

OUR POLICIES



www.scottyslittlesoldiers.co.uk Registered Charity No. 1136854



INTRODUCTION

WELCOME TO OUR POLICY DOCUMENT

We're on a mission to reduce unnecessary rules and procedures. We trust our people to use good judgement and as a result of this it limits the need for us to dictate exactly how our team members should go about every aspect of their work.

As a team we're also clear about our expectations when it comes to working with us and we communicate this in our Culture Code deck which can be found at **www.** scottyslittlesoldiers.co.uk/culture.

However, as a charity and an employer, we are also legally obliged to have certain policies in place. We also take the safeguarding of the children and young people we come into contact with extremely seriously and as part of our commitment to adhering to best practice in this area we have a number of policies we won't compromise on.

You'll find all of those policies in one place. Here. No hunting around for the latest version. No hiding or making it difficult to find certain policies. Everything we have is here for you to view. The latest version of this document will always be available at **www.scottyslittlesoldiers.co.uk/policies** - forever.

If you spot any errors or any areas we need to improve on please let us know by emailing hello@scottyslittlesoldiers.co.uk.



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MEMBERS POLICIES

Policy documents related to our beneficiaries



Charity Policy: Membership (MP01)

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1. Scope.

1.1. This policy covers the criteria for joining Scotty's Little Soldiers (the charity) as a beneficiary and the procedure for doing so.

2. Purpose.

2.1. To provide relief from the effects of bereavement to young people who have suffered the loss of a parent who served with the Armed Forces of the Crown.

3. Criteria.

3.1. The services of the charity are available to children and young people aged up to 25 who have suffered the death of a parent who served with the British Armed Forces of the Crown.

4. Confirmation Procedure.

- 4.1. An application form is issued to the parent/guardian of potential beneficiaries.
- 4.2. Upon review of the application form and subsequent confirmation that the child/young person meets the required criteria, a series of basic checks are completed to confirm the details provided are correct;
 - 4.2.1. Confirmation of Death in Service or Medical Discharge (one of the following):
 - **4.2.1.1.** Written or email confirmation from MOD Disclosures.
 - 4.2.1.2. Confirmed on UK Roll of Honour.
 - 4.2.2. Guardian Identification (one of following):
 - 4.2.2.1. UK Driving License
 - 4.2.2.2. Recent Utilities Bill
 - 4.2.2.3. Bank Statement
 - **4.2.2.4.** Or Similar official document containing name, current address and recent date.
 - **4.2.3.** Confirmation that the deceased was the legal guardian of the beneficiary:
 - 4.2.3.1. Either one of the following;
 - 4.2.3.1.1. Dependants publicly named by the Ministry of Defence.
 - 4.2.3.1.2. Ministry of Defence Referral.
 - 4.2.3.1.3. Copy of Birth Certificate.
 - 4.2.3.2. Or, three of the following sources;

- **4.2.3.2.1.** Confirmed by third-party charity, for example, the Army Widows Association (Members of Cobseo only).
- 4.2.3.2.2. Confirmed through beneficiary's school/college/regiment.
- 4.2.3.2.3. Participation on a Ministry of Defence event for bereaved families (e.g. FAB Camp).
- 4.2.3.2.4. Recommendation of an existing confirmed beneficiary family.
- 4.2.3.2.5. Named in a credible news source.
- 4.2.3.2.6. Through internet searches and social media posts.

5. Responsibility:

- 5.1. The charity's Families Team is authorised to approve membership on the proviso that the above conditions are met. Any more complicated applications should be communicated to the Trustee board for consideration.
- 5.2. Applications which do not meet the criteria will not be approved. The applicants should be informed why their application has not been approved and offered suggestions for other organisations which may be more suitable to provide support.

6. Review:

6.1. This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2023

1. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Grants Policy General (MP02)

Contents.

- 1. Scope.
- 2. Criteria for Application.
- 3. Procedure for Grant Application.
- 4. Review.

1. Scope.

- 1.1. This policy covers the overall general awarding of grants. All specific grant schemes provided by Scotty's Little Soldiers (the charity) have individual grant policies as listed below;
 - 1.1.1. MP03 Scotty Allowance Grant Policy
 - 1.1.2. MP04 Higher Education Grant Policy
 - 1.1.3. MP05 Scotty's Driving School Grant Policy
 - 1.1.4. MP06 Scotty's Super Grant Policy

2. Criteria for Application:

- 2.1. All grant schemes are only available to beneficiaries who have already been approved through the charity's membership application process (Policy MP01).
- 2.2. All beneficiaries are free to apply for all grants. Some grants have additional criteria based on factors such as age. Some grants are available annually and others are just available once.

3. Procedure for Grant Application:

- 3.1. The procedure for each grant is explained in more detail within each individual grant policy however all grants follow a similar process.
- 3.2. Applications are made by the beneficiary's guardian using online forms accessed via the charity's online families' portal (known as the Members Zone).
- 3.3. Received applications are assessed for suitability by a member of the Families team and then passed to the Head of Families for approval (or the Founder or CEO in the absence of the H of F).
- 3.4. Payment details are sent to Accounts department for payment.
- 3.5. The largest current grant available from the charity is for £1,000.
- 3.6. The largest possible amount payable to one individual in a year would be £2,250 for all 4 grants schemes.

4. Review:

This policy is to be reviewed every 3 years but may be updated by the board of Trustees as required.

(cont.) Next review date: **31st January 2023**

1. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Scotty Allowance Grant Policy (MP03)

Contents.

- 1. Scope.
- 2. Criteria.
- 3. Approval & Application Process.
- 4. Review.
- 1. <u>Scope:</u> Details of the eligibility and activities included for the annual '*Scotty Allowance*' Grant.

2. Criteria:

Eligibility Criteria:	Available to all registered Scotty Members. No age restrictions.					
Maximum Annual Value:	Annual grant of £150.00 per Member.					
Grant can be used for:	To be used to cover or contribute toward the cost of educational activities including but not exclusive to:					
	 School trips Swimming and other sports lessons (by qualified instructors) Music and other art related lessons (by qualified tutors) After school clubs (with managed activities) Health & fitness related (e.g. gym/sports club memberships) Educational courses 					
3. Approval & Application Process.						
Approval of Grants:	Any activities falling outside of the above examples should be agreed by the Trustees before approval.					

Activities falling within the examples provided above can be approved by the Head of Families, the Founder or the Chief Executive.

Multiple applications can be accepted in a single year up to the value of $\pounds150$ in total. Any balance remaining <u>cannot</u> be carried over into the next calendar year.

Application Process: The following process should be followed for new applications;

- 1. Member/Guardian to complete the application form on the Member Zone website and submit to SLS.
- 2. Application to be checked against criteria by a member of the Families team.
- 3. Approval of grant payment by Head of Families (or The Founder or CEO).

- 4. Where possible payment should be made directly to the instructor/organisation. Pre-paid expenses can be refunded upon delivery of satisfactory receipts or bank statements. This will be at the discretion of the Chief Executive and/or Founder.
- 5. Confirmation letter dispatched from Scotty HQ.

4. <u>Review:</u>

Policy renewal date: 31st January 2023.

Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Higher Education Grant Policy (MP04)

Contents.

- 1. Scope.
- 2. Criteria.
- 3. Approval & Application Process.
- 4. Review.
- 1. <u>Scope:</u> Details of the eligibility and activities included for the one-off '*Higher Education*' Grant.

2. Criteria:

Eligibility Criteria: Available to all registered Scotty Members upon reaching the age of 18 and having been accepted to a Higher Education institute.

Maximum Annual Value: One-off grant of up to £1,000 per Member.

Grant can be used for: To be used to cover or contribute toward the cost of activities including but not exclusive to:

- Higher Education tuition fees
- Student accommodation
- Purchase of course related books
- Other equipment directly related to the course enrolled on.

3. Approval & Application Process.

Approval of Grants:	Any activities falling outside of the above examples should be agreed by the Trustees before approval.		
	Activities falling within the examples provided above can be approved by the Head of Families, the Founder or the Chief Executive.		
	This is a single grant which can only be applied for once up to a total of $\pounds1000$.		
Application Process:	The following process should be followed for new applications;		

- 1. Member/Guardian to complete the application form on the Member Zone website and submit to SLS.
- 2. Application to be checked against criteria by a member of the Families team.
- 3. Approval of grant payment by Head of Families (or The Founder or CEO).
- 4. Where possible payment should be made directly to the instructor/organisation. Pre-paid expenses can be refunded upon delivery of satisfactory receipts or bank statements. This will be at the discretion of the Chief Executive and/or Founder.
- 5. Confirmation letter dispatched from Scotty HQ.

4. <u>Review:</u>

Policy renewal date: 31st January 2023. Approved on behalf of the Trustees: Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Driving Lessons Grant Policy (MP05)

Contents.

- 1. Scope.
- 2. Criteria.
- 3. Approval & Application Process.
- 4. Review.
- 1. <u>Scope:</u> Details of the eligibility and activities included for the one-off '*Driving Lessons*' Grant.

2. Criteria:

Eligibility Criteria:	Available to all registered Scotty Members upon reaching the age of 17.	
Maximum Annual Value:	One-off grant of up to £100 per Member.	
Grant can be used for:	To be used to cover or contribute toward the cost of driving lessons at a professionally certified driving school.	
	The choice of driving school and instructor, and the booking of lessons is the responsibility of the family.	

3. Approval & Application Process.

Approval of Grants:All applications can be approved by the Head of Families (or in
their absence - the Founder or the Chief Executive).This is a single grant which can only be applied for once up to
a total of £100.

Application Process: The following process should be followed for new applications;

- 1. Member/Guardian to complete the application form on the Member Zone website and submit to SLS.
- 2. Application to be checked against criteria by a member of the Families team.
- 3. Approval of grant payment by Head of Families (or The Founder or CEO).
- 4. Where possible payment should be made directly to the instructor/driving school. Prepaid expenses can be refunded upon delivery of satisfactory receipts or bank statements. This will be at the discretion of the Chief Executive and/or Founder.
- 5. Confirmation letter dispatched from Scotty HQ.

4. <u>Review:</u>

Policy renewal date: 31st January 2023.

Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Date:

Print Name:

Charity Policy: Super Grant Policy (MP06)

Contents.

- 1. Scope.
- 2. Criteria.
- 3. Approval & Application Process.
- 4. Review.
- 1. <u>Scope:</u> Details of the eligibility and activities included for the one-off '*Super*' Grant.

2. Criteria:

Eligibility Criteria:	Available to all registered Scotty Members. No age restrictions. Can only be applied for once.
Maximum Annual Value:	One-off grant of up to £1,000 per Member.
Grant can be used for:	To be used to cover or contribute towards a significant opportunity, once in a lifetime experience or for an emergency purpose.

