



NIGEL PROSSER FOUNDATION

working together to support SEN families



Policies Handbook

v1.2 April 2026

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Handbook version control - Approval and review

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1.0	Board	November 2024	Initial draft approved	Annually
1.1	Board	March 2025	Safeguarding policy update	Annually
1.2	Board	April 2026	Addition of Tainted Charity Donations Statement	Annually

Financial Controls Policy

v1.0 November 2024

Applicability

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

Budgeting

The Board is to scrutinise and approve an annual budget. The budget should include prudent income forecasts that have been tested to confirm that there is a reasonable expectation of securing the funding planned for.

Financial Reporting

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

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

Financial Management

Bank accounts are to be reconciled at least monthly. Any variances to balances and/or unusual or unexpected transactions are to be investigated and appropriate action taken. Any significant issues should be reflected in reports to the Board.

Cash

- Cash payments are avoided wherever possible.
- Any cash spent on behalf of Nigel Prosser Foundation may be reclaimed through expenses.
- Any cash collected (through fundraising etc.) is to be banked in a timely manner.
- All transactions must be recorded.

Banking

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

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

International Transfers – There are specific risks and regulations, such as the Financial Action Task Force (FATF), relating to transferring currency internationally. There are also specific regulatory requirements in some countries and strict HMRC guidelines on transferring charitable funding overseas that must be complied with.

Income

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

- Records of income received agree with bank statements; and
- All transfers or other direct payments into the bank can be identified and verified against paperwork.

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

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

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

Expenditure

The prior approval of the Board of Trustees is required for any expenditure, projects or proposals in excess of £1000 that are not included financial year forecast. All expenditure must be properly authorised, represent good value for money and be on appropriate items or services.

Payment Procedures

Payments systems, such as cheque books, credit cards and on-line systems and passwords should be adequately safeguarded. Physical items, such as e banking encryption devices and cheque books should be kept under lock and key when not in use. Passwords should not be written down or shared, and should be changed regularly and if compromised.

Travel Expenses

Pre-approval should be received prior to any travel being booked or taken. Expense claims will be reimbursed providing the purpose of travel was valid, undertaken and the amounts claimed are reasonable in the circumstances. Expenses claims are to be checked to ensure that the expenses policy has been complied with.

Novel and Contentious Expenditure

This is defined as follows:

- Novel – does not meet the letter of our regulations. That is, using a budget for a purpose for which it was not intended. For example, payment of a bonus to an individual, when there is no such provision in the pay policy. Or exceeding permissible limits. For example, payment of subsistence rates or class of hotel accommodation that exceed the limits in the expenses policy.
- Contentious – meets the letter of the relevant policy, but where the need for it or the cost involved may be questioned. For example, where subsistence has been approved within agreed limits, but alcohol or other inappropriate expenditure is claimed for.

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

Fixed Assets and Equipment

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

In general, the minimum value for an item to be treated as a capital asset is £250.

- Subsequent to the annual review, insurance cover is reviewed to prevent being under or over insured.

Cryptoassets

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

Fraud/Bribery

If fraud or bribery is suspected it is to be brought to the attention of the CEO.

Hospitality

Employees may be offered hospitality in the form of being taken out to drinks or events, or gifts by suppliers or others. It is essential that this is entirely above board and can be demonstrated to be so.

Records

- Records of Accounts are to be retained for 7 years and supporting vouchers for 18 months.
- The archived records are to be organised to enable records to be easily identified and retrieved.

IT and Online Security

- Security software, such as anti-virus and firewalls, are to be kept up-to-date, preferably by automatic renewal.
- There are effective controls for authorising and managing access.
- Software updates are installed promptly.
- Passwords are strong, not shared and changed regularly.
- Financial information stored on shared drives is accessible only to those who need to have access to it.
- Staff and volunteers are aware of what they need to do (and not do) to maintain online security.

On leaving the organisation, an individual's accounts are to be disabled.

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Version No.	Approved by	Approval date	Main changes	Review period
1.0	Board	November 2024	Initial draft approved	Annually



Reserves Policy

v1.0 November 2024

Scope

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

Oversight

Once a reserves policy is a living document, so describes the process we will follow in creating it. The amount held in reserves will be monitored during the course of the year as part of our budgetary process and financial monitoring.

Reserves

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

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

Restricted Funds

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

Developing Our Policy

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

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

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

We will use the above process to identify why reserves might need to be held and to decide the amount of reserves needed to operate effectively. We use the Charity Commission guidance on reserves (included below) which sets an approach that can be used by smaller charities which do not hold significant amounts of endowed funds, property or operate a defined benefit pension scheme or carry out activities through trading subsidiaries.

