity;
- (e) the applicant's governance and operational structures and practices;
- (f) the applicant's internal financial controls;
- (g) relevant operational policies and procedures that the applicant has in place, for example, in relation to safeguarding children and vulnerable adults, and on equality and diversity;
- (h) the applicant's aims and values; and
- (i) any external risk factors that might affect the proposal.

8.3 In cases where the applicant will receive support from another funder, or works with a partner, the Charity Trustees may undertake due diligence on that funder or partner.

8.4 The Charity Trustees will keep a written record of any due diligence that they undertake.

## **9. Reporting requirements and monitoring**

9.1 The Charity Trustees will take steps to monitor the use of the grant and verify that the grant is used for the purposes that have been agreed. The arrangements for monitoring will vary according to the nature of the grant, but the Charity Trustees will always seek to ensure that the arrangements are appropriate and proportionate.

9.2 Arrangements for monitoring use of the grant may include asking the recipient to provide any of the following:



- (a) copies of formal records such as receipts, invoices, bank statements and management accounts to show that funds have been used for the purpose for which they have been awarded and in accordance with the terms of the grant;
  - (b) regular written or verbal updates showing progress to date, summarising key achievements or problems encountered, indicating whether targets have been met and giving reasons for any delay in implementing work funded by the grant;
  - (c) a final written report on completion of the work funded by the grant, showing how funds have been spent, evaluating where the work has been successful and identifying lessons that can be learnt; and
  - (d) information about any proposed changes to the proposed activities.
- 9.3 If appropriate, the Charity Trustees may also visit grant-funded activities and interview individuals involved in running those activities.
- 9.4 Basic monitoring requirements will be set out in the grant letter. However, the Charity Trustees may take any additional steps to monitor the use of grant funds that they consider appropriate.

## **10. Clawback and repayment**

The Charity Trustees may require repayment of all or any part of the grant if:

- (a) the project or purpose for which it was awarded does not proceed;
- (b) part of the grant remains unused when the activities that the grant was intended to fund have been completed; or
- (c) the grant is used for a purpose other than that which has been agreed.

## **11. Reviewing and amending this policy**

- 11.1 This policy will be reviewed by the Charity Trustees at least annually.
- 11.2 The Charity Trustees may vary the terms of this policy from time to time.

# Complaints Policy

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

For a serious concerns, for example:

- not doing what our charity it claims to do
- losing lots of money
- harming people
- being used for personal profit or gain
- involved in illegal activity

## Raising a serious concern

The Charity Commission regulates registered charities in England and Wales. They make sure that charities are accountable, well-run and meet their legal obligations.

They do this by providing regulatory advice and guidance. We will also intervene in matters where there is serious risk of significant harm to, or abuse of, charities, their beneficiaries or assets.

Before submitting a complaint you must:

- complain directly to the charity first - you can *find contact details of charities on the charity register - or be able to explain why you could not do this*
- *check if you should complain to the Charity Commission or a different organisation*

## INFORMAL COMPLAINTS

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

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

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

Advise the complainant that their concern will be passed to the trustees.

## **FORMAL COMPLAINTS**

Where an individual wishes to make a formal complaint, they will be provided with the e mail address of the nominated lead trustee for complaints and/or our registered address, as they wish. Correspondence should be marked private and confidential. They will be provided with a copy of this policy.

To help resolve the complaint as quickly and effectively as possible, the individual making the complaint should do so as soon as possible and should include in it:

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

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

A response will be sent within 28 working days. If this is unlikely to be achieved or is not possible, a holding reply will be sent after 14 days advising when we estimate the investigation will be completed. The complaint response will explain our findings and what action we will be taking/have taken, subject to the constraints of the law and recognised best practices, which will almost certainly not allow us to disclose sensitive personal information.