3. Approval & Application Process.

Approval of Grants: Only 6 Super Grants are available each year and will be provided on a first come, first served basis.

All Super Grant applications can be approved by the Head of Families (or in their absence - the Founder or the Chief Executive).

This is a single grant which can only be applied for once up to a total of $\pounds1000$.

Application Process: The following process should be followed for new applications;

- 1. Member/Guardian to complete the application form on the Member Zone website and submit to SLS.
- 2. Application to be checked against criteria by a member of the Families team.
- 3. Approval of grant payment by Head of Families (or The Founder or CEO).
- 4. Where possible payment should be made directly to the instructor/organisation. Pre-paid expenses can be refunded upon delivery of satisfactory receipts or bank statements. This will be at the discretion of the Chief Executive and/or Founder.
- 5. Confirmation letter dispatched from Scotty HQ.

4. <u>Review:</u>

Policy renewal date: 31st January 2023.

Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Date:

Print Name:

Charity Policy: Safeguarding Children & Young People Policy (MP07)

1. <u>Scope:</u>

This policy has been agreed by the Trustees of Scotty's Little Soldiers ('the charity') to ensure that every child who comes into contact with our organisation is safe and protected from harm.

This means we will always work to:

- Protect children from maltreatment
- Prevent impairment of children's health or development
- Ensure that children are growing up in circumstances consistent with the provision of safe effective care
- Take action to enable all children to have the best possible outcomes.

This policy will give clear direction to team members, volunteers, visitors and parents about the expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at Scotty's Little Soldiers.

A 'child' is someone under the age of 18 years. Please see our Safeguarding Adults Policy for 18 years and upwards.

2. <u>Definitions:</u>

Support Volunteers include individuals giving their time free of charge to the charity in a role where there is potential contact with a child, for example whilst helping at a beneficiary event.

Fundraising Volunteers, for example a member of the public assisting at a charity bucket collection, are expected to follow the charity's code of conduct, have read and understood our safeguarding policies, completed an application form and taken part in a phone interview with a team member.

A '*child*' is someone under the age of 18 years. Please see our Safeguarding Adults Policy for 18 years and upwards.

3. Introduction:

Scotty's Little Soldiers fully recognises the contribution it can make in protecting children from harm and supporting and promoting the welfare of all children. The charity is solely focused on providing support to children and young people and it is our ambition to set the benchmark when it comes to their safeguarding. Our policy is focused on prevention, protection and support.

We will establish and maintain an ethos where our children feel secure, are encouraged to talk, are listened to and are safe. Children will be able to talk freely to any team member or support volunteer if they are worried or concerned about something.

All team members and support volunteers in contact with children will know how to recognise a disclosure from a child and will know how to manage this. We will not make any promises to any child and we will not keep secrets. Every child will be clear about what the adult they have spoken to will do with whatever information they have been told.

We will provide activities and opportunities that will equip our beneficiaries with the knowledge they need to stay safe. At all times we will work in partnership and try to establish effective working relationships with parents, carers and colleagues from other agencies and organisations.

3. <u>General Procedures:</u>

- When new team members or support volunteers join Scotty's Little Soldiers they will be informed of the safeguarding arrangements in place. They will be given a copy of our safeguarding policies and told who our Designated Child Protection Officer for safeguarding is. They will be shown the recording format, how to complete it and who to pass it on to.
- Every new member of the team or support volunteer will have an onboarding period that will include essential safeguarding information. This programme will include safeguarding training (appropriate to their role) relating to the signs and symptoms of abuse, how to manage a disclosure from a child, how to record this information and issues of confidentiality. The onboarding will also remind team members and support volunteers of their responsibility to safeguard all children and the remit of the Designated Child Protection Officer.
- All team members and support volunteers will be asked to read this policy yearly and after it has been reviewed and updated if necessary.
- All guardians will be asked to confirm they have seen and read our safeguarding policy. They will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.
- Guardians will sign a consent form at the start of their child's membership of Scotty's Little Soldiers, which includes any vital health or otherwise notable information. It also requests permission for images to be used for promotional purposes only.
 - 4. <u>Training.</u>

Every team member will undertake appropriate safeguarding training every three years. The Families team will all complete core safeguarding training and all other team members and support volunteers will complete safeguarding awareness training. The Designated Safeguarding Officer and Deputy Safeguarding officer will complete Designated Safeguarding Officer Training.

We actively encourage all staff to keep up to date with the most recent local and national safeguarding advice and guidance. This can be accessed via <u>www.norfolklscb.org</u>

The Designated Safeguarding Officer should be the first point of contact for concerns and queries regarding any safeguarding concerns in Scotty's Little Soldiers.

5. Safer Team Members & Support Volunteers.

All adults who come into contact with our children or young adults have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with, or on our behalf, with our children are competent, confident and safe to do so.

We ensure that we adhere to the principles of safer recruitment as per our Recruitment Policy and also the guidance from Norfolk Children Safeguarding Children Board.

We will ensure that we:

- Carefully consider the job description and person specification.
- Circulate all vacancies widely.
- Prepare a New Team Member Information pack.
- Require a completed application form for shortlisted candidates including details of any criminal convictions.
- Ask for identification.
- Ask for originals of any relevant qualifications.
- Conduct interviews with at least two people present
- Ask for at least two references, including last employer.
- Gain enhanced DBS checks.
- Organise a comprehensive onboarding period which includes familiarisation with safeguarding policies, procedures and safeguarding training.

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for our beneficiaries. We do recognise that sometimes the behaviour of adults my lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

All adults who come into contact with children will be made aware of the steps that will be taken if an allegation is made. We will seek appropriate advice from the Local Authority Designated Officer (LADO) within 24 hours of an allegation being made. We will then follow up our concerns in writing within a further 24 hours.

Staff will not investigate these matters. We will seek and work with advice that is provided. Should any allegation be made against the Designated Safeguarding Officer or Deputy, this will be reported by the team member or support volunteer raising the concern directly to the LADO.

There are sensible steps every adult should take in their daily professional conduct with children and young adults. This can be found in the NSCB Safer Programme Safer Working Practice.

6. <u>Records & Confidentiality.</u>

If we are concerned about the welfare or safety of any child or young person coming in to contact with Scotty's Little Soldiers we will record our concerns immediately on the agreed report form and give this to the Designated Child Protection Officer.

Any information recorded will be kept securely on our client management system with restricted access. These files will be the responsibility of the Designated Child Protection Officer and the information will only be shared within the organisation on a need to know basis for the protection of the child.

Any safeguarding information will be kept in the file and will be added to. Copies of referrals will be stored in the file.

All information is confidential, however if there is a safeguarding or child protection concern about a child, then information can be shared with other agencies, namely the Police or Children's Services. Reports of a concern to the Designated Child Protection Officer must be in writing and signed and dated by the person with the concern.

7. Roles & Responsibilities.

Scotty's Little Soldiers Designated Child Protection Officer will liaise with the relevant Children's Services and other agencies where necessary and make referrals using the procedure below.

- Any concern for a child's safety or welfare will be recorded and given to the Designated Child Protection Officer who will be responsible for ensuring that all team members and support volunteers are aware of our policy and the procedure they need to follow.
- The Designated Child Protection Officer will ensure that all team members and support volunteers have received appropriate child and young adult protection information during onboarding and have accessed the relevant training.
- The Designated Child Protection Officer will ensure that our safeguarding policies are in place and are reviewed annually. The content of our policies has been written in consultation with the Safer Programme.
- At all times the Designated Child Protection Officer will ensure that safer recruitment practices are followed.
- Scotty's Little Soldiers undertakes to remedy without delay any weaknesses to our safeguarding arrangements that are brought to our attention.
- 8. Procedures for Handling Disclosures

A child may decide to disclose information that may indicate they or another child are suffering from abuse or neglect. A child chooses to speak to an adult because they feel they will listen and that they can trust them. The adult needs to listen to what the child has to say and be very careful not to 'lead' the child or influence in any way what they say.

It is important that the adult remembers to:

- Stay calm
- Listen and be supportive
- Not ask any leading questions, interrogate the child, or put ideas in the child's head, or jump to conclusions
- Not to stop or interrupt a child who is recalling significant events
- Never to promise the child confidentiality it must be explained that the information will be passed on to help keep them safe
- Avoid criticising the alleged perpetrator
- Tell the child what must be done next (the safeguarding process must be followed)
- Record what has been said immediately as close to what has been said as possible. Also record what was happening immediately before the child disclosed. Be sure to sign and date the record in ink
- Contact the designated person immediately
- Seek support

We are clear that the individual's Local Authority and Police must lead any investigation in any allegation regarding safeguarding.

Child protection and safeguarding referrals should be made to the individual's local authority Children's Services following their referral processes.

If Scotty's Little Soldiers are unsure whether to make a referral or not, they will request a professional consultation via the individual's Children's Services contact methods. Any referral, consultation or concern must take place immediately, it is important we do not delay.

9. Working Together 2018.

What is abuse and neglect? A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Physical abuse A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meets the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the illtreatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- a. Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- b. Protect a child from physical and emotional harm or danger;
- c. Ensure adequate supervision (including the use of inadequate care- givers);
- d. Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

8. <u>Review:</u>

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2020

9. Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Scotty Members Code of Conduct

I will:

- Treat everyone how I would like to be treated
- Be helpful and supportive to anyone, if needed
- Be friendly & sociable
- Respect each other including other children, young people and all staff and helpers
- Follow the rules
- Speak to staff and volunteers if I have any worries
- Join in with activities to have FUN!

Name:	 	 	 	
Signed:	 	 	 	
Date:	 	 	 	

FUNDRAISING POLICIES

Policy documents related to fundraising activity



Charity Policy: Fundraising (FP01)

1. <u>Scope:</u>

This policy covers the fundraising activities and events carried out by staff and authorised volunteers of Scotty's Little Soldiers ('the charity').

2. Legislation:

All fundraising activities on behalf of the charity must comply with current legislation and guidance provided by The Charity Commission.

3. Fundraising Activity:

- Any fundraising activity in support of the charity must be first registered (see 4: Registration of Fundraising Activity).
- Any communications to the public must be truthful and non-deceptive.
- Where 100% of the funds raised are not to be directly received by the charity this must be clearly stated and in-line with current legislation.
- All personal information obtained is confidential and not to be sold or passed on to third parties.
- Nobody directly or indirectly employed or volunteering whilst fundraising on behalf of the charity shall receive any personal commissions, bonuses or payments.
- Fundraising contributions will only be accepted from companies, organisations and individuals the management team and Trustee board deemed to be of an ethical nature.

4. <u>Registration of Fundraising Activity:</u>

All fundraising activity in support of the charity should be registered via the online registration form or with a member of the fundraising team using the charity's registration system.