Charity Commission guidance on reserves: A simple approach to developing a reserves policy

The following 3 questions are designed to help guide trustees of smaller charities through the issues that need to be considered when developing their reserves policy.

Question 1. Does your charity need to keep reserves?

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

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

If, after considering the above, you think that reserves are needed, go to question 2.

Question 2. How much do you need in reserve?

The reserves level may be a target amount or a target range. For example, for each reason set out in question 1:

- a) An amount might be needed to meet an unforeseen emergency or other unexpected need – consider risks and how much might be needed for such contingencies; this will involve judgment of events that may occur and their likelihood
- b) Look at your expenditure budget – do you need a small contingency fund to meet unforeseen operational costs?
- c) Uncertainty over future income might mean having reserves equivalent to a number of weeks of income equivalent to a range of £x to £y, to allow time to develop new sources of income or to cut-back on related expenditure
- d) A planned spending commitment which cannot be met from future income would imply a need for a specific sum to be set aside – often this amount will be included within designations in accounts
- e) An amount might be needed to cover ‘troughs’ in the cash budget – review budgets to ascertain how much might be needed

In summary, the financial risks you identify should influence the amount of reserves you target to hold.

Question 3. Have you got any funds in reserve at the end of the year?

The final step is to compare what you might need in reserve with what you actually hold. You should:

- Calculate the amount of any reserves according to the definition of reserves given in section 3.1 of the guidance
- State the amount of reserves held and compare with the target amount or target range set for reserves
- Explain any shortfall or excess in reserves against target set
- Explain any action being taken or planned to bring reserves into line with your target

Where the difference is small, no action may be needed.

Levels of Reserves

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

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

Monitoring of Reserves

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

Investing Reserves

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

Version control – Approval and review

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1.0	Board	November 2024	Initial draft approved	Annually

Risk Management Policy

v1.0 November 2024

Introduction

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

Purpose

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

Scope

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

Charity Commission Guidance

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

Risk Management Cycle

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

- Identification. Identify the various risks that may materialise.
- Quantifying. Assess and quantify these risks.
- Managing. Take appropriate action to manage these risks. This is usually the weakest area in a risk management framework. Risks can be managed as follows:
 - o Avoidance. Action that can be taken to avoid a risk occurring.
 - o Mitigation. Action that can be taken to reduce the impact a risk may have, if it occurs.
 - o Buying Out. Generally, this is done using insurance.
 - o Accepting. Risk cannot be eliminated entirely, and any steps taken to manage risk must be reasonable, as resources are not unlimited in terms of money and time. Equally, adopting a purely risk averse approach limits opportunity.
- Reviewing. Risks should be reviewed as regularly as is necessary, depending on their likely probability and impact in the light of changing circumstances. This may be done on an ongoing basis, at appropriate points in projects or at regular meetings.

Responsibilities

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

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

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

Risk Identification and Assessment

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

Risk Mitigation and Management

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

Reporting and Communication

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

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

Review and Continuous Improvement

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

Training and Awareness

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

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1.0	Board	November 2024	Initial draft approved	Annually

Conflict of interest Policy

v1.0 November 2024

This policy aims to ensure that all decisions made by the organisation are in the best interests of the charity and free from conflicts of interest. It establishes a framework for identifying, disclosing, and managing conflicts of interest that may arise among trustees, staff, and volunteers.

Definition of Conflict of Interest

A conflict of interest occurs when an individual's personal interests—financial, familial, or otherwise—compete with their obligations to the charity. This may include situations where an individual has a financial stake in a business that provides services to the charity or has a close relationship with someone seeking a position or contract with the charity.

Scope

This policy applies to all trustees, staff, volunteers, and any individuals representing the charity.

Responsibilities

Trustees and staff must disclose any potential conflicts of interest to the board or relevant authority. It is the responsibility of the board to review disclosures and determine the appropriate course of action.

Disclosure Procedures

All individuals must disclose any potential conflicts of interest as soon as they arise, using the designated disclosure form. Disclosures should be made at the beginning of each board meeting or whenever a relevant situation arises.

Management of Conflicts

The board will review disclosed conflicts and decide whether the individual should abstain from discussions and decision-making related to the conflict.

In cases of significant conflicts, the individual may be asked to resign from their position.

Record Keeping

A register of declared conflicts of interest will be maintained and reviewed annually to ensure transparency and compliance with this policy.

Training and Awareness

The charity will provide regular training on identifying and managing conflicts of interest to all trustees, staff, and volunteers.

Review of Policy

This policy will be reviewed annually and updated as necessary to ensure it remains effective and compliant with legal and regulatory requirements.

