

**COMPLAINTS POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No.1104212**

Forces Children's Trust views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the person **or organisation** that has made the complaint.

Our policy is:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
- To make sure everyone at Forces Children's Trust 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

**Definition of a Complaint**

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of Forces Children's Trust.

**Where Complaints Come From**

Complaints may come from any person or organisation who has a legitimate interest in Forces Children's Trust.

A complaint can be received verbally, by phone, by email or in writing.

This policy does not cover complaints from staff.

**Confidentiality**

All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

**Responsibility**

Overall responsibility for this policy and its implementation lies with the CEO and the Trustees.

**Complaints Procedure of Forces Children's Trust**

**Publicised Contact Details for Complaints:**

Written complaints may be sent to Forces Children's Trust at 65 Shawley Way Epsom Downs Surrey KT18 5PD or by e-mail at [Denny.Wise@forceschildrenstrust.org](mailto:Denny.Wise@forceschildrenstrust.org)

Verbal complaints may be made by phone to [01737 361077](tel:01737361077).

## **Receiving Complaints**

Complaints may arrive through channels publicised for that purpose or through any other contact details or opportunities the complainant may have.

Complaints received by telephone or in person need to be recorded.

The person who receives a phone or in person complaint should:

- Write down the facts of the complaint
- Take the complainant's name, address and telephone number
- Note down the relationship of the complainant to Forces Children's Trust for example: client, member)
- Tell the complainant that we have a complaints procedure
- Tell the complainant what will happen next and how long it will take
- Where appropriate, ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.

## **Resolving Complaints**

### **Stage One**

In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received by that person, they may be able to resolve it swiftly and should do so if possible and appropriate.

Whether or not the complaint has been resolved, the complaint information should be passed to Caroline Parry .

On receiving the complaint, Caroline Parry records it in the complaints log. If it has not already been resolved she can investigate it and take appropriate action.

If the complaint relates to a specific person, they should be informed and given a fair opportunity to respond.

Complaints should be acknowledged by the person handling the complaint within a week. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply. A copy of this complaints procedure should be attached.

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

### **Stage Two**

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed by another Trustee. At this stage, the complaint will be passed to Alison Hayes.

The request for another Trustee to review the complaint should be acknowledged within a week of receiving it. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

The person who receives Stage Two complaints may investigate the facts of the case themselves. This may involve reviewing the paperwork of the case and speaking with the person who dealt with the complaint at Stage One.

If the complaint relates to a specific person, they should be informed and given a further opportunity to respond.

The person who dealt with the original complaint at Stage One should be kept informed of what is happening.

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

The decision taken at this stage is final, unless the Trustees decides it is appropriate to seek external assistance with resolution.

### **External Stage**

The complainant can complain to the Charity Commission at any stage.

Information about the kind of complaints the Commission can involve itself in can be found on their website at: [www.charitycommission.gov.uk/publications/cc47.aspx](http://www.charitycommission.gov.uk/publications/cc47.aspx)

### **Variation of the Complaints Procedure**

The Trustees may vary the procedure for good reason. This may be necessary to avoid a conflict of interest, for example, a complaint about the Chair should not also have the Chair as the person leading a Stage Two review.

## **Monitoring and Learning from Complaints**

Complaints are reviewed annually to identify any trends which may indicate a need to take further action Appendix 1 - Practical Guidance for Handling Verbal Complaints

- Remain calm and respectful throughout the conversation
- Listen - allow the person to talk about the complaint in their own words. Sometimes a person just wants to "let off steam"
- Don't debate the facts in the first instance, especially if the person is angry
- Show an interest in what is being said
- Obtain details about the complaint before any personal details
- Ask for clarification wherever necessary
- Show that you have understood the complaint by reflecting back what you have noted down
- Acknowledge the person's feelings (even if you feel that they are being unreasonable) - you can do this without making a comment on the complaint itself or making any admission of fault on behalf of the organisation  
e.g "I understand that this situation is frustrating for you"
- If you feel that an apology is deserved for something that was the responsibility of your organisation, then apologise
- Ask the person what they would like done to resolve the issue
- Be clear about what you can do, how long it will take and what it will involve.
- Don't promise things you can't deliver
- Give clear and valid reasons why requests cannot be met
- Make sure that the person understands what they have been told
- Wherever appropriate, inform the person about the available avenues of review or appeal

## **CONFLICT OF INTEREST POLICY**

### **FORCES CHILDREN'S TRUST**

**Charity No.1104212**

(As written in the Governing Document)

1

No Trustee may buy goods or services from the charity, or sell goods or services to the charity, or receive remuneration, or receive any other financial benefit from the charity or from any trading company owned by the charity, except in accordance with the Governing Document.