Once approved, fundraisers are then provided with a letter of fundraising authenticity, which includes a unique fundraising registration number and an expiry date, and a copy of the charity's Fundraising Guide.

Anyone fundraising without the approval of the charity will be deemed to be acting independently of the charity. Approved Fundraisers are permitted to use the charity's *'In Support of'* logo and not the official charity logo.

Funds raised for the charity must be transferred in a timely manner and in line with the charity's Cash Handling Policy (FCxx).

All donors and fundraisers are recorded on the charity's system and amounts raised are logged. A thank you letter/certificate is issued unless the donor has specified not to receive one.

5. <u>Unauthorised Activity:</u>

- The charity does not endorse the use of sky lanterns or balloon releases.
- The charity does not engage in door-to-door house collections or telephone fundraising.

FP01 Fundraising Policy

- The charity does not endorse or approve any activity which may be deemed unsuitable when fundraising for a children's charity.
- The charity will report to the authorities any fundraising activity which is said to be in support of the charity but for which no funds are received.
 - 6. <u>Complaints procedure:</u>

The charity has a formal complaints policy and procedure (PP03).

Any complaints relating to fundraising activities should be sent in writing to Scotty's Little Soldiers, Complaints, Unit 21 Bergen Way, King's Lynn Norfolk PE30 2JG.

7. <u>Review:</u>

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2018

8. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

FINANCIAL CONTROLS

Finance related policy documents



Charity Policy: Financial Controls Policy (FC01)

Contents.

- 1. Key Issues, Monitoring and Fraud.
- 2. Income.
- 3. Purchases and Payments.
- 4. Assets & Investments.
- 5. Review.

1. Key Issues, Monitoring and Fraud.

- 1.1. Financial Controls throughout the charity.
 - 1.1.1. The Trustees review this Financial Controls Policy on an annual basis.
 - 1.1.2. Third-party experts are consulted on an annual basis (for example external Accountants and/or organisations such as the NCVO).
 - 1.1.3. A segregation system exists within the charity. No one Member of staff has sole responsibility for a single transaction from placing the order through to completion and review.
 - 1.1.4. Line Managers must approve all purchase requisitions prior to orders being placed.
 - 1.1.5. All individual transactions, invoices and receipts are processed and reviewed by the internal Finance Team.
 - 1.1.6. All payments must be made by a different individual to the team member who submitted the requisition or purchase order.
 - 1.1.7. Monthly bank reconciling is carried out by a different team member to those responsible for processing payments on the charity's Sage accounting system.
 - 1.1.8. In most cases there are 2-3 team members involved in each transaction.
 - 1.1.9. Monthly financial reports are reviewed by the Trustees who will question transactions at random.
 - 1.1.10. Annual financial reports are audited by third-party independent accountants who have full access to the charity's Sage accounting system and paper work.

1.2. Monitoring Activities.

- 1.2.1. Income and expenditure budgets are prepared by the Senior Management Team (SMT) and submitted for approval by the Trustees annually.
- 1.2.2. Budgets are checked against actual performance using a Monthly Performance Report by the Trustees and discussed during monthly conference calls with the SMT.
- 1.2.3. Any major variance to the budget must be highlighted by the SMT to the Trustees each month for review.
- 1.3. Internal Audit & Audit Committee.
 - 1.3.1. Currently the Trustee board is too small in numbers to have a separate Audit Committee so this responsibility falls upon the main board.
 - 1.3.2. The Trustees review the financial controls on an annual basis and consult with at least one third-party organisation each year.

- 1.3.3. Financial Performance Reports are reviewed by the Trustees on a monthly basis.
- 1.4. Information & Communications.
 - 1.4.1. The Trustee board receives monthly Financial Performance reports from the SMT. These reports include;
 - 1.4.1.1. Monthly performance vs budget for expenditure and income.
 - 1.4.1.2. Monthly year on year performance review.
 - 1.4.1.3. Performance broken down by nominal accounting code.
 - 1.4.1.4. Year to date performance vs budget and previous year.
 - 1.4.2. The Trustee board consults with the SMT monthly through conference calls or other electronic channels, whereby the Financial Performance can be discussed.
 - 1.4.3. The Trustees meet quarterly and a review of the Financial Performance is a set part of the agenda.
 - 1.4.4. The Trustees have not formed a sub-committee at this time due to the small size of the charity and its board.
- 1.5. Trustees' Responsibilities.
 - 1.5.1. Every transaction is recorded using the Sage accounting system and the charity's own Salesforce CRM system records are checked to ensure they match every month.
 - 1.5.2. The Sage accounting system is then reconciled with bank statements every month to ensure they match.
 - 1.5.3. Paper copies of all receipts and invoices are kept on file with access available to the Trustees on demand and provided to third-party accountants/auditors each year for review.
 - 1.5.4. The Trustees have set a reserve policy for the charity which is reviewed annually. Please refer to *FCO2 Reserves Policy* for further details.
 - 1.5.5. The charity's accounts are prepared annually by an independent, third-party accountancy and meet the statutory requirements.
 - 1.5.6. The annual accounts are reviewed by the Trustees individually and then approved at the charity's AGM.
 - 1.5.7. The Trustees have appointed Mapus-Smith & Lemmon as third-party independent auditors who prepare the charity's annual report and conduct an independent audit each year regardless of income thresholds.
 - 1.5.8. As part of the *Trustee Recruitment Process* all potential new Trustees are provided with a copy of the charity's annual report.
 - 1.5.9. The Trustees file the Annual Report and Return online with the Charity Commission within the specified timescales (by October).
- 1.6. Managing Risks of Financial Crime and Abuse.
 - 1.6.1. Examples of fraudulent activity, often originally shared with the charity by third-party organisations such as the Charity Commission or Third Sector media, are shared between the SMT, Team Members and the Trustee board on a regular basis as is appropriate. The charity uses the *Microsoft Teams* collaborative sharing platform to communicate such activity with team members.

- 1.6.2. Anti-bribery, hospitality, acceptance of donations and a register of interests are all included in the charity's *Conflicts of Interests Policy (PPO2)*.
- 1.6.3. The charity's *Data Protection Policy (PP01)* includes details covering electronic storage of data.
- 1.6.4. The charity primarily makes use of a number of third-party cloud based IT solutions to store data. These third parties are selected based on conforming to the highest standard of data security. The main providers of these solutions are globally recognised organisations such as *Salesforce, Microsoft, PayZone* and *Mail Chimp*.
- 1.6.5. Should a member of the team suspect any financial crime or abuse they are required to submit details immediately to the SMT and Trustees for review. The charity has a Whistleblowing Policy and direct lines of communication to the Trustee board should any members of staff feel uncomfortable reporting to the SMT. Following the discovery of any potential criminal activity the Trustees will report immediately to the police, the charity's bankers and the Charity Commission.

2. Income.

- 2.1. Income received in the post.
 - 2.1.1. All post received is opened in the main office area in the presence of at least two team members.
 - 2.1.2. Post is opened as soon as possible upon receipt with all items date stamped.
 - 2.1.3. Unopened post is stored in the charity safe until it can be opened in adherence with point 2.1.1.
 - 2.1.4. All incoming donations (whether cash, cheque or otherwise) are recorded immediately on the charity's Salesforce CRM system.
- 2.2. Income from public collections and fundraising events.
 - 2.2.1. The charity relies heavily on the public organising 'in support of' fundraising activities, where the charity does participate in its own fundraising events or collections;
 - 2.2.1.1. All events and collections must adhere to legal requirements (team members and volunteers are also briefed on the charity's 'Code of Conduct').
 - 2.2.1.2. Collection pots are numbered with locations and amounts collected recorded on the charity's Salesforce CRM system.
 - 2.2.1.3. All collection pots and buckets are sealed before issue.
 - 2.2.1.4. Returning collection pots and buckets are stored in the charity safe and opened as soon as possible. Monies collected are either counted in the presence of at least two team members, or taken to the bank (HSBC) and counted using the bank's electronic counting equipment which deposits the funds directly into the charity's account. Amounts received are logged on the charity's Salesforce CRM system.
 - 2.2.1.5. Collectors returning collection pots or buckets are welcome to be present during counting and to be issued with a receipt. In addition, all individuals or groups fundraising for the charity are issued with a certificate stating the amount raised.

- 2.2.1.6. Cash valued under £500 can be kept in the charity's safe and banked within 2 working days. Cash over £500 is banked as soon as possible and within 24 working hours.
- 2.2.1.7. Cash is banked without the deduction of expenses. Expenses can be claimed in line with the charity's separate expenses process (*FC04 Expenses Policy*).
- 2.2.1.8. Records of every fundraising event or donation made to the charity are kept using the cloud based Salesforce CRM system which can be accessed securely by all approved team members using charity issued hardware only.
- 2.3. Gift Aid Declarations.
 - 2.3.1. The majority of the charity's Gift Aid is collected on its behalf by third party organisations such as CAF, Virgin Money Giving and JustGiving.
 - 2.3.2. Other 'non-electronic' eligible Gift Aid donations are submitted to HMRC on a quarterly basis complete with relevant paperwork usually sponsorship forms with names, addresses and confirmation that gift aid can be collected.
- 2.4. Legacies.
 - 2.4.1. The charity has not to date proactively pursued legacy donations and has not received any substantial legacy donations.
 - 2.4.2. Any legacy donations received would be highlighted as such when entered onto the charity's Salesforce CRM system. There is a legacy nominal code to highlight any such donations in the Sage accounting system and a line for legacy donations exists in the monthly Financial Performance Reports prepared by the SMT.
- 2.5. Tainted Charity Donations & Substantial Donors.
 - 2.5.1. The charity keeps detailed records of all substantial donations made.
 - 2.5.2. In accordance with the Finance Act 2011 any potentially tainted donations must be highlighted to the Trustees for immediate review.
 - 2.5.3. If the Trustees are concerned that a substantial donation may be tainted they will seek third party advice from a specialist or from HMRC directly.
- 2.6. Trading Income.
 - 2.6.1. The charity operates a Trading subsidiary for all commercial activity.
 - 2.6.2. The Trading subsidiary is subject to the same financial controls and processes as the charity. All invoices, receipts and payments are entered on to Sage in the same way as the charity. All sales transactions are also entered onto the charity's Salesforce CRM system. The same monthly reporting, reconciling of bank statements and annual reporting/auditing processes apply. The independent, third-party accountancy firm Mapus-Smith and Lemmon also prepare and audit the Trading annual returns and reports.
 - 2.6.3. The charity's standard payment terms are 30 days from invoice however most sales transactions are paid for instantly either at events or via the charity's online store.