Version control - Approval and review

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Safeguarding Policy

v1.1 March 2025

Purpose

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

Applicability

This policy applies to anyone working on our behalf, including our trustees, volunteers, partner organisations and independents exhibiting at our events.

Whilst partner organisations and independents exhibiting at our events should have their own safeguarding procedures in place, they agree to adhere to, and meet the standards outlined below as a minimum when working or volunteering in connection with Nigel Prosser Foundation, and include any additional legal or regulatory requirements specific to their work. These include, but are not limited to other UK regulators, if applicable.

Principles

We believe that:

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

Types of Abuse

Abuse can take many forms, such as physical, psychological or emotional, financial, sexual or institutional abuse, including neglect and exploitation.

Reporting Concerns

- If a crime is in progress, or an individual is in immediate danger, call the police, as you would in any other circumstances.
- If you have any concerns please make them known to our Designated Safeguarding Lead (DSL), who will always be in attendance at any Nigel Prosser Foundation event. The DSL has the responsibility to take appropriate action.
- Should your concern be connected to the DSL then please contact the Safeguarding Champion.
- The trustees are mindful of their reporting obligations to the Charity Commission in respect of Serious Incident Reporting and, if applicable, other regulator. They are aware of the Government guidance on handling safeguarding allegations.

Responsibilities

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

Designated Safeguarding Lead (DSL). The DSL is aware of and will comply with the Charity Commission guidance on safeguarding and protecting people, and any additional legal or regulatory requirements specific to their work. These include, but are not limited to other UK regulators, if applicable.

The DSL will have the responsibility for the oversight of all aspects of safety, including:

- Creating a culture of respect, in which everyone feel safe and able to speak up.
- An annual review of safety, with recommendations to the Safeguarding Champion.
- Ensuring that any issues are properly investigated and dealt with quickly, fairly and sensitively, and any reporting to the Police/statutory authorities is carried out.
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of our risk management processes.
- Ensuring that all relevant checks are carried out in recruiting staff and volunteers.
- Planning programmes/activities to take into account potential safeguarding risks, to ensure these are adequately mitigated.
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required.
- If deemed appropriate, ensuring that a central register is maintained and subject to regular monitoring to ensure that DBS clearances and training are kept up-to-date.
- Listening and engaging, beneficiaries, staff, volunteers and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these and reporting all concerns to the Safeguarding Champion.

Trustees. This safeguarding policy will be reviewed and approved by the Board annually. Trustees are aware of and will comply with the Charity Commission guidance on safeguarding and protecting people, and any additional legal or regulatory requirements specific to their work. These include, but are not limited to other UK regulators, if applicable.

A nominated board member will be assigned as Safeguarding Champion and will have the responsibility for the oversight of all aspects of safety, including:

- Creating a culture of respect, in which everyone feel safe and able to speak up.
- An annual review of safety, with recommendations to the Board.
- Ensuring that any issues are properly investigated and dealt with quickly, fairly and sensitively, and any reporting to the Police/statutory authorities is carried out.
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of our risk management processes.
- Ensuring that all relevant checks are carried out in recruiting staff and volunteers.
- Planning programmes/activities to take into account potential safeguarding risks, to ensure these are adequately mitigated.
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required.
- If deemed appropriate, ensuring that a central register is maintained and subject to regular monitoring to ensure that DBS clearances and training are kept up-to-date.
- Listening and engaging, beneficiaries, staff, volunteers and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these.

Fundraising

We will ensure that:

- We comply with the Code of Fundraising Practice, including fundraising that involves children.
- Our fundraising material is accessible, clear and ethical, including not placing any undue pressure on individuals to donate.
- We do not either solicit nor accept donations from anyone whom we know or think may not be competent to make their own decisions.

Online Safety

We will identify and manage online risks by ensuring:

- Volunteers, staff and trustees understand how to keep themselves safe online. We may use high privacy settings and password access to meetings to support this.
- We protect people's personal data and follow data protection legislation.
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.

Working With Other Organisations

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

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

Version control – Approval and review

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1.0	Board	November 2024	Initial draft approved	Annually
1.1	Board	March 2025	Amendments to applicability, reporting and responsibilities	Annually

Social Media Policy

v1.0 November 2024

Purpose

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

The Law

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

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

Our Spokespeople

We have a number of spokespeople to represent us; namely our Founders and our Trustees. They can be contacted through the generic email address of thenigelprosserfoundation@yahoo.com

Guidelines

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

Nigel Prosser Foundation will abide by the following guidelines at all times.