2

The Trustees may employ, or enter into a contract for the supply of goods or services with one of their number. Before doing so, the Trustees must be satisfied that it is in the best interests of the charity to employ or contract with that Trustee rather than someone who has no connection with the charity. In reaching that decision they must balance the advantage of employing a Trustee against the disadvantages of doing so (especially the loss of the Trustee's services as a result of dealing with the Trustee's conflict of interest as required by the next sub-clause). The remuneration or other sums paid to the Trustee must not exceed an amount that is reasonable in all circumstances. The Trustees must record the reason for their decision in their minutes.

3

A Trustee must be absent from any meeting at which his or her employment or remuneration, or any matter concerning the contract are discussed. He or she must also be absent from the part of any meeting at which his or her performance of the contract is considered. He or she must not vote on any matter relating to his employment or the contract and must not be counted when calculating whether a quorum of Trustees is present at the meeting.

4

This clause applies to a firm of which the Trustee is a partner as it applies to a Trustee personally.

**Crisis Management Policy**  
**Forces Children's Trust**  
**Charity No.1104212**

The Forces Children's Trust has adopted policies and procedures to minimise risks and these are regularly reviewed. The Trustees recognise that not all circumstances are under the control of the FCT and that emergencies and disasters may happen.

A crisis is defined as any event that can cause harm to Forces Children's Trust's reputation.

This could mean an incident that has caused death or serious injury to employees, volunteers and participants in FCT events or a financial situation that could affect funds held

If an incident occurs that could generate media interest the Trustees will

- manage all media and social media statements, press releases, interviews and media visits as appropriate
- monitor press/media coverage and taking action as required
- manage internal communications
- advise or take advice on actions necessary to protect Forces Children's Trust's reputation

**Immediate actions once a crisis has taken place**  
**The Founder/CEO Denny Wise will:**

Inform board of Trustees, keep them updated and utilize their expertise if required

Notify next of kin, if appropriate

Liaise with third parties e.g. event organiser, police, emergency services, and hospital

Provide flow of information for the media through further statements

Begin detailed recording of actions in response to crisis

Begin to monitor media output and respond promptly to misinformation

Explain to media the limitations to information that can be provided. Be honest

Anticipate media demands/requirements. E.g. access to families

Establish links with communications personnel at key agencies involved in the crisis

(e.g. health, police, fire, event organiser) and ensure they have immediate copies of

anything Forces Children's Trust releases and vice versa

Keep chronological record of information released to media and date/time of release

Keep log of key decisions made and reasons for them

Log all media questions and answers provided

**After the Event**

Evaluation meeting to review the event and lessons learnt, and evaluate the crisis plan as well as relevant policies.

**DATA PROTECTION POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No. 1104212**

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
1. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
2. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
3. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
4. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
5. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

**2. General provisions**

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

**3. Lawful, fair and transparent**

- a. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

**4. Lawful purposes**

- a. All data processed by the charity must be done on one of the following

lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interest.

- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

## **5. Data minimisation**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

**FUNDRAISING POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No. 1104212**

**INTRODUCTION**

The Board of Forces Children's Trust is committed to ensuring that fundraising activities are carried out in an ethical manner.

This policy applies to the Board, casual, permanent and contract staff and volunteers.

**PURPOSE**

The purpose of this document is to identify the Forces Children's Trust position on fundraising practice and to document the standards expected in raising funds from the community.

**POLICY**

**OUR GUIDING FUNDRAISING PRINCIPLE IS A SIMPLE ONE – WE WILL ONLY USE TECHNIQUES THAT WE WOULD BE HAPPY TO BE USED ON OURSELVES.**

In doing so, the organisation will adhere to the following standards:

- Fundraising activities carried out will comply with all relevant laws.
- Any communications to the public made in the course of carrying out a fundraising activity shall be truthful and non-deceptive.
- All monies raised via fundraising activities will be for the stated purpose of the appeal and will comply with the organisation's stated mission and purpose.
- All personal information collected by Forces Children's Trust is confidential and is not for sale or to be given away or disclosed to any third party without consent.
- Nobody directly or indirectly employed by or volunteering for Forces Children's Trust shall accept commissions, bonuses or payments for fundraising activities on behalf of the organisation.
- No general solicitations shall be undertaken by telephone or door-to door.
- Fundraising activities should not be undertaken if they may be detrimental to the good name or community standing of Forces Children's Trust.