- 2.6.4. Stock is controlled automatically using the charity's Salesforce CRM system. An annual physical stock check takes place at the close of the financial year as well as ad hoc checks throughout the year to ensure system levels are correct.
- 2.6.5. Monthly Financial Reports are reviewed by the Trustees and discussed with the SMT during conference calls/meetings/email communications. The performance of the trading subsidiary is reviewed as an ever-present agenda item at each Trustee meeting and financial reports are approved at the AGM.
- 2.7. Banking and Custody Procedures.
 - 2.7.1. All donations received (Cash, Cheques, Online, etc.) are recorded on the Salesforce CRM system as soon as possible.
 - 2.7.2. Cheques and cash of less than £500 is stored in the charity's safe until the next banking run which occurs twice weekly.
 - 2.7.3. If cash on site exceeds £500, banking is carried out as soon as possible (usually the same day depending on the necessary staff numbers available).
 - 2.7.4. Funds are banked gross. Any expenses owed need to be claimed via the charity's Expenses process (see FC04 Expenses Policy).
 - 2.7.5. Cash in the charity's safe is covered by the charity's insurance policy.
 - 2.7.6. Banking is recorded on the charity's Sage accounting program and reconciled with bank statements at the end of each month.
- 2.8. Checks on Income Records.
 - 2.8.1. Amounts recorded on the charity's internal systems (Sage Accounting and Salesforce CRM) are reconciled on a monthly basis with bank accounts. This process also includes checking;
 - 2.8.1.1. cheque stubs against recorded amounts
 - 2.8.1.2. paying-in slips agree with bank statements
 - 2.8.1.3. verifying & confirming any direct debits or online transfers

3. Purchases, Payments and Loans.

- 3.1. Controls and authorisation of expenditure on goods and services.
 - 3.1.1. All purchases made require Purchase Order approval by a Line Manager.
 - 3.1.2. The SMT can approve payments up to £5,000 in line with expenditure planned in the approved charity budget. Income and Expenditure is monitored against budget on a monthly basis by the Trustees.
 - 3.1.3. A budget is prepared annually by the SMT and approved by the Trustee board. Any additional expenditure or overspend needs to be agreed by the Trustee board before placing orders.
 - 3.1.4. The Finance team check all invoices and receipts against orders/quotes etc.
 - 3.1.5. A PO is submitted by the team member to their line manager for approval. Following approval, the order is raised and the invoice is presented to the Finance team for processing. When payment is required, receipt of goods is confirmed and the payment details are passed by Finance to the SMT for payment (a twice weekly process). This means in most cases 2-3 people are involved in the process.
- 3.2. Controls and authorisation of expenditure on grants.

- 3.2.1. The charity has a structured grant making policy. Each small grant scheme has a maximum amount, currently ranging from £100 to £1,000 depending on the scheme.
- 3.2.2. Grants are only available to existing beneficiaries of the charity. These beneficiaries undergo identity and status checks upon joining the charity which include the submission of birth certificates and confirmation from the Ministry of Defence if eligibility.
- 3.2.3. Applications for grants are submitted online & approved by the charity's 'Members (beneficiaries) Team' in line with each schemes criteria. Following approval, payment details are submitted to the Finance team for processing. Payments are then made by the SMT as part of the normal twice weekly payment process.
- 3.2.4. In most cases payments are made directly to the provider of the activity, for example the school offering the extra-curricular activity, and authenticity checks are carried out prior to payment. Payments may be made to the beneficiary themselves upon submission of acceptable invoices/receipts from the provider (this is sometimes the case when the charity is providing just part of the activity payment).
- 3.2.5. The grant application process is managed and monitored using the cloud based Salesforce CRM system which can be reviewed at any time by the SMT or Members Team.
- 3.2.6. Grant payments are then subject to the normal monthly financial checks, for example; reconciling Sage and Salesforce records against bank statements.
- 3.3. Payment by cheque.
 - 3.3.1. Any payments to be made by cheque are required to go through the same Purchase Order process as other payments (described in 3.1 Controls and Authorisation of Expenditure on Goods and Services)
 - 3.3.2. Payments are approved by line managers, passed to Finance for processing and cheque preparation, and then finally signed by a member of the SMT.
 - 3.3.3. Cheque stubs are checked against invoices/receipts and bank statements as part of the reconciliation process. Cheque numbers are recorded on the Sage Accounting system.
 - 3.3.4. No blank cheques are ever to be issued/signed on behalf of the charity.

3.4. Payment by direct debit or debit card.

- 3.4.1. Only the SMT or Trustees are authorised to set up direct debits on behalf of the charity.
- 3.4.2. The process follows the same payment process for expenditure on goods and services (see 3.1). Details are processed by the Finance team following Line Manager approval and the direct debit is set up by the SMT. These payments are then checked monthly as part of the reconciliation process.
- 3.4.3. The charity has two debits cards the responsibility for these cards is held by the SMT. Receipts for payments made using the cards are provided to the Finance team for checking during the monthly reconciliation process.
- 3.4.4. Copies of all bank statements detailing card payments are sent each month directly to the Finance team.

- 3.4.5. The Finance team should highlight any potential misuse to the Trustees for further investigation.
- 3.4.6. There are no specific restrictions on where the cards can be used but their use must solely be for the benefit of the charity.
- 3.5. Payments made by Cash.
 - 3.5.1. It is extremely rare that any cash payments are made by the charity.
 - 3.5.2. In the event of doing so, cash should be taken from the petty cash which is securely locked in the charity safe.
 - 3.5.3. The cash should be issued by a member of staff not involved in the transaction the cash is required for and details should be entered in the petty cash book.
 - 3.5.4. All payment details and receipts should be passed to the Finance team for entering onto the Sage accounting system which will be double checked against the bank statements as part of the monthly reconciliation process.
- 3.6. Wages and Salaries.
 - 3.6.1. Wages and salaries are paid monthly by the charity.
 - 3.6.2. These are prepared by independent accountancy firm Mapus-Smith and Lemmon (and follow all statutory requirements including living wage and National Insurance Contributions.) and then paid by the SMT using online banking.
 - 3.6.3. Pay slips are prepared by Mapus-Smith and Lemmon and issued to each staff member.
 - 3.6.4. The Trustees review salaries on an annual basis, often conducting industry benchmarking to ensure best practice when setting or changing salaries.
 - 3.6.5. Potential changes to salaries or new recruits are presented to the Trustees by the SMT for approval. This is discussed by the Trustees and feedback provided to the SMT via written email.
 - 3.6.6. All employees have a contract of employment and have access to a NEST pension scheme.
 - 3.6.7. Personnel records are kept by the SMT separately from wage records.

3.7. Payment of expenses.

- 3.7.1. Expenses are paid in line with the policy: *FC04 Expenses Policy*.
- 3.8. <u>Loans.</u>
 - 3.8.1. The charity does not hold any loans and does not intend on entering into any such agreements in the near future.
 - 3.8.2. The charity does have leases for office space and vehicles which are initially negotiated by the SMT and then approved by the Trustees. The Trustees finalise and sign the agreements on behalf of the charity. Payment details are then submitted to the Finance team.
- 3.9. Checks on expenditure records.
 - 3.9.1. A monthly reconciliation process takes place by a member of the team not associated with the original transaction payment.

3.9.2. This process includes matching bank statements to entries on the Sage Accounting system and the charity's Salesforce CRM platform. Every transaction also includes a paper reference which will include invoices, receipts, cheque numbers for checking against stubs and any other relevant information.

4. Assets and Investments.

- 4.1. Controls over fixed assets.
 - 4.1.1. A register of assets is updated and presented to independent third-party accounts at the end of each year for review.
 - 4.1.2. These assets are checked every 6 months to ensure that they remain in good order. Any unexpected changes to their order or value should be reported to the Trustees.
 - 4.1.3. The disposal of any significant fixed assets should be approved by the Trustees prior to this happening.
 - 4.1.4. Insurance covering all fixed assets is reviewed annually unless any significant changes are introduced in which case the charity's insurers are informed.
 - 4.1.5. The charity does not currently own any land. If this changes the Trustees will ensure it is appropriately registered with the Land Registry and that Title Deeds are held securely.

4.2. Investments.

- 4.2.1. The charity does not currently hold any investments but is considering this in the future.
- 4.2.2. The Trustees will update this policy should the charity decide to invest in the future.
- 4.3. Money held as a current asset.
 - 4.3.1. Bank reconciliation takes place on a monthly basis.
 - 4.3.2. This process includes all income and expenditure including direct debits, bank transfers and card payments.
 - 4.3.3. The charity bank accounts are kept solely for the use of the charity and not for personal transfers. Complete records of all transactions are kept and shared with independent third-party accountancy firm Mapus-Smith and Lemmon.
 - 4.3.4. The charity holds two accounts (Charity and Trading). Both accounts are audited by Mapus-Smith and Lemmon and both accounts are run using the Sage Accounting program.
 - 4.3.5. Any new accounts require the authorisation of the complete Trustee board in order for them to be opened.
 - 4.3.6. Third parties are not permitted to open bank accounts using the charity's name.
 - 4.3.7. The costs and benefits of the charity's existing bank accounts are reviewed biannually by the SMT and Trustees.
- 4.4. Electronic banking.
 - 4.4.1. Payments made by e-banking follow the same authorisation and reconciliation process as all other transactions made by the charity.

- 4.4.2. A print out of all electronic transactions is made and included with the paper records maintained by the Finance team.
- 4.4.3. E-banking requires two passwords to be enter the system. A code is then required to be entered into a separate device which generates a unique number to be entered online to access the account. Two members of the SMT have access to this device (which is kept securely in the office) and the passwords.
- 4.4.4. The computers using e-banking are kept up to date with the latest security software and are password protected themselves.

4.5. Non-traditional banking.

- 4.5.1. The charity does not use any non-traditional banking methods.
- 4.6. Restricted funds and endowment funds.
 - 4.7. The charity does not hold any endowment funds. The Trustees will review related policies should this situation change.
 - 4.8. Restricted Funds are marked as such on the Sage Accounting system and a separate budget spreadsheet for each project is kept to track spending against restricted funds.

5. Review:

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2019

Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Reserves Policy (FC02)

Contents.

- 1. Introduction.
- 2. Current Reserves Target.
- 3. Monitoring & Reviewing.

1. Introduction.

- 1.1. This Reserves Policy shows the Trustees decision around how much funds should be held in reserve by the charity.
- 1.2. The Trustees have made this decision based on detailed understanding of the annual running costs of the charity and future planned projects.
- **1.3.** It is the ambition of the Trustees to hold just enough cash in reserve to call upon should the charity experience a short-term downturn in fundraising activity.