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

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

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

## **WIDER ACTION**

Irrespective of the outcome of any complaint, we will consider if there is any requirement in respect of wider action and/or statutory reporting to the *Charity Commission*, *H&SW Executive*, other regulator, or the *Police*.

Consideration will also to be given to whether any changes should be made to policies, procedures, training etc to see if anything might reasonably be done to prevent a similar issue arising in future.

## **ANONYMOUS COMPLAINTS**

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

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

## **CONFIDENTIALITY**

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

## **AVAILABILITY**

This policy is to be made publicly available and given to anyone who advises that they wish to submit a complaint.

# Conflict of Interest Policy

The guidelines on managing conflict of interest are contained in our governing document and will be followed at all times, as will the guidance issues by the Commission listed at the end of this policy.

## Conflicts of Interest

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

There are 2 common types of conflict of interest:

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

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

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

## Related Parties

We have a close working relationship with both Darlington Borough Council and the West Park Levy Collector, Kingston Open Spaces. However the WestPark Levy is an independent legal entity and it's trustees make decisions in the best interest of meeting the Charities objectives.

It is important that we are not only demonstrably independent of them, but also seen to be. Consequently, trustees who have a close personal or working relationship with a partner organisation, grant recipient or contractor involved in a project, trustees will declare this, as a conflict of interest.

## Meetings

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

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

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

If a trustee states a conflict of interest they will normally be requested to leave the meeting while the relevant agenda item is discussed.

## **Potential Conflicts of Interest**

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

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

## Managing Conflicts of Interest

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

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

## Recording Decisions

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

## Regulatory Guidance

Charity Commission:

- *Conflicts of interest: a guide for trustees.*
- *Payment to trustees*
- *Selling/leasing to someone connected with the charity*
- *Trustee disqualification*
- *Examples of personal benefit*

# Environmental Sustainability Policy

## Aims

We will reduce and effectively manage our impact in a responsible manner, by ensuring that environmental considerations are integrated into decision making.

Risk assessment will be used to identify potential environmental risks and where these are identified, strategies will be implemented to eliminate or minimise these risks.

## Applicability

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

## The Need & Our Responsibility

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

## Impact on the Environment

The Trust’s objective of Caring for the environment and increasing biodiversity, this policy will help us achieve our ambition and act as a reminder of this objective in our decision making.

## Managing our Impact

Our actions and it’s Impact can be managed through the Waste Hierarchy below:

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



If working with a commercial partner, we could ensure they've signed up to the *TRUST registration scheme*.

## **Areas to Consider**

- **Materials and Resources**
- **Managing Waste**
- **Energy Use**
- **Water Use**
- **Emissions and Transport**
- **Suppliers**
- **Investment**
- **Management**
- **Communication**

## **Regulatory Guidance:**

*Charity Commission: Going Green: Charities and Environmental Responsibility*

*Charity Commission: Environmental responsibility for charities*

*Environment Agency: Waste Management*

## **Useful Links:**

*ES: Energy saving opportunity scheme (ESOS)*

*CT: Guidance on complying with ESOS*

*CT: Employee awareness and office energy efficiency*

*CT: Building energy efficiency*

*CT: Energy efficient lighting*

*WRAP (Waste & Resources Action Programme)*

*Recycle Now*

*Centre for Alternative Technology (CAT)*

*Charity Retail Association: Waste Law & Regulation Guidance Note.*

# Reserves Policy

## Scope

This reserves policy explains to existing and potential funders, donors, beneficiaries and other stakeholders why we are holding a particular amount in reserve. It gives confidence to stakeholders that our finances are being properly managed and will also provide an indicator of future funding needs and our resilience.

## Oversight

Our reserves policy is a live document, so describes the process we will follow in deciding the amount to keep in reserve. The amount held in reserves will be monitored during the course of the year as part of our budgetary process and financial monitoring.