Financial contributions will only be accepted from companies, organisations and individuals the Board considers ethical.

**INVESTMENT POLICY  
FORCES CHILDREN'S TRUST  
Charity No. 1104212**

**1. Introduction**

The Forces Children's Trust is a charity who help children in need whose father or mother has died or sustained life threatening injuries whilst a serving member of the British armed forces.

Donations come from the Armed Forces, corporate, small groups i.e.; masonic lodges, churches, schools, rotary clubs and also private individuals.

The Trustees are governed by the Trustee Act 2000, which sets out the general power of investment.

The Forces Children's Trust has approximately £1m of assets.

**2. Investment Objectives**

The Forces Children's Trust seeks to produce the best financial return within an acceptable level of risk. As the level of donations can fall at any time capital preservation is of paramount importance.

Assets should be readily available to meet unanticipated cash flow requirements.

**3. Risk**

The Forces Children's Trust assets should be held in investments denominated in sterling.

The key risk to long term investment is inflation and the assets should be invested to mitigate this risk over the long term. The Trustees understand that this is likely to mean that investment will be concentrated in real assets and that the capital value will fluctuate.

The short term reserves are held to provide financial security and may be required at short notice. As such capital volatility cannot be tolerated and investment of these assets should be focused on minimising this.

**4. Liquidity Requirements**

The Forces Children's Trust maintains a bank account for all the financial needs on a daily basis. To supplement this, money can be transferred from other accounts. At least one account held should be instant access.

## **5. Time Horizon**

The Forces Children's Trust is expected to exist in perpetuity and investments should be managed to meet the investment objective to ensure this sustainability.

The Forces Children's Trust has divided its reserves into those expected to be held for a long time horizon and those that may be needed short term.

## **6. Management, Reporting and Monitoring**

The CEO monitors the investments value and income regularly.

The Trustees review the investments performance at the twice yearly meetings.

## **7. Approval and Review**

This investment policy statement was prepared to provide a framework for the management of the Forces Children's Trust's investment assets. It will be reviewed on an annual basis to ensure continuing appropriateness.

**PAYING STAFF POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No. 1104212**

**Introduction**

The Forces Children's Trust Trustees have recognised that to run the charity in a professional manner there is a need to employ staff to assist in the administration involved with the day to day running of the charity. The hours worked and the number of staff should be reviewed on an annual basis.

**Staff Remuneration**

All staff must have a written contract.

Staff should have paid holiday, sick pay and be offered a work place pension.

The salary paid, hours of work etc will be decided by the Trustees and detailed in the individual's contract.

The Trustees should review the salary annually.

**Payments to Trustees**

Forces Children's Trust Trustees are not paid for their work as a Trustee.

Trustees can be reimbursed for reasonable out of pocket expenses. They may also be paid for undertaking special work for the charity, provided that this meets the criteria of the Charity Commission guidance "Payments to Charity Trustees – What the Rules Are" and is within the guidelines as written in the governing document.

**Disclosures Within the Annual Report and Accounts**

In accordance with the Charity Commission's Statement on Recommended Practice 2015 (SORP) and guidance contained within the National Council for Voluntary Organisations' 'Report of the Inquiry into Charity Senior Executive Pay', Forces Children's Trust will include or disclose the following in its Annual Report and Accounts:

- a statement that summarises this remuneration policy
- payments to trustees
- the actual salary and other benefits received by the Chief Executive
- a summary of pensions and other benefits received by staff

**RESERVES POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No 1104212**

It is the policy of the Forces Children's Trust to maintain reserves at a level that balances our objectives to develop and support services with our need to remain financially stable.

A minimum level of £100,000.00 of unrestricted expenditure is considered sufficient to cover staff wages, administration and support costs and to respond to emergency needs that may arise from time to time.

If the level of funds held by the Forces Children's Trust reduces to this amount the Trustees must decide whether the charity is still viable in the long term.

The Forces Children's Trust does not own a property so there are no mortgage repayments to consider nor does it rent any property.

**Monitoring and Review**

The CEO and the Trustees, will regularly review the operation of this policy.