2. Current Reserves Target.

- 2.1. The Trustees have set an upper target limit of 9 months of cash reserves based on the agreed annual core expenditure budget of the charity.
- 2.2. For 2019 this upper limit is approximately **£487,5000 of cash reserve**.
- 2.3. The Trustees have set a lower target limit of 6 months of cash reserves based on the agreed annual core expenditure budget of the charity.
- 2.4. For 2019 this lower limit is approximately **£325,000 of cash reserve**.
- 2.5. These figures represent the Trustees ideal targets and if the charity's cash reserves begin to consistently fall outside this range on a monthly basis, the Trustees and SMT will review the current financial situation and decide on a future action plan which could result in either more proactive fundraising activity or scaling back on planned charitable activities.

3. Monitoring & Review.

- 3.1. The Trustees are presented with a monthly Financial Performance Report which includes the end of month cash balance held by the charity. This provides them with a monthly picture of the charity's cash in hand and the opportunity to raise any potential concerns with the SMT.
- 3.2. The Trustee board meet with the SMT on a quarterly basis, providing an opportunity to discuss the cash reserves levels for that quarter.
- 3.3. This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2019

<u>(cont...)</u>

Approved on behalf of the Trustees:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Fraud Prevention Policy (FC03)

Contents.

- 1. General Fraud Prevention Policy.
- 2. Reporting Fraud & Other Serious Incidents.
- 3. External Fundraising Events.
- 4. Charity Commission Checklist.
- 5. Review.

1. Fraud Prevention Policy.

1.1. Introduction.

- 1.1.1. This document sets out the policy and procedures of Scotty's Little Soldiers (SLS) against fraud and other forms of dishonesty.
- 1.1.2. It applies to Directors, staff and volunteers. Anybody associated with SLS who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

1.2. Statement of intent.

- 1.2.1. SLS will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.
- 1.2.2. All team members of SLS have a responsibility for putting these principles into practice and for reporting any breaches they discover.
- 1.3. Definitions.
 - 1.3.1. *Fraud*: A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either; a member of the public, someone who works or is a volunteer for SLS. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud.
 - 1.3.2. *Theft*: Dishonestly acquiring, using or disposing of physical or intellectual property belonging to SLS or to individual members of the organisation.
 - 1.3.3. *Misuse of equipment*: Deliberately misusing materials or equipment belonging to SLS for financial or material benefit.
 - 1.3.4. *Abuse of position*: Exploiting a position of trust within the organisation for financial or material benefit.
- 1.4. <u>Culture.</u>
 - 1.4.1. SLS fosters honesty and integrity in its entire staff. Directors, staff and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Charity.
 - 1.4.2. As part of this, SLS will provide clear routes by which concerns may be raised by Directors, staff and volunteers. Details of this can be found in the SLS Staff Handbook.

- 1.4.3. Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice
- 1.5. <u>Responsibilities.</u> In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

1.5.1. Trustee and Non-Executive Directors:

- 1.5.1.1. The Directors are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Charity's policies, aims and objectives.
- 1.5.1.2. The system of internal control is designed to respond to and manage the whole range of risks which the Charity faces.
- 1.5.1.3. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks.

1.5.2. The Chief Executive Officer (CEO):

- 1.5.2.1. Overall responsibility for managing the risk of fraud has been delegated to the CEO. The day to day responsibility has been delegated to the CFO to act on behalf of the CEO.
- 1.5.2.2. Their responsibilities include:
 - 1.5.2.2.1. Undertaking a regular review of the fraud risks associated with each of the key organisational objectives.
 - 1.5.2.2.2. Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
 - 1.5.2.2.3. The design of an effective control environment to prevent fraud.
 - 1.5.2.2.4. Establishing appropriate mechanisms for:
 - 1.5.2.2.4.1. reporting fraud risk issues
 - 1.5.2.2.4.2. reporting significant incidents of fraud or attempted fraud to the Board of Director Directors;
 - 1.5.2.2.5. Liaising with the Charity's appointed Auditors.
 - 1.5.2.2.6. Making sure that all staff are aware of the Charity's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud;
 - 1.5.2.2.7. Ensuring that appropriate anti-fraud training is made available to Directors, staff and volunteers as required; and
 - 1.5.2.2.8. Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.
- 1.5.3. *Senior Management Team:* The Senior Management Team is responsible for:
 - 1.5.3.1. Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
 - 1.5.3.2. Preventing and detecting fraud as far as possible;
 - 1.5.3.3. Assessing the types of risk involved in the operations for which they are responsible;

- 1.5.3.4. Reviewing the control systems for which they are responsible regularly;
- 1.5.3.5. Ensuring that controls are being complied with and their systems continue to operate effectively;
- 1.5.3.6. Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.
- 1.5.4. *Staff:* Every member of staff is responsible for:
 - 1.5.4.1. Acting with propriety in the use of Charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
 - 1.5.4.2. Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
 - 1.5.4.3. Being alert to the possibility that unusual events or transactions could be indicators of fraud;
 - 1.5.4.4. Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
 - 1.5.4.5. Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
 - 1.5.4.6. Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.
- 1.5.5. *Volunteers.* Every volunteer is responsible for:
 - 1.5.5.1. Acting with propriety in the use of the Charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
 - 1.5.5.2. Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
 - 1.5.5.3. Being alert to the possibility that unusual events or transactions could be indicators of fraud;
 - 1.5.5.4. Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
 - 1.5.5.5. Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
 - 1.5.5.6. Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.
- 1.6. <u>Review</u>
 - 1.6.1. This policy will be reviewed every 3 years or amended as required.

2. Reporting Fraud & Other Serious Incidents.

- 2.1. Full details of reporting fraud or suspected fraud can be found in the Charity's Crisis Management Policy (FC05).
- 2.2. Upon discovery of any possible fraudulent activity the SMT and Trustees should be notified immediately.
- 2.3. The SMT & Trustees will then establish whether the incident needs to be reported to the Police via Action Fraud at actionfraud.police.uk.
- 2.4. A full checklist can be found in point 4.

3. External Fundraising Events.

- 3.1. Many fundraising events are held by members of the public 'in support of' the charity. For full details of the charity's fundraising activity see the Fundraising Policy (FP01).
- 3.2. All third parties fundraising 'in support of' the charity are asked to register their activity with the charity. Following approval, they will be issued with a unique ESLS reference code and a letter of authenticity.
- 3.3. All fundraisers are required to have this letter of authenticity with them when fundraising in support of the charity. All letters feature an expiry date.
- 3.4. All members of the charity team have access to the charity's CRM system and are able to check the legitimacy of any fundraising activity, ensuring it has been registered with us.
- 3.5. Ideally fundraisers are asked to raise money using established online providers such as JustGiving or Virgin Money Giving. Full details of how to safely fundraise are provided in our Fundraising guides and Fundraising Policy.

4. Charity Commission Check List

4.1. See following page.



Fraud and theft information checklist

When you report an incident consider the following

If it's a fraud, do you know what type of fraud it is?

If it's a theft, what was stolen?

What is the estimated value of the loss?

When did the charity first become aware of it?

How was it discovered – via the charity's own internal controls, its auditors or professional advisers, or perhaps via the bank?

What happened and over what time period? Try to summarise the circumstances of the incident without omitting key detail

Were your charity's internal policies and procedures followed?

Have you taken appropriate action to deal with the incident – has a report been made to Action Fraud or the Police (if theft) and a crime reference number been obtained?

Have you recovered, or are trying to recover, the lost funds?

Are you pursuing or considering civil recovery of the funds?

Are your charity's losses covered by insurance?

Is the suspect involved in the charity as a trustee, employee or volunteer?

Is the suspect in a senior position (for example Chair, Chief Executive or Director?)

Is the suspect responsible for safeguarding the finances (for example Treasurer or Finance Director)?

Is this an isolated incident or have a series of connected incidents occurred over a period of time?

Are the funds lost from a public appeal, collection or from grant funding – if so, can the activity still go ahead?

Are there signs of public interest or significant media attention – do you have agreed 'lines' or a media plan ready?

Will you need to take action against an individual (for example disciplinary procedures or suspension)?

Do you know if the accused is involved with any other charities?

Have lessons been learned and will you review your internal financial controls and procedures as a result?

5. Review:

This policy is to be reviewed at least every 3 years but may be updated by the board of Trustees as required.

Next review date: 31st January 2019

Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Expenses Policy (FC04)

Contents.

- 1. Introduction.
- 2. Business Travel.
- 3. Reclaiming Expenses.
- 4. Review.

1. Introduction.

- 1.1. The following list of expenses is not intended to be exhaustive, but seeks to give guidance on what constitutes an expense.
- 1.2. The overriding principle of the expense policy of the charity is to reimburse employees for actual, reasonable and necessary travel and business expenses incurred in the fulfilment of the charity's business.
- 1.3. If you are in any doubt as to whether something constitutes an expense, your line manager must be consulted before incurring the expense. Failure to do so may result in the expense not being reimbursed.
- 1.4. In cases where the expense policy is not complied with, expenses will not be reimbursed. Cases of expense abuse will be treated seriously. Proven cases of expense fraud will be treated as gross misconduct with serious consequences for any employees implicated and will be dealt with within the charity Disciplinary Procedure as well as involving the Police if appropriate.

2. Business Travel

- 2.1. Employee travel may take the form of train, air travel, tube/bus, taxi and car travel (to include Charity cars, own cars, car rental and parking expenses):
- 2.2. Train Employees should travel standard class when travelling on the charity's business.
- 2.3. Air All flights must be approved by the Chief Executive or Chairman of the Trustees
- 2.4. **Taxis** Taxis should only be used where no other form of transport is available, and then only for short journeys. Travel in London should always be via tube or bus where possible
- 2.5. **Car** We have to set a rate that is fair to the employee which also falls within HM Revenue and Customs approved rates so that there is no further tax liability on the employee.
- 2.6. There are two mileage rates one for employees who use their own car for business purposes and the other for employees who use a Charity vehicle.
- 2.7. Please see the current Expense Claim form located on SharePoint for the mileage claim rates. Mileage claim rates are calculated in line with HMRC recommended levels.
- 2.8. That mileage rates are NOT claimable for travel between an employee's house and their normal place of work (unless your contract states that you work from home). If travelling to or from a station/other location, the allowable business mileage is the mileage incurred less your usual mileage to your permanent place of work, unless you are required to stay overnight, in which case the full mileage may be reimbursed.

- 2.9. You should clearly show on your expenses form any deductions for your usual daily mileage. Records for the total number of business miles claimed will have to be kept for any employees using a private or Charity car for business purposes.
- 2.10. **Parking** when incurred, as a business expense should be recharged in the normal way. In the UK there are two types of parking, on and off street. On street parking is not VAT chargeable, off street parking is VAT chargeable, the two must be recorded separately on the expense claim form and submitted with the appropriate receipt/ticket.