## Reserves

**Reserves.** Are that part of our unrestricted funds that is freely available to spend on any of our purposes. The items excluded from reserves are:

- tangible fixed assets used to carry out the charity's activities, such as land and buildings.
- programme-related investments those held solely to further the charity's purposes.
- designated funds set aside to meet essential future spending, such as funding a project that could not be met from future income.
- commitments that have not been provided for as a liability in the accounts.

**Restricted Funds.** Fall outside the definition of reserves, but the nature and amount of such funds may impact on a charity's reserves policy. Where significant amounts are held as restricted funds the nature of the restriction should be considered, as such funds may reduce the need for reserves in particular areas of the charity's work.

**Reserves Held by Subsidiaries or other organisations.** Where group accounts are prepared, the annual report will provide a narrative of the group's activities. In particular, the amount of reserves stated must take account of the net assets of subsidiaries and the Levy Managing agent if applicable.

## Developing Our Policy

There is no single method or approach to setting a reserves policy and the right approach depends on the size, complexity of activities, legal structure and the nature of funds received and held by our charity. The process we use involves:

- Consideration of the nature of the funds received and held by the charity:
  - Are the funds unrestricted or restricted income?
  - Is an endowment an expendable endowment or permanent endowment?
  - Understanding the nature of the funds allows trustees to identify unrestricted funds which can be spent on any purposes of our charity.

Including future budgets and future projects or spending plans that cannot be met from the income of a single year, and uncertainties we may face in the future, such as the need to hold some reserves to meet an unexpected call on funds or opportunities that may present themselves.

We will use the above process to identify why reserves might need to be held and to decide the amount of reserves needed to operate effectively. We use the Charity Commission guidance on reserves

The basis of a good reserves policy is thinking through exactly why you might need to hold back some funds as reserves. In a small charity, with a simple structure and uncomplicated activities, the reasons might include:

- a) The risk of an unforeseen emergency or other unexpected need for funds, eg an unexpected large bill or finding 'seed-funding' for an urgent project
- b) Covering unforeseen day-to-day operational costs,
- c) A source of income, Funds might be needed to give the trustees time to take action if income falls below expectations
- d) Planned commitments, or designations, that cannot be met by future income alone, eg plans for a major asset purchase or to a significant project that requires the charity to provide 'matched funding'
- e) The need to fund short-term deficits in a cash budget, eg money may need to be spent before a funding grant is received

## Levels of Reserves

Our target level of reserves may be expressed as a target figure and will be informed by:

- Our forecasts for levels of income for the current and future years, taking into account the reliability of each source of income and the prospects for developing new income sources
- Our forecasts for expenditure for the current and future years on the basis of planned activity
- Analysis of any future needs, opportunities, commitments or risks, where future income alone is likely to fall short of the amount of the anticipated costs
- Assessment, on the best evidence reasonably available, of the likelihood of a shortfall arising which means that reserves are necessary, and the potential consequences for the charity of not being able to make up the shortfall.

## **Monitoring of Reserves**

We will keep our reserves policy and the level of reserves held under review, monitor the level of reserves held throughout the year to establish the reason for any significant difference with the target level set. If reserves during the year are below target or exceed target, we will consider whether this is due to a short-term situation or a longer-term issue, and take any appropriate action.

## **Annual Reporting**

We will include in our annual report our policy on reserves, stating the level of reserves held and why these are held. If material funds have been designated, the reserves policy statement will quantify and explain the purposes of these designations and, where set aside for future expenditure, the likely timing of the expenditure.

We will ensure that our reporting of our reserves policy meets the requirements of the *Charities Statement of Recommended Practice (SORP) (FRS 102) and the requirements of the Regulations*.

## **Investing Reserves**

When significant resources are held in reserves from year to year, the trustees will consider whether some or all of the reserves can be invested to obtain a financial return for the charity. In making the investment decision, the trustees will consider when the reserves might be needed (liquidity of the investment) and the acceptable level of investment risk.

## **Regulatory Guidance**

Charity Commission - *Charity reserves: building resilience*.