## **RISK MANAGEMENT POLICY**

### **FORCES CHILDREN'S TRUST**

**Charity No. 1104212**

#### **This policy:**

- Is a formal acknowledgement that the Trustee board is committed to maintaining a strong risk management framework. The aim is to ensure that the charity makes every effort to manage risk appropriately by maximising potential opportunities whilst minimising the adverse affects of risks.
- Should be used to support the internal control systems of the charity, enabling the charity to respond to operational, strategic and financial risks regardless of whether they are internally or externally driven.

#### **Risk policy objective**

- To confirm and communicate the charity's commitment to risk management.
- To establish a consistent framework and protocol for determining appetite for and tolerance of risk and for managing risk.
- To assign accountability to management and staff for risks within their control and provide a structured process for risk to be considered, reported and acted upon throughout the organisation.

#### **Risk policy statement**

The Trustees and executive management of the charity believe that sound risk management is integral to both good management and good governance practice.

Risk management should form an integral part of the charity's decision-making and be incorporated within strategic and operational planning.

Risk assessment will be conducted on all new activities and projects to ensure they are in line with the charity's objectives and mission.

Any risks or opportunities arising will be identified, analysed and reported at an appropriate level.

The charity will regularly review and monitor the effectiveness of its risk management framework and update it as considered appropriate.

Reports will be made to the Trustees by the CEO at the Trustees meetings of continuing and emerging high concern risks and those where priority action is needed to effect better control.

#### **Organisational roles**

##### **The role of the Trustees**

- To ensure that a culture of risk management is embedded throughout the charity
- To set the level of risk appetite and risk tolerance for the organisation as a whole and in specific circumstances
- To communicate the charity's approach to risk and set standards of conduct expected of staff
- To ensure risk management is included in the development of business plans, budgets and when considering strategic decisions
- To approve major decisions affecting the charity's risk profile or exposure
- To satisfy itself that less fundamental risks are being actively managed and controlled
- To regularly review the charity's approach to risk management and approve any changes to this

##### **The role of the CEO**

- To ensure that risk management policy is implemented throughout the organisation
- To anticipate and consider emerging risks and to keep under review the assessed level of likelihood and impact of existing key risks
- Provide regular and timely information to the Trustees on the status of risks and their mitigation
- To implement adequate corrective action in responding to significant risks; to learn from previous mistakes and to ensure that crisis management plans are sufficiently robust to cope with high level risk

In addition the charity expects to meet minimum standards required by legislation and best practice in operational areas covering the following

- IT and data protection
- HR
- Health and safety
- Governance
- Financial accounting and reporting
- Management of volunteers, etc

The risk of falling short of these standards is mitigated as far as possible by ensuring that appropriate policies and working practices are adopted in each of these key areas and that staff are adequately experienced and trained to manage this. Where necessary, external advice is sought to supplement internal expertise.

## POTENTIAL RISKS

### GOVERNANCE

Potential risk	Potential impact	Steps to mitigate risk
The charity lacks direction, strategy and forward planning	<ul style="list-style-type: none"> <li>• the charity drifts with no clear objectives, priorities or plans</li> <li>• issues are addressed piecemeal with no strategic reference</li> <li>• needs of beneficiaries not fully addressed</li> <li>• financial management difficulties</li> <li>• loss of reputation</li> </ul>	<ul style="list-style-type: none"> <li>• create a strategic plan</li> <li>• which sets out the key aims, objectives and policies</li> <li>• create financial plans and budgets</li> <li>• use job plans and targets</li> <li>• monitor financial and operational performance</li> <li>• get feedback from beneficiaries and funders</li> </ul>
Conflicts of interest	<ul style="list-style-type: none"> <li>• charity unable to pursue its own interests and agenda</li> <li>• decisions may not be based on relevant considerations</li> <li>• impact on reputation</li> <li>• private benefit</li> </ul>	<ul style="list-style-type: none"> <li>• agree protocol for disclosure of potential conflicts of interest</li> <li>• put in place procedures for standing down on certain decisions</li> <li>• review recruitment and selection processes</li> </ul>
Loss of key staff	<ul style="list-style-type: none"> <li>• experience or skills lost</li> <li>• operational impact on key projects and priorities</li> <li>• loss of contact base and corporate knowledge</li> </ul>	<ul style="list-style-type: none"> <li>• succession planning</li> <li>• document systems, plans and projects</li> <li>• implement training programmes</li> <li>• agree notice periods and handovers</li> <li>• review and agree recruitment processes</li> </ul>
Reporting to trustees (accuracy, timeliness and relevance)	<ul style="list-style-type: none"> <li>• inadequate information resulting in poor quality decision making</li> <li>• failure of trustees to fulfil their control functions</li> <li>• trustee body becomes remote and ill informed</li> </ul>	<ul style="list-style-type: none"> <li>• put in place proper strategic planning, objective setting and budgeting processes</li> <li>• timely and accurate project reporting</li> <li>• timely and accurate financial reporting</li> <li>• assess and review projects and authorisation procedures</li> <li>• have regular contact between trustees and senior staff and managers</li> </ul>