3. Reclaiming expenses

- 3.1. In order to reclaim expenses, an Expense Claim Form will need to be completed. This is available to download via the Team Site on Sharepoint. Expenses must be submitted to the SMT for approval and are then passed to the Finance Team for processing.
- 3.2. Members of the SMT should seek approval from a nominated Trustee (in line with the charity's conflict of interest policy).
- 3.3. All expenses should be reclaimed within 30 days of the month end and will be rejected if older than 90 days.

4. **Review:**

4.1. This policy is to be reviewed every 3 years but may be updated by the board of Trustees as required.

Next review date: 31st January 2019

Approved on	behalf of the	Trustees:
<u>Approved on</u>	benun or the	musices.

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Crisis Management & Serious Incident Policy (FC05)

Contents.

- 1. Introduction.
- 2. Responsibilities.
- 3. When, What & How.
- 4. Charity Commission Deciding What to Report.
- 5. Crisis Management Communication Plan.

1. Introduction

- 1.1. Introduction
 - 1.1.1. The charity has a responsibility to report any serious incidents to the Charity Commission, stakeholders and potential the authorities.
 - 1.1.2. This policy explains what incidents should be reports, by whom and to which organisations.
 - 1.1.3. The policy also includes a Crisis Management Communications plan in the event of a major incident.

1.2. What is a serious incident?

- 1.2.1. Harm to beneficiaries, staff, volunteers or others connected to the charity's work.
- 1.2.2. Loss of money or assets (typically valued at £25,000 or more).
- 1.2.3. Damage to property.
- 1.2.4. Harm to reputation or the charity's work.

2. Responsibilities.

- 2.1. The Trustees hold overall accountability for any serious incidents but delegate initial responsibility to the SMT.
- 2.2. In the event of a serious incident the SMT will inform the Trustee board and the decision will be made as to who reports the matter further.
- 2.3. Staff have a responsibility to inform the SMT of any potential incident (as described in point 1.2).

3. When, What & How.

- 3.1. <u>When?</u>
 - 3.1.1. Upon initial discovery of a possible serious incident the SMT should be informed immediately.
 - 3.1.2. The SMT will determine whether the incident is serious in line with this policy and inform the Trustee Board.
 - 3.1.3. A decision will then be made whether to inform the Charity Commission. This action should take place as a matter of urgency.

3.2. <u>What?</u>

- 3.2.1. Section 4 of this policy provides advice from the Charity Commission on what should be reported further and what can be dealt with in-house without the need for reporting further.
- 3.2.2. Any suspicious or unverified donations exceeding £25,000 should be highlighted to the Charity Commission.

3.3. <u>How?</u>

- 3.3.1. If a serious incident needs reporting to the Charity Commission the following information will be required and should be emailed to <u>rsi@charitycommission.gsi.gov.uk</u>;
 - 3.3.1.1. who you are and your connection to the charity
 - 3.3.1.2. the authority you have to report on behalf of the charity's trustees
 - 3.3.1.3. who in the trustee body is aware of the incident, for example is it all trustees or just some of them?
 - 3.3.1.4. what happened and when the charity first became aware of it
 - 3.3.1.5. the action which has been taken or will be taken to deal with the incident and prevent future problems
 - 3.3.1.6. whether and when it has been reported to the police or another regulator/ statutory agency (including official reference numbers)
 - 3.3.1.7. media handling lines you may have prepared
- 3.3.2. Fraud and Cyber Crime should be reported to Action Fraud (see the charity's Fraud Prevention Policy FC03 for further details).
- 3.3.3. Theft should be reported to the Police by calling 101.
- 3.3.4. Serious incidents should also be reported in the Charity's Annual Report.

4. Charity Commission Deciding What to Report.

4.1. Inserted Charity Commission guidance on what to and what not to report can be found on the following page.

5. Crisis Management Communications Plan

- 5.1. Contacts & Responsibilities
 - 5.1.1. In the event of a major crisis or serious incident the following personnel will act as principal spokespeople for the charity, these include the appointed PR agency, CEO and Trustees responsible for the charity's communication strategy;
 - 5.1.1.1. Wolfstar PR, Claire Lomax 07714338198
 - 5.1.1.2. SEO, Stuart Robinson 07951145032
 - 5.1.1.3. Trustee, Megan Harrids-Dillnutt 07837 382618
 - 5.1.1.4. Trustee, Steven Ward 07795 822694
 - 5.1.2. Before making any public statements at least two members of the above group are required to identify the issues, risks and potential next steps.
- 5.2. Public Statements.
 - 5.2.1. A holding statement may be issued as soon as is possible highlighting key facts as known as that time.
 - 5.2.2. Proactively working with the media is key and the charity should aim to establish itself as a credible source by providing only clear facts.
 - 5.2.3. Communication should be channelled through the PR agency unless agreed otherwise by the Crisis Management team above. The representative should be freely available.
 - 5.2.4. The charity's own media channels (website, social media etc) should be updated as quickly as possible with any statements released.
 - 5.2.5. Future statements should be made available only as the facts are updated.

5.3. Third Party Support.

5.3.1. The Crisis Management Team may decide to call upon support from third parties such as Cobseo (0207 901 8903)

5.4. <u>Review</u>.

- 5.4.1. Detailed analysis of what went wrong and how this could be prevented in the future should take place as soon as possible with a clear action plan provided.
- 5.4.2. Stakeholders should be updated and giving details of future activities and plans.

6. Review

6.1. This policy is to be reviewed every 3 years but may be updated by the board of Trustees as required.

Next review date: 31st January 2019

Approved on behalf of the Trustees:	
Sign Name:	Sign Name:

Print Name:

Print Name:

Charity Policy: Trustee Expenses Policy (FC06)

Contents.

- 1. Introduction.
- 2. Reasonable Expenses.
- 3. Reclaiming Expenses.
- 4. Review.

1. Introduction – why we pay Trustee Expenses.

- 1.1. Paying reasonable expenses is a good way of ensuring that the whole Trustee board participates in running the charity and of ensuring that being a Trustee is open to all.
- 1.2. No Trustee, unless by personal choice, should be out of pocket as a result of carrying out their normal duties and responsibilities.
- 1.3. To ensure no Trustees are left out of pocket and no pressure is felt to not claim expenses, all reasonable expenses for organised Trustee group meetings will be paid to all attendees as standard.
- 1.4. Additional expenses occurred outside of the organised group meetings can also be claimed in line with the guidance on reasonable expenses below.
- 1.5. Individuals are welcome to donate their expenses back to the charity but there is no expectation of this and no monitoring or special acknowledgment of this.

2. Reasonable Expenses

- 2.1. As defined by the Charity Commission (CC11), reasonable expenses include, but are not limited to;
 - 2.1.1. The reasonable cost of travelling to and from trustee meetings, and on trustee business and events; this can include the cost of using public transport, taxi fares, and petrol allowances to the level permitted by HM Revenue & Customs (HMRC) before tax becomes payable.
 - 2.1.2. Reasonable refunds for the cost of meals taken while on charity business.
 - 2.1.3. The reasonable cost of childcare, or care of other dependants (for example, an elderly parent) whilst attending trustee meetings.
 - 2.1.4. The cost of postage and telephone calls on charity business.
 - 2.1.5. The costs of a trustee's telephone rental and broadband subscription, so long as these are split to reflect the percentage of time relating to usage on behalf of the charity.
 - 2.1.6. Communication support: translating documents into Braille for a blind trustee, or into different languages; provision of alerting and listening devices, and other special aids for people with hearing impairment.
 - 2.1.7. The costs of buying training materials and publications relevant to trusteeship.

- 2.1.8. Providing special transport, equipment or facilities for a trustee with a disability.
- 2.1.9. Cost of reasonable overnight accommodation and subsistence (including any essential care costs) while attending trustee meetings or other essential events such as voluntary sector conferences or specialist training courses.

3. Reclaiming expenses

- 3.1. In order to reclaim expenses, an Expense Claim Form will need to be completed. This has been sent via email to all Trustees but can be resent by contacting accounts@scottyslittlesoldiers.co.uk. Expenses must be submitted to the Treasurer for approval and are then passed to the Finance Team (accounts@scottyslittlesoldiers.co.uk) for processing. The Treasurer should submit expense requests to the Chair for approval.
- 3.2. All expenses should be reclaimed within 30 days of the month end and may be rejected if older than 90 days.

4. Review:

4.1. This policy is to be reviewed every 3 years but may be updated by the board of Trustees as required.

Next review date: 1st November 2022

Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

PEOPLE POLICIES

Policy documents related to our team members, volunteers and supporters



Charity Policy: Data Protection & Confidentiality Policy (PP01)

1. <u>Scope:</u>

This policy covers the data protection of staff, beneficiaries, customers, donors, volunteers, fundraisers and any other individual who the charity may collect personal data regarding.

2. Data Protection at Scotty's Little Soldiers:

For the charity's employee specific data protection policy please refer to the SLS Staff Handbook, page 17, for further information.

The charity takes the data protection of its stakeholders very seriously and takes every step possible to ensure any personal data collected is stored securely and if necessary destroyed safely.

3. What information we store:

We collect personal information such as name, address, email, phone and card or bank details. This information is provided to us by the user usually through a registration form for a fundraising activity, beneficiary activity or volunteer sign up form, by making a financial transaction such as a donation or shop purchase, or in other correspondence such as phone calls, post or email.

We may also securely store background and medical details of beneficiaries to ensure we provide the best possible personalised service and in the event of making any disclosures in line with our safeguarding policies.

We use cookies on our websites to improve the user experience. These cookies may keep details such as IP addresses and browsing history.

4. How we use your information:

Scotty's could use your information in the following ways:

- Process your donation or purchase.
- Provide more information about our services and activities.
- Deal with your registration or enquiry.
- Use your feedback through research or surveys to improve our services.
- Keep you informed about updates to our services, activities or products.
- Providing information to the authorities or a professional body as required by law.
- Confidential information may be disclosed to local authority Children's Services, Adult Services or the Police if an individual's health or welfare need protecting.

5. Third Party Partners:

We will never sell, rent or share your information with other charities or companies for their marketing purposes.

We may share your details with trusted third-party partners if they are providing a contracted service to the charity. For example delivering our products, developing our internal software applications, or providing secure financial transaction tools. These trusted partners are also required to comply with privacy and data legislation.

6. Where your information is stored:

We make every effort to store your data securely. Our main storage solutions are provided by Microsoft and Salesforce, two of the leading data organisations globally. We are a digitally led organisation and do not keep any paper copies of information long-term.

All data is kept in accordance with UK, EU and International law.

7. Controlling your data:

You are in control of the data we hold and can request details of this data at any time. You also have the right to have all data related to you deleted at any time.