Charity Commission - *Managing a charity's finances: planning, managing difficulties and insolvency (CC12).*

Charity Commission - *Charities and Risk Management.*

Charity Commission - *Example trustees' annual reports and accounts for charities.*

Charity Commission *Operational Guidance 43 – Reserves.*

# Risk Management Policy

## Introduction

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

## Purpose

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

## Scope

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

## Charity Commission Guidance

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

## Risk Management Cycle

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

- **Identification.** Identify the various risks that may materialise.
- **Quantifying.** Assess and quantify these risks.
- **Managing.** Take appropriate action to manage these risks. This is usually the weakest area in a risk management framework. Risks can be managed as follows:
  - **Avoidance.** Action that can be taken to avoid a risk occurring.

- **Mitigation.** Action that can be taken to reduce the impact a risk may have, if it occurs.
- **Buying Out.** Generally, this is done using insurance.
- **Accepting.** Risk cannot be eliminated entirely, and any steps taken to manage risk must be reasonable, as resources are not unlimited in terms of money and time. Equally, adopting a purely risk averse approach limits opportunity.
- **Reviewing.** Risks should be reviewed as regularly as is necessary, depending on their likely probability and impact in the light of changing circumstances. This may be done on an ongoing basis, at appropriate points in projects or at regular meetings.

## Responsibilities

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

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

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

## Risk Identification and Assessment

Risks will be identified through regular risk assessments conducted at least annually.

Identified risks will be assessed based on likelihood and impact to determine the level of risk.

Risks will be categorized as strategic, operational, financial, or compliance related.

## Risk Mitigation and Management

Strategies for risk mitigation will be developed for high-priority risks.

Mitigation plans will be assigned to responsible individuals with clear timelines.

Regular monitoring and reporting on the progress of risk mitigation plans will be conducted.

## Reporting and Communication

A risk and conflicts register will be maintained and regularly reviewed by the Board of Trustees.

Key risks and mitigation efforts will be communicated to relevant stakeholders.

The Board will report on the steps it has taken to manage risk, to demonstrate the charity's accountability to its stakeholders including beneficiaries, donors, funders, employees and the general public.

## Review and Continuous Improvement

The risk management policy and processes will be reviewed annually or as needed.

Lessons learned from risk events will be used to improve risk management practices.

## Training and Awareness

Staff and volunteers will maintain an up to date awareness on risk management principles and practices.

## Useful links

[Charity Governance Code: 4 Decisions, Risk, Control](#)

[HSE: Charities](#)

[CFG: Charity Fraud Guide](#)

[ICAEW: Risk Management](#)

[CFG: Rethinking Risk](#)



[Gov.uk: Data Protection Act](#)

## **Charity Commission E&W**

[CC: Fundraising legally and responsibly](#)

[How to manage risk in your charity](#)

[Charities and Risk Management](#)

[CC: Charities, fraud and financial crime](#)

[Managing International Risk](#)

[CC: Charities and terrorism](#)

[CC: Protecting charities from abuse for extremist purposes](#)

[CC: Moving and receiving funds safely](#)

[CC: Keeping money safe](#)

# Safeguarding Policy

## Purpose

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

## Lead Trustee

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

Lead Trustee	Neil Brimer
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## Applicability

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

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

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

## Principles

We believe that:

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

## **Types of Abuse**

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

## **Reporting Concerns**

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

If you are a beneficiary, or member of the public, make your concerns known to a member of our team, who will alert the trustees via the Safeguarding Lead of the charity.

If you feel unable to speak to the lead Trustee, speak to any other trustee.

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

## **Responsibilities**

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

Trustees are aware of and will comply with the Charity Commission guidance on *safeguarding and protecting people* and also the *10 actions trustee boards need to take* to ensure good safeguarding governance.