## OPERATIONAL RISK

Potential risk	Potential impact	Steps to mitigate risk
Fund-raising	<ul style="list-style-type: none"> <li>• unsatisfactory returns</li> <li>• reputational risks of campaign or methods used</li> <li>• actions of agents and commercial fund-raisers</li> <li>• compliance with law and regulation</li> </ul>	<ul style="list-style-type: none"> <li>• implement appraisal, budgeting and authorisation procedures</li> <li>• review regulatory compliance</li> <li>• monitor the adequacy of financial returns achieved (benchmarking comparisons)</li> <li>• stewardship reporting in annual report</li> </ul>
Competition from similar organisations	<ul style="list-style-type: none"> <li>• loss of contract income</li> <li>• reduced fund-raising potential</li> <li>• reduced public profile</li> <li>• profitability of trading activities</li> </ul>	<ul style="list-style-type: none"> <li>• monitor and assess performance and quality of service</li> <li>• review market and methods of service delivery</li> <li>• agree fund-raising strategy</li> <li>• ensure regular contact with funders</li> <li>• monitor public awareness and profile of charity</li> </ul>
Health, safety and environment	<ul style="list-style-type: none"> <li>• staff injury</li> <li>• product or service liability</li> <li>• ability to operate</li> <li>• injury to beneficiaries and the public</li> </ul>	<ul style="list-style-type: none"> <li>• comply with law and regulation</li> <li>• train staff and compliance officer</li> <li>• put in place monitoring and reporting procedures</li> </ul>
Information technology	<ul style="list-style-type: none"> <li>• systems fail to meet operational need</li> <li>• failure to innovate or update systems</li> <li>• loss/corruption of data eg donor base</li> <li>• lack of technical support</li> <li>• breach of data protection law</li> </ul>	<ul style="list-style-type: none"> <li>• appraise system needs and options</li> <li>• appraise security and authorisation procedures</li> <li>• implement measures to secure and protect data</li> <li>• agree implementation and development procedures</li> <li>• use service and support contracts</li> <li>• create disaster recovery procedures</li> <li>• consider outsourcing</li> <li>• review insurance cover for any insurable loss</li> </ul>

## FINANCIAL RISK

Potential risk	Potential impact	Steps to mitigate risk
Budgetary control and financial reporting	<ul style="list-style-type: none"> <li>• budget does not match key objectives and priorities</li> <li>• decisions made on inaccurate financial projections or reporting</li> <li>• decisions made based on unreliable costing data or income projections</li> </ul> <p>inability to meet commitments or key objectives</p> <ul style="list-style-type: none"> <li>• poor credit control</li> <li>• poor cash flow and treasury management</li> <li>• ability to function as going concern</li> </ul>	<ul style="list-style-type: none"> <li>• link budgets to business planning and objectives</li> <li>• monitor and report in a timely and accurate way</li> <li>• use proper costing procedures for product or service delivery</li> <li>• ensure adequate skills base to produce and interpret budgetary and financial reports</li> <li>• agree procedures to review and action budget/cash flow variances and monitor and control costs</li> <li>• regularly review reserves and investments</li> </ul>
Reserves policies	<ul style="list-style-type: none"> <li>• lack of funds or liquidity to respond to new needs or requirements</li> <li>• inability to meet commitments or planned objectives</li> <li>• reputational risks if policy cannot be justified</li> </ul>	<ul style="list-style-type: none"> <li>• link reserves policy to business plans, activities and identified financial and operating risk</li> <li>• regularly review reserves policy and reserve levels</li> </ul>
Investment policies	<ul style="list-style-type: none"> <li>• financial loss through inappropriate or speculative investment</li> <li>• unforeseen severe adverse investment conditions</li> <li>• financial loss through lack of investment advice, lack of diversity</li> <li>• cash flow difficulties arising from lack of liquidity</li> </ul>	<ul style="list-style-type: none"> <li>• review and agree investment policy</li> <li>• obtain proper investment advice or management</li> <li>• consider diversity, prudence and liquidity criteria</li> <li>• implement adequate reserves policy</li> <li>• use regular performance monitoring</li> </ul>
Fraud or error	<ul style="list-style-type: none"> <li>• financial loss</li> <li>• reputational risk</li> <li>• loss of staff morale</li> <li>• regulatory action</li> <li>• impact on funding</li> </ul>	<ul style="list-style-type: none"> <li>• review financial control procedures</li> <li>• segregate duties</li> <li>• set authorisation limits</li> <li>• agree whistle-blowing anti fraud policy</li> <li>• review security of assets</li> <li>• identify insurable risks</li> </ul>