You can request these details or to have your data deleted by email <u>data@scottyslittlesoldiers.co.uk</u> or by writing to Data Protection Officer, Scotty's Little Soldiers, Unit 21 Bergen Way, King's Lynn, Norfolk PE30 2JG.

8. <u>Review:</u>

This policy is to be review at least every 3 years but may be updated by the board of Trustees as required.

Next Review Date: 31st January 2020

9. <u>Approval on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Conflicts of Interest Policy (PP02)

1. <u>Scope:</u>

This policy helps to avoid any potential conflicts of interests, to highlight those conflicts of interest which do arise and how to therefore deal with them.

2. <u>Definition:</u>

Trustees have a personal responsibility to declare any personal or business related conflicts of interest arising from their involvement as a Trustee of Scotty's Little Soldiers (SLS).

3. Dealing with a Conflict of Interest:

Any personal or business related interests, and those of their spouse, partner, family or close relatives should be declared and included in the Register of Interests Document.

The Trustee in question should be removed from any decision making process involving the conflict of interest.

Details of any discussions relating to this removal and the decision making process should be documented and retained.

The Chair of the Trustees is responsible for enforcing this process unless the Chair has a conflict of interest in which case the Chair is required to delegate to another unconnected member of the board.

The recorded documentation should be circulated amongst the board and senior management team for transparency.

4. <u>Review:</u>

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: **31st January 2018**

5. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Date:

PP02 Conflicts of Interests Policy

Policy Document: Complaints Policy & Procedure (PP03).

1. <u>Scope:</u>

This policy covers the procedure for making complaints relating to activities carried out by on behalf of Scotty's Little Soldiers ('the charity').

2. Our policy is:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint.
- To make sure everyone at the charity knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To gather information which helps us to improve what we do

3. What is a complaint:

The charity deems a complaint to be an expression of discontent by a person regarding a service from the charity that cannot be immediately resolved, and about which the complainant desires a follow-up action is taken and a response provided.

4. <u>Who can complain?</u>

Anyone engaging with the charity's activities can make a complaints including volunteers, beneficiaries, fundraisers or members of the public who come into contact with the charity's activities.

5. <u>Responsibility:</u>

The responsibility for ensuring a complaint is fully investigated is held by the management team of the charity.

Any complaints made are discussed at the quarterly Trustee review meetings.

If a complaint is made which directly relates to a member of the management team it should be referred to the chair of Trustee to manage the investigation.

6. Making a Complaint:

- a) Complaints should be made in writing either by post to *Scotty's Little Soldiers, Complaints, Unit 21 Bergen Way, King's Lynn Norfolk PE30 2JG*, or via email and sent to <u>hello@scottyslittlesoldiers.co.uk</u> with the subject matter: *Complaint.*
- b) Complaints should be acknowledged upon receipt and a full response should be provided ideally within 4 weeks of the initial complaint. If this is not possible an update should be provided after 4 weeks.
- c) If the complainant believes the response is not satisfactory they can ask for their complaint to be reviewed at board level by the Trustees. The history of the complaint should be passed on to the Chair of Trustees for review at the next Trustee Review Meeting.
- d) The decision taken at this stage is final. The complainant may decide to take the complaint to an external third party such as the Charity Commission at this stage.

7. Monitoring and Review:

All complaint should be reported during the quarterly Trustee Review Meetings and any necessary learnings be put in place.

Changes to procedures or activities may be required if a complaint has been upheld.

8. Policy Review:

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2020

9. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Whistleblowing Policy (PP04)

1. <u>Scope:</u>

This policy has been agreed by the Trustees of Scotty's Little Soldiers ('the charity') to help avoid any malpractice within the charity and to allow members of staff to highlight any activity they might deem as malpractice without fear of recrimination.

2. <u>Definition:</u>

Whistleblowing as identified by the UK Government is:

'when a worker reports suspected wrongdoing at work. Officially this is called 'making a disclosure in the public interest'.

A worker can report things that aren't right, are illegal or if anyone at work is neglecting their duties, including:

- someone's health and safety is in danger
- damage to the environment
- a criminal offence
- the company isn't obeying the law (like not having the right insurance)
- covering up wrongdoing
- 3. <u>Whistleblowing Procedure:</u>

If your concern relates to a child's welfare it should be reported without delay. Please see Section 4 Whistleblowing Procedure: Child Welfare for specific details on how to report concerns or allegations.

If you suspect any other wrongdoing within the organisation please report it immediately to your line manager. If you believe your line manager maybe implicated in the wrongdoing you may report this directly to the Chief Executive.

You can report malpractice directly to the board of Trustees or to the Charity Commission if you suspect the organisation might: cover up the malpractice; treat you unfairly; or has been informed but has not acted.

For details on contacting the Charity Commission directly please refer to <u>www.gov.uk</u>

Contact details for the current board of Trustees can be found on the charity's Salesforce CRM under the 'Accounts' tab.

4. Whistleblowing Procedure: Child Welfare:

It is the duty of everyone in the organisation to pass on any allegations or concerns about a child's welfare without delay. Any concerns or allegations about a volunteer or staff member must be reported immediately:

• All concerns are referred to the Designated Child Protection Officer. That person must then refer to the individuals LADO (Local Authority Designated Officer) team following their referral route.

- Remember that the welfare of the child is paramount, so any concerns about the welfare of a child MUST be referred to the individuals Children's Services following their referral route immediately.
- The referral to LADO must be within 24 hours of a concern or allegation being made.
- It is important to share any concerns with LADO team and to make a joint and open decision as to how to proceed.
- In the rare situations that the concerns are about the Designated Safeguarding Officer, concerns must be referred to the Deputy Officer. This may not be appropriate, in which case any member may personally refer direct to the LADO team.
- In an emergency, dialling 999 may be the only sensible course of action.
- Both the LADO team and the police will advise, assist and support in any future actions you would need to take e.g. informing parents.
- Ensure that everyone understands that any whistle-blower disclosing information in good faith will be protected if s/he has a reasonable concern about a child.
- 5. <u>Review:</u>

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2020

6. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Date:

Print Name:

Charity Policy: Team Onboarding Policy & Procedure (PP12)

1. <u>Scope:</u>

Every member of our team, including office, beneficiary-event volunteers, and trustees, will undertake an onboarding programme to ensure that everyone understands both their roles and their responsibilities.

2. Procedure for Team Members (employed staff):

- Our onboarding process starts before our new team members even join the charity. All roles are clearly advertised and detailed job descriptions are included in our New Team Member packs. These packs include background on the charity's mission and what it's like to work within our team.
- Once an applicant has been successful they will be sent an offer of employment, a contract of employment and details of their agreed start date with an itinerary for their first week.
- All team members will be given clear details of tasks, responsibilities and timings.
- An onboarding pack is presented to all new team members on their first day working with the charity which includes further details about the charity's work, our culture code, an organisational chart, the history of the charity, frequently asked questions and copies of the organisations policies.
- These policies include health and safety, first aid arrangements and incident reporting.
- A link to all the charity's policies, which are accessibly to all Team Members via SharePoint, will also be sent individually by email to all new recruits and permanently displayed on the Microsoft Teams platform. The following documents will be highlighted as priority reading and all team members will be expected to read and understand them;
 - Child Protection Policy
 - Code of Conduct
 - Confidentiality Statement
 - Complaints Procedure
 - Whistleblowing Policy
 - o Disciplinary and Grievance Procedure.
- Special consideration is given to the charity's safeguarding which will include information about future or necessary training needs, for example the Safe Programme Safeguarding Children Training.
- 3. Procedure for Office & Beneficiary-Event Volunteers:
- All volunteers are provided with a clear list of tasks and responsibilities, timings, the charity's code of conduct and background information on the organisation.
- In addition all volunteers are also provided with access to the charity's policies and procedures including;
 - Child Protection Policy
 - Code of Conduct
 - Confidentiality Statement
 - o Complaints Procedure
 - Whistleblowing Policy

- Disciplinary and Grievance Procedure.
- \circ Health and safety, first aid and reporting arrangements.
- Office based volunteers or those attending a beneficiary event are required to have read and confirm understanding of the above documents.
- Special consideration is given to the charity's safeguarding which will include information about future or necessary training needs, for example the Safe Programme Safeguarding Children Training.
- 4. <u>Review:</u>

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2020

5. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Recruitment Policy (PP11)

1. <u>Scope:</u>

This policy has been agreed by the Trustees of Scotty's Little Soldiers ('the charity') to ensure all recruitment follows a fair and transparent process. Special consideration is given to roles which require working with children and young people and this policy has been created in line with the Safer Recruitment Guidance issued by the Norfolk Safeguarding Children Board.

2. Job Description & Person Specification:

All roles within the charity have a dedicated Job Description which includes clearly defined duties and responsibilities as well as a person specification which will include any qualifications, experience, skills, knowledge and key competencies required. Job descriptions are approved by departmental heads and the CEO.

3. Advertising Roles:

All positions within the charity are promoted on the charity's website, staff noticeboards and social media as a minimum. Most roles are also advertised within the appropriate channels for the position in question. This could be a web portal specialising in jobs, for example, for education professionals or qualified accountants.

Most roles based at the charity's head office are advertised in the local press/media.

Jobs advertisements will refer applicants to the charity's website for further details which will include the Job Description, New Team Member Pack.

The New Team Member pack includes full details of the charity's safeguarding policies, our culture code and the recruitment next steps.

4. Short Listing.

In most cases a closing date for applications will be provided. Following this date applicants will be shortlisted against the job descriptions and person specification.

Shortlisted candidates will be asked to complete an application form before coming for an interview.

5. <u>Application Form.</u>

The charity's application form includes personal details such as names, past and current work experience and details of qualifications. It will also include an explanation of all gaps in employment, current and previous addresses (past 5 years), two references, details of any convictions or cautions and a statement that the applicant is not disqualified from working with children or subject to any sanctions imposed by a regulatory body.

6. Interviewing.

All team member posts will require a minimum of one face to face interview. In most cases two interviews will take place with a minimum of two different charity representatives involved.

For roles related to working with children the interviewers will be trained in Safer Recruitment Interviewing and Warner-style questions will be used during the interview.

For volunteer roles, over the phone interviewing maybe appropriate, particularly for fundraising volunteers.

Applicants will be expected to bring photo ID with them to their interview.

7. <u>Successful Applications.</u>

All volunteers attending beneficiary events, team members and trustees are required to have an enhanced DBS disclosure check. Individuals will not be permitted to have contact with children until these checks have been completed and the charity is satisfied the applicant is suitable.

All team members receive a detailed onboarding process which is further explained in our Onboarding Policy document.

A 3-month probationary period is normal for all team members and volunteers during which time the individual will work closely with experienced members of staff.

All roles within the charity will have the appropriate level of safeguarding training delivered within 3 months of starting work.