A lead trustee/committee will be given responsibility for the oversight of all aspects of safety, including whistleblowing and H&SW. This will include:

- Creating a culture of respect, in which everyone feel safe and able to speak up.
- An annual review of safety, with recommendations to the Board.
- Receiving regular reports, to ensure this and related policies are being applied consistently.
- Providing oversight of any lapses in safeguarding.
- And ensuring that any issues are properly investigated and dealt with quickly, fairly and sensitively, and any reporting to the Police/statutory authorities is carried out.
- Leading the organisation in way that makes everyone feels safe and able to speak up.
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of our risk management processes.
- Ensuring that all relevant checks are carried out in recruiting staff and volunteers.
- Planning programmes/activities to take into account potential safeguarding risks, to ensure these are adequately mitigated.
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required.
- Ensuring that a central register is maintained and subject to regular monitoring to ensure that DBS clearances and training are kept up-to-date.
- Ensuring that safeguarding requirements (eg DBS) and responsibilities are reflected in job descriptions, appraisal objectives and personal development plans, as appropriate.
- Listening and engaging, beneficiaries, staff, volunteers and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these.
- Ensuring that personal data is stored and managed in a safe way that is compliant with data protection regulations, including valid consent to use any imagery or video.
- Making staff, volunteers and others aware of:
  - Our safeguarding procedures and their specific safeguarding responsibilities on induction, with regular updates/reminders, as necessary.
  - The signs of potential abuse and how to report these.

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

## **Fundraising**

We will ensure that:

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

## Online Safety

We will identify and manage online risks by ensuring:

- Volunteers, staff and trustees understand how to keep themselves safe online. We may use high privacy settings and password access to meetings to support this.
- The online services we provide are suitable for our users. For example, use age restrictions and offer password protection to help keep people safe.
- The services we use and/or provide are safe and in line with our code of conduct.
- We protect people's personal data and follow data protection legislation.
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, and where consent isn't given media will be taken down on request.
- We clearly explain how users can report online concerns. Concerns may be reported using this policy, or direct to a social media provider using their reporting process. If you are unsure, you can contact one of *these organisations*, who will help you.

## Working With Other Organisations

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

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

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

## **Statutory Guidance**

*[Gov.UK – The role of other agencies in safeguarding](#)*

*[CC: Infographic; 10 actions trustees need to take.](#)*

*[CC: Safeguarding duties of charity trustees](#)*

*[CC: Safeguarding - policies and procedures](#)*

*[CC: How to protect vulnerable groups](#)*

*[CC: Managing online risk.](#)*

## **Useful Links**

*[NCVO: Online safeguarding resources.](#)*

*[NSPCC: Writing a safeguarding policy](#)*

## **Appendix 1 – Signs of Abuse**

### **Physical Abuse.**

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

### **Sexual Abuse.**

- bruises around the breasts or genital area.
- unexplained venereal disease or genital infections.

- unexplained vaginal or anal bleeding.
- torn, stained, or bloody underclothing.
- an individual's report of being sexually assaulted or raped.

### **Mental Mistreatment/Emotional Abuse.**

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

### **Neglect.**

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

### **Self-Neglect.**

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

### **Exploitation.**

- sudden changes in bank account or banking practice, including an unexplained withdrawal of large sums of money.
- adding additional names on bank signature cards.
- unauthorized withdrawal of funds using an ATM card.
- abrupt changes in a will or other financial documents.

- unexplained disappearance of funds or valuable possessions.
- bills unpaid despite the money being available to pay them.
- forging a signature on financial transactions or for the titles of possessions.
- sudden appearance of previously uninvolved relatives claiming rights to a vulnerable adult's possessions.
- unexplained sudden transfer of assets to a family member or someone outside the family.
- providing services that are not necessary.
- individual's report of exploitation.



# Volunteer Recruitment & Selection Policy

Subject to meeting mandatory requirements, all volunteers are welcome. We want our board and volunteers to be both diverse and representative of our community.