## ENVIROMENTAL OR EXTERNAL FACTORS

Potential risk	Potential impact	Steps to mitigate risk
Public perception	<ul style="list-style-type: none"> <li>• impact on voluntary income</li> <li>• impact on use of services by beneficiaries</li> <li>• ability to access grants or contract funding</li> </ul>	<ul style="list-style-type: none"> <li>• communicate with supporters and beneficiaries</li> <li>• ensure good quality reporting of the charity's activities and financial situation</li> <li>• implement public relations training/procedures</li> </ul>
Adverse publicity	<ul style="list-style-type: none"> <li>• loss of donor confidence or funding</li> <li>• loss of influence</li> <li>• impact on morale of staff</li> <li>• loss of beneficiary confidence</li> </ul>	<ul style="list-style-type: none"> <li>• implement complaints procedures (both internal and external)</li> <li>• agree proper review procedures for complaints</li> <li>• agree a crisis management strategy for handling - including consistency of key messages and a nominated spokesperson</li> </ul>
Relationship with funders	<ul style="list-style-type: none"> <li>• deterioration in relationship may impact on funding and support available</li> </ul>	<ul style="list-style-type: none"> <li>• ensure regular contact and briefings to major funders</li> <li>• report fully on projects</li> <li>• meet funders' terms and conditions</li> </ul>

## COMPLIANCE RISK (LAW AND REGULATION)

Potential risk	Potential impact	Steps to mitigate risk
Compliance with legislation and regulations appropriate to the activities, size and structure of the charity	<ul style="list-style-type: none"> <li>• fines, penalties or censure from licensing or activity regulators</li> <li>• loss of licence to undertake particular activity</li> <li>• employee or consumer action for negligence</li> <li>• reputational risks</li> </ul>	<ul style="list-style-type: none"> <li>• identify key legal and regulatory requirements</li> <li>• allocate responsibility for key compliance procedures</li> <li>• put in place compliance monitoring and reporting</li> <li>• prepare for compliance visits</li> <li>• obtain compliance reports from regulators (where appropriate) - auditors and staff to consider and action at appropriate level</li> </ul>

Taxation	<ul style="list-style-type: none"> <li>• penalties, interest and 'back duty' assessments</li> <li>• loss of income eg failure to utilise gift aid arrangements</li> <li>• loss of mandatory or discretionary rate relief</li> <li>• failure to utilise tax exemptions and reliefs</li> </ul>	<ul style="list-style-type: none"> <li>• review PAYE compliance procedures</li> <li>• review VAT procedures</li> <li>• file timely tax returns</li> <li>• understand exemptions and reliefs available (direct tax and VAT)</li> <li>• take advice on employment status and contract terms and tax</li> <li>• implement budget and financial reporting identifying trading receipts, and tax recoveries</li> </ul>
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Professional advice	<ul style="list-style-type: none"> <li>• lack of investment strategy or management</li> <li>• failure to optimise fiscal position</li> <li>• contract risks</li> <li>• failure to address compliance risks</li> </ul>	<ul style="list-style-type: none"> <li>• identify and ensure access to professional advice</li> <li>• identify issues where advice is required</li> <li>• conduct compliance reviews</li> </ul>
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**SERIOUS INCIDENT REPORTING POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No.1104212**

The Charity Commission requires charities to report serious incidents. If a serious incident takes place within the charity, it is important that there is prompt, full and frank disclosure to the Commission. The FCT Trustees will report what has happened and let the Commission know how it is being dealt with even if it has been reported to the police, donors or another regulator.

What is a serious incident?