8. <u>Review:</u>

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2020

9. Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Date:

Print Name:



Scotty's Little Soldiers Trustee Recruitment Process

The following process should be followed when recruiting new Trustees to the board of Scotty's Little Soldiers.

Recruitment Steps.

- 1. Identify the need The Trustee board is required to identify the need for any new Trustees for example due to a resignation of an existing Trustee or due to a gap in a specific skill among the existing board.
- 2. Job description / specification The Trustees are then required to create a brief description of the skills, experience and knowledge required for the new Trustee. This should be documented and retained on file.
- 3. The Trustees can delegate a smaller group to run the recruitment process although all Trustees will be required to approve candidates.
- Trustees should at this stage consider the most suitable method of finding new recruits to the board. This could be through advertising, a specialist recruiter or through the Trustees/ Charity's existing network on contacts.
- 5. Short-listing and interviews should follow. Notes of interviews should be retained on file.
- 6. Final candidates should receive a formal vetting by the complete Trustee board and if successful be formally invited to join the board (see 5.1 of Charity Commission document CC30 for advice on vetting potential Trustees).
- 7. Unsuccessful applicants should be thanked for their interest.
- 8. Upon appointment relevant parties should be informed (e.g. Charity Commission, Companies House, Solicitors, Auditors etc.).
- 9. A full induction programme should be implemented.

For full information and advice consult the Charity Commission document CC30.

Updated 8th April 2015.

Charity Policy: Team Onboarding Policy & Procedure (PP12)

1. <u>Scope:</u>

Every member of our team, including office, beneficiary-event volunteers, and trustees, will undertake an onboarding programme to ensure that everyone understands both their roles and their responsibilities.

2. Procedure for Team Members (employed staff):

- Our onboarding process starts before our new team members even join the charity. All roles are clearly advertised and detailed job descriptions are included in our New Team Member packs. These packs include background on the charity's mission and what it's like to work within our team.
- Once an applicant has been successful they will be sent an offer of employment, a contract of employment and details of their agreed start date with an itinerary for their first week.
- All team members will be given clear details of tasks, responsibilities and timings.
- An onboarding pack is presented to all new team members on their first day working with the charity which includes further details about the charity's work, our culture code, an organisational chart, the history of the charity, frequently asked questions and copies of the organisations policies.
- These policies include health and safety, first aid arrangements and incident reporting.
- A link to all the charity's policies, which are accessibly to all Team Members via SharePoint, will also be sent individually by email to all new recruits and permanently displayed on the Microsoft Teams platform. The following documents will be highlighted as priority reading and all team members will be expected to read and understand them;
 - Child Protection Policy
 - Code of Conduct
 - Confidentiality Statement
 - Complaints Procedure
 - Whistleblowing Policy
 - o Disciplinary and Grievance Procedure.
- Special consideration is given to the charity's safeguarding which will include information about future or necessary training needs, for example the Safe Programme Safeguarding Children Training.
- 3. Procedure for Office & Beneficiary-Event Volunteers:
- All volunteers are provided with a clear list of tasks and responsibilities, timings, the charity's code of conduct and background information on the organisation.
- In addition all volunteers are also provided with access to the charity's policies and procedures including;
 - Child Protection Policy
 - Code of Conduct
 - Confidentiality Statement
 - o Complaints Procedure
 - Whistleblowing Policy

- Disciplinary and Grievance Procedure.
- \circ Health and safety, first aid and reporting arrangements.
- Office based volunteers or those attending a beneficiary event are required to have read and confirm understanding of the above documents.
- Special consideration is given to the charity's safeguarding which will include information about future or necessary training needs, for example the Safe Programme Safeguarding Children Training.
- 4. <u>Review:</u>

This policy is to be reviewed annually but may be updated by the board of Trustees as required.

Next review date: 31st January 2020

5. <u>Approved on behalf of the Trustees:</u>

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Trustee Expenses Policy (FC06)

Contents.

- 1. Introduction.
- 2. Reasonable Expenses.
- 3. Reclaiming Expenses.
- 4. Review.

1. Introduction – why we pay Trustee Expenses.

- 1.1. Paying reasonable expenses is a good way of ensuring that the whole Trustee board participates in running the charity and of ensuring that being a Trustee is open to all.
- 1.2. No Trustee, unless by personal choice, should be out of pocket as a result of carrying out their normal duties and responsibilities.
- 1.3. To ensure no Trustees are left out of pocket and no pressure is felt to not claim expenses, all reasonable expenses for organised Trustee group meetings will be paid to all attendees as standard.
- 1.4. Additional expenses occurred outside of the organised group meetings can also be claimed in line with the guidance on reasonable expenses below.
- 1.5. Individuals are welcome to donate their expenses back to the charity but there is no expectation of this and no monitoring or special acknowledgment of this.

2. Reasonable Expenses

- 2.1. As defined by the Charity Commission (CC11), reasonable expenses include, but are not limited to;
 - 2.1.1. The reasonable cost of travelling to and from trustee meetings, and on trustee business and events; this can include the cost of using public transport, taxi fares, and petrol allowances to the level permitted by HM Revenue & Customs (HMRC) before tax becomes payable.
 - 2.1.2. Reasonable refunds for the cost of meals taken while on charity business.
 - 2.1.3. The reasonable cost of childcare, or care of other dependants (for example, an elderly parent) whilst attending trustee meetings.
 - 2.1.4. The cost of postage and telephone calls on charity business.
 - 2.1.5. The costs of a trustee's telephone rental and broadband subscription, so long as these are split to reflect the percentage of time relating to usage on behalf of the charity.
 - 2.1.6. Communication support: translating documents into Braille for a blind trustee, or into different languages; provision of alerting and listening devices, and other special aids for people with hearing impairment.
 - 2.1.7. The costs of buying training materials and publications relevant to trusteeship.

- 2.1.8. Providing special transport, equipment or facilities for a trustee with a disability.
- 2.1.9. Cost of reasonable overnight accommodation and subsistence (including any essential care costs) while attending trustee meetings or other essential events such as voluntary sector conferences or specialist training courses.

3. Reclaiming expenses

- 3.1. In order to reclaim expenses, an Expense Claim Form will need to be completed. This has been sent via email to all Trustees but can be resent by contacting accounts@scottyslittlesoldiers.co.uk. Expenses must be submitted to the Treasurer for approval and are then passed to the Finance Team (accounts@scottyslittlesoldiers.co.uk) for processing. The Treasurer should submit expense requests to the Chair for approval.
- 3.2. All expenses should be reclaimed within 30 days of the month end and may be rejected if older than 90 days.

4. Review:

4.1. This policy is to be reviewed every 3 years but may be updated by the board of Trustees as required.

Next review date: 1st November 2022

Approved on behalf of the Trustees:

Sign Name:

Sign Name:

Print Name:

Print Name:

Date:

Charity Policy: Health & Safety Policy (PP06)

This is the statement of general policy and arrangements for Scotty's Little Soldiers CIO.

The board of Trustees has overall responsibility for the Health and Safety of the charity's team members. The designated Trustee overseeing H&S is: Jason Worthy. Day to day running of the charity is the responsibility of the CEO: Stuart Robinson. The charity's day to day Health & Safety Officer is Sarah Woonton.

Statement of General Policy	Responsibility	Actions
Prevent accidents and work-related ill health by managing the health and safety risks in the workplace.	Stuart Robinson	Relevant risk assessments completed, actioned and reviewed.
Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work	Stuart Robinson / Sarah Woonton	Team members given necessary H&S induction, provided with appropriate training & equipment.
Engage and consult with employees on day-to-day health and safety conditions	Stuart Robinson / Sarah Woonton / All Staff	Team members consulted on H&S matters routinely and at the annual formal H&S reviewing meeting.
Implement emergency procedures – evacuation in case of fire or other significant incident. You can find help with your fire risk assessment at: https://www.gov.uk/workplace-fire-safety-your-responsibilities	Stuart Bohinson	Escape routes well signed and clear at all times. Evacuation plans tested periodically and updated as needed.
Maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances	Stuart Robinson	Toilets, washing facilities and drinking water provided. System in place for routine equipment inspections and action to be promptly taken to address any defects.

Approved on behalf of the Trustees:

Sign Name:	Sign Name:
Print Name:	Print Name:
Date:	Date:
Next Review Date: 1st March 2021	
Health & Safety Law Poster displayed in RECEPTION	
First Aid Box located in KITCHEN	
Accident book located in POST ROOM	

Charity Policy: Health & Safety Policy (PP06)

Risk Assessment.

Date of Assessment: 4th March 2020

				Actions		
What are the hazards?	Who might be harmed and how?	What are we already doing?	Do we need to do anything else to control the risk?	Who	When	Completed
Slips and Trips	Team members and all visitors may be injured if they trip or slip over.	Good housekeeping / All areas well lit / No trailing leads / keeping work areas clear.	Better housekeeping in warehouse area - team to put equipment away properly after use.	All staff	31/03/2020	
Manual handling of office supplies and equipment	Risk of injury to team members from handling heavy objects.	Ask for assistance before moving items solo / use a trolley if necessary / store heavy items on ground/low level shelves.	Remind team members not to lift heavy objects without support.	CEO	31/03/2020	
Display Screen Equipment	Posture issues for team members, risk of injuries, pain or discomfort from overuse of poorly designed workstations/set ups.	Additional display solutions provided when requested / Laptops for flexible working supplied / adjustable blinds to control lighting / office lighting replaced / Freedom to take breaks as required.	DSE training and assessments of workstations / Monitors made available to all laptop users / variation of workstations (e.g. standing) made available (all to be implemented for office move).	CEO	01/10/2020	
Stress	Team members could be affected by stress linked to workload, bullying, unclear job descriptions etc.	Clearly defined roles / regular catch ups / share calendar and task management tools / open office (no closed doors - access to leadership team at all times) / Team Members responsible for own time management / Holiday available at short notice.	Remind team members they can share any concerns with colleagues or leadership confidentially at any time.	CEO	Monthly	
Electrical	Risk of electric shock from faulty equipment.	Staff trained to spot and report potential defects / Defective equipment to be isolated immediately	Conduct electrical testing in new office	Trustee (LP)	01/10/2020	
Fire	If trapped, team members could suffer fatal injuries from smoke inhalation or burns.	Annual fire risk assessment completed and actions taken where necessary.	Ensure all actions identified are completed.	CEO	Ongoing	
Lone Working	Team members could suffer injury or illness out of sight.	Calendars updated at all times so team member whereabouts known / External doors locked from the inside when working alone in the office / Last person to leave the office posts message in Teams to say they are leaving.	New security door system fitted to new office / Team members to be aware of 'off-site' team members and keeping in contact.	TEAM	Ongoing	

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