This policy details our procedures and will be applied, as appropriate, to help each volunteer find the role which they would most enjoy, and which will enable them to contribute most to our work.

That may range from a substantial time commitment and a requirement for professional qualifications and in-depth experience, to simply a willingness to join in and help out.

## Promotion

Ways in which people can be made aware include promotion:

- Via our websites and social media.
- Physical media including Posters and within our newsletter.
- Through networks of those who come into contact with potential beneficiaries, such as relevant statutory services and charities.

For some groups, we may provide information a different way, such as an additional language, or to make these accessible to people who have disabilities or additional needs.

## Recruitment

All potential volunteers will be interviewed. We follow safer recruitment practices in that we:

- **Inform candidates of our commitment to safeguarding those in our care.**
- **Plan our recruitment timeline to** ensure we have enough time to vet each candidate.
- **Explain that volunteers have to undergo a vetting procedures before appointment.**
- **Carry out pre-employment checks, including** DBS checks, qualification checks, reference checks and identity checks where required
- **Ensure volunteers are appropriately trained or supported for their duties.**

If working in a professional capacity, you must have up-to-date relevant training and undertake refresher training every 2 years or via a recognised CPD programme.

- We encourage all volunteers working with vulnerable people to undertake safeguarding training to Level 1 with the safeguarding lead undertaking safeguarding level 2.
- Everyone working with vulnerable adults or children will be supervised.

## Induction

- Checks and administration, including policies and procedures.
  - Induction into our safeguarding procedures and:
    - If applicable, relevant DBS checks and any safeguarding training required.
  - Relevant identity and right to work checks.
- Welcome and induction into our work, by a team member.
- Welcome and induction and/or on-the-job training for their role, by a team member from that area, including health & safety at work, and relevant procedures.
- Ongoing support and mentoring, and refresher training, as required.

## Selection

### Mandatory Requirements

- A commitment to our work.
- A desire to help and be kind to others.
- Sufficient time/flexibility to be able to carry out the role.
- Where a role specifically requires professional qualifications, experience or accreditation, or other requirement, such as a licence to practice.

Those overseeing activities must undertake any necessary training in order to do so. This may include:

- **First Aid.** Must hold Emergency First Aid at Work (EFAW) and, ideally, First Aid At Work qualification and undertake refresher training as necessary.
- **H&SW.** A minimum of IOSH Working Safely or NEBOSH Safety Simplified and, ideally, IOSH Managing Safely, or similar qualification.
- **Food Handling & Preparation.** If volunteering on an ongoing basis or handling high risk food, we may require you to undergo training.
  - Food handlers - the equivalent to level 2 in food safety and hygiene

- Supervisors and managers - at least level 3 in supervising food safety and hygiene.

We will provide or provide access to any relevant training and refresher training.

## **Desirable Skills and Experience**

- Knowledge of, or experience of working in a charity, or role relating to your volunteering role.
- Relevant professional qualifications or experience.
- Ability to work independently and as part of a team.
- Strong interpersonal and people management skills.
- Good verbal communicator, able to get on well with people and to ask questions positively.

## **Exceptions**

We welcome anyone who wishes to volunteer to help us but there are some circumstances where this may not be possible. For example:

- You must have the right to work / volunteer in the UK and for some visitors to the UK (on visas), asylum seekers and refugees this may not always be the case, or.
- The role you would like may require experience or professional skills you don't have, and for some roles, there may be specific legal requirements that we must meet.
- You have an unspent conviction which makes volunteering unsafe or unlawful.

We should stress that there are only a few occasions when this might apply, and we will always do our best to find a way to welcome you into our charity.

## **Regulatory Guidance**

*Charity Commission:* How to manage your charity's volunteers.

*Fundraising Regulator:* Volunteers.

*Health & Safety Executive:* Volunteering – how to manage the risks.

Gov.UK - *DBS checks: guidance for employers.*