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to the charity's beneficiaries, staff, volunteers or others who come into contact with the charity through its work
- loss of the charity's money or assets
- damage to the charity's property
- harm to the charity's work or reputation

The main categories of reportable incident are:

- protecting people and safeguarding incidents –incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the charity through its work
- financial crimes –fraud, theft, cyber-crime and money laundering
- large donations from an unknown or unverifiable source, or suspicious financial activity using the charity's funds
- other significant financial loss
- links to terrorism or extremism, including 'proscribed' (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff
- other significant incidents, such as –insolvency, forced withdrawal of banking services without an alternative, significant data breaches/losses or incidents involving partners that materially affect the charity.

It is the responsibility of the FCT Trustees to decide whether an incident is significant and should be reported.

**Action to take**

If something does go wrong the Trustees will take immediate action to:

- prevent or minimise any further harm, loss or damage
- report it to the Commission as a serious incident
- report it to the police (and/or other relevant agencies) if a suspected crime has been committed, and to any other regulators the charity is accountable to
- plan what to say to staff, volunteers, members, the public, the media and other stakeholders, such as funders
- review what happened and prevent it from happening again –this may include reviewing internal controls and procedures, internal or external investigation and/or seeking appropriate help from professional advisers.

**VOLUNTEER MANAGEMENT POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No.1104212**

The Forces Children's Trust does not at present require regular volunteers. The Trustees would need to develop a more detailed policy should the charity need volunteers on a day to day basis i.e helping in the office.

**Single Events**

Should assistance be required at an event with children present the person helping must be DBS checked.

**Residential Events**

Adults supervising on trips involving overnight stays must be DBS checked. A risk assessment should be made available to them and details of their responsibilities should be discussed with the individuals.

**Volunteer Remuneration**

Volunteers should be paid for any out of pocket expenses. These expenses could include:

Travel

Postage and telephone costs if working from home

Essential equipment, such as protective clothing

The FCT has fundraisers who must supply passport details and proof of address before being sent a letter of authorisation and i.d card saying they are officially able to raise funds for a year on behalf of the FCT. After one year if no funds have been received the office must follow this up.

**VULNERABLE BENEFICIARIES POLICY**  
**FORCES CHILDREN'S TRUST**  
**Charity No.1104212**

The FCT is committed to a practice that protects Vulnerable Beneficiaries from harm.

For the purposes of this policy, Vulnerable Beneficiaries are defined as children under the age of 18.

Trustees, Staff and volunteers in this organisation accept and recognise our responsibilities to develop awareness of issues, which could cause Vulnerable Beneficiaries harm.

We will safeguard children, young people by

- Adopting child protection guidelines through a code of behaviour for staff and volunteers.
- Sharing information about child protection and good practice with children, parents, staff and volunteers.
- Sharing information about concerns with relevant agencies who need to know, and involving parents and children appropriately.
- Following carefully the procedures for recruitment and selection of staff and volunteers
- Providing effective management for staff and volunteers through supervision, support and training.
- Reviewing our policy annually and reflecting on any reports made, reviewing the effectiveness of the reporting process every quarter.

**WHAT IS ABUSE?**

The following definitions are taken from The Department for Children Schools and Families (2013) Working Together to Safeguard Children document.

**ABUSE:** 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. (e.g. via the internet). They 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 meet 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 ill treatment 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 alone.

**SEXUAL ABUSE:** Involves forcing or enticing a child or young person 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 (including via the internet). 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:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
  - Protect a child from physical and emotional harm or danger;
  - Ensure adequate supervision (including the use of inadequate care-givers); or
  - Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

## **ROLE OF THE DESIGNATED PERSON FOR CHILD PROTECTION**

The Designated Person is Caroline Parry who is responsible for:

Providing the 'first port of call' and offering advice and support to all staff regarding child protection issues.

- Making referrals as necessary.
- Ensuring that staff and volunteers understand their responsibilities for being alert to the signs of abuse and for referring any concerns to the designated person responsible for child protection
- Keeping up to date with changes and developments in child protection. Ensuring that new staff receive induction about child protection procedures and existing staff receive training as required
- Organising information relating to child protection so that this is accessible to all staff.

## **CODE OF BEHAVIOUR**

### Statement of Intent

It is the policy of the FCT to safeguard the welfare of all children and young people by protecting them from all forms of abuse including physical, emotional and sexual harm.

This organisation is committed to creating a safe environment in which young people can feel comfortable and secure while engaged in any of the FCT's programmes, training events, workshops or other activities. Personnel should at all times show respect and understanding for individual's rights, safety and welfare, and conduct themselves in a way that reflects the ethos and principles of the FCT.

### ATTITUDES

Guidelines for all FCT staff and volunteers:

- Staff and volunteers should be committed to treating children and young people with respect and dignity.
- Always listening to what a child or young person is saying
- Valuing each child and young person
- Recognising the unique contribution each individual can make
- Encouraging and praising each child or young person

### STAFF CONDUCT

Staff and volunteers should:

- Endeavour to provide an example which we would wish others to follow
- Use appropriate language with children and young people and challenge any inappropriate language used by a young person or child or an adult working with young people.
- Respect a young person's right to privacy
- Always dress professionally appropriately at all times
- Be aware that someone might misinterpret our actions no matter how well intentioned
- Never draw any conclusions about others without checking the facts
- Never allow themselves to enter become embroiled in inappropriate situations, including tantrums or crushes
- Never exaggerate or trivialise child abuse issues or make suggestive remarks or gestures about, or to a child or young person,

#### CONTACT WITH VULNERABLE BENEFICIARIES

Staff and volunteers should:

- Should actively avoid spending any time alone with children or vulnerable beneficiaries, away from others
- In the unlikely event of having to meet with an individual child or vulnerable beneficiary this meeting must be as open as possible, and other FCT staff members will be informed of the location and approximate length of the meeting. The meeting should not take place in a room that is not private, unless absolutely necessary. If no adult is available as company to the meeting, the young person will be encouraged to bring a friend.

#### PHYSICAL CONTACT

- Staff and volunteers should never engage in any type of physical contact with any young person or vulnerable beneficiary without first asking permission.
- Staff and volunteers should never allow inappropriate touching of any kind.

#### **Sharing Information about Child Protection and Good Practice with Children, Staff and Volunteers**

Good communication is essential in any organisation. At the FCT every effort will be made to assure that, should individuals have concerns, they will be listened to and taken seriously.

It is the responsibility of the Trustees to ensure that information is available to, and exchanged between all those involved in this organisation and its activities. Some information is confidential and should only be shared on a strictly need-to-know basis.

**WHISTLEBLOWING POLICY  
FORCES CHILDREN'S TRUST  
Charity No. 1104212**

This is a copy of our Whistleblowing policy which applies to everyone who carries out work for the Forces Children's Trust in the UK.

**Introduction**

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards in accordance with our policies and procedures. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

**The aims of this policy are:**

- To encourage staff to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected
- To provide staff with guidance as to how to raise those concerns
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

**Who does this policy apply to?**

This policy applies to everyone who carries out work for the FCT in the UK, including:

- Partners
- All employees
- Contractors and sub-contractors
- Agency staff
- Consultants
- Trustees
- Work experience or other trainees

**What is whistleblowing?**

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behaviour).

You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity
- Miscarriages of justice
- Practices endangering health and safety

- Practices damaging the environment
- Failure to comply with a legal obligation
- Bribery
- Financial malpractice, impropriety or fraud
- Attempts to conceal any of the above.

If you have any genuine concerns related to any of the above, you should report it under this policy.

### **Protection and support for whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff members that raise genuine concerns under this policy, even if they turn out to be mistaken.

### **Protected disclosures**

An individual making a “protected disclosure” is given statutory protection from victimisation under the Public Interest Disclosure Act 1998 (PIDA), provided the disclosure is in the public interest.

The Public Interest Disclosure Act (PIDA) 1998 provides protection to "workers" making disclosures in the public interest and allows such individuals to claim compensation for victimisation following such disclosures.

### **Raising a whistleblowing concern**

All whistleblowing disclosures will be treated as confidential. In the first instance you should bring the matter to the attention of your immediate manager who will inform the Trustees. If the disclosure contains allegations about your immediate manager or the malpractice occurs at this level, you may make the disclosure directly to the Trustees.

You should make it clear that you are making your disclosure within the terms of the FCT whistleblowing policy. This will ensure the recipient of the disclosure realises this and takes the necessary action to investigate the disclosure and to protect the whistleblower’s identity. We will then get in touch with you to discuss your concern. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result.

You should treat any information about the investigation as confidential. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

## **Confidentiality**

We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

## **Breach of this Policy**

Action will be taken against any one being found to have subjected a whistleblower to any form of detrimental treatment. It may also be taken if you have intentionally misled us in respect of any matter, breached this Policy in any other way and/or if we believe that you have made a false allegation maliciously.

The independent whistleblowing charity, Public Concern at Work, 020 3117 2530 operates a confidential helpline and free independent advice. They also have a list of prescribed regulators for reporting certain types of concern.