- Do not breach privacy or security. Do not post personal information, such as someone's home address, and never post about individuals without their consent, unless there is little if any doubt it would be given. Remember that individuals who may not be fully competent, perhaps due to a disability or illness, such as dementia, may not be able to give consent.
- Don't make it easy for criminals by posting information that they might use. For example, that the lock on the front door has broken (again), you will be taking a lot of cash to the bank or working late on your own.
- Clearly state your opinions are your own.
- Appear human. Observing certain guidelines does not mean you have to sound like a robot. Speak in the first person; bring your personality to the forefront.
- Write using your 'tone of voice'.
- Always be courteous in any responses.
- Think first, upload after. If something gets online, it stays there for a long time.
- Be politically neutral. It is essential to be not only politically-neutral, but seen to be. Aim to influence positively without criticism. Equally, treat all recognised political parties with respect and support any of their initiatives that support your own aims, but do not actively support or promote any individual party.
- Posts should always be respectful of beneficiaries and portray them in a way they would wish to be, and not cause embarrassment, offence or alarm.
- Extremist views, sexism, pornography/distressing or otherwise offensive imagery, racial/ethnic or religious discrimination, homophobia or disparaging comments against any minority group, such as the disabled or mentally ill is not acceptable under any circumstances.
- Take into account potential social and/or cultural differences in your audience who may be more sensitive to particular issues or subjects than the wider population.

Text and Symbols

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

Respect copyright, fair use and other laws.

We undertake to ensure all copyright, fair use and other laws are abided by in our use of imagery. Consent forms for use of images and videos shared with us are held on file from our charity partner organisations. Where we require imagery that isn't available directly from us, we have access to a licenced for non-editorial usage image library.

Moderation

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

- Anything we believe may fall into any of the categories in the section above titled 'The Law'.
 - o We would remove any post that contained views that we feel the majority of reasonable people would consider to be offensive.
 - o The use of 'swear words' would normally also be considered offensive;
 - o As would derogatory comments about an individual or organisation.
 - o Any post that is irrelevant to our work and the online conversations being held.

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

Version control - Approval and review

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1.0	Board	November 2024	Initial draft approved	Annually

Complaints Policy

v1.0 November 2024

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

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

Informal Complaints

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

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

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

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

Formal Complaints

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

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

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

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

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

If the complainant is not satisfied with the response, he or she may appeal the decision, by writing to the Chair, the contact details of whom will included in our response. Appeals must be submitted within 28 days of our response to the complaint. The appeal should be specific about why the individual feels the decision made was wrong and provide the facts and information necessary to demonstrate this.

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

Wider Action

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

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

Anonymous Complaints

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

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

Potential Compensation Claims

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

Confidentiality

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

Availability

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

Version control - Approval and review

Version No.	Approved by	Approval date	Main changes	Review period
1.0	Board	November 2024	Initial draft approved	Annually



Bullying And Harassment Policy

v1.0 November 2024

Purpose

The purpose of this policy is to protect anyone who is involved with our foundation from harassment and bullying and to ensure that we respond promptly, proportionately and sensitively to any concerns raised and, insofar as possible, treat these confidentially.

Applicability

This policy applies to anyone working on our behalf, including our trustees and other volunteers. It is to be brought to their attention on joining the foundation and made readily available to anyone who may wish to read it. We expect partner organisations to have the same robust approach in tackling harassment and bullying. We will not accept anyone being harassed or bullied by a partner, beneficiary or member of the public and will take appropriate action in such circumstances.

Bullying And Harassment

Bullying and harassment is behaviour that makes someone feel intimidated or offended. Harassment is unlawful under the Equality Act 2010.

Examples of bullying or harassing behaviour include:

- Spreading malicious rumours.
- Unfair treatment.
- Picking on or regularly undermining someone.
- Denying someone's training or promotion opportunities.

Bullying and harassment can happen face-to-face or by letter, email, and phone.

Behaviour that one individual may consider to be acceptable, another may not, so it is important that everyone is respectful of and sensitive to the needs and views of others. However, bullying does not include appropriate criticism of someone's behaviour or proper performance management.

The Law

Bullying itself is not against the law, but harassment is. This is when the unwanted behaviour is related to one of the following: age, sex, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief and sexual orientation.

Trustee Responsibilities

The trustees recognise that:

- There is no place for bullying and harassment within, or by, charities.
- They have a responsibility to lead the foundation and create a culture of openness and respect in which harassment and bullying will not be tolerated and individuals feel confident in reporting any concerns.
- They have a central role to play to ensure the foundation has clear policies, and.
- Allegations are handled promptly, sensitively, appropriately and in line with employment and other laws.
- They are responsible for ensuring they have processes in place to hear and address any concerns.

Reporting Concerns

Those concerned about bullying or harassment are encouraged to take their concerns directly to the foundation or its trustees whenever this is appropriate.

Concerns raised anonymous will be recorded and any facts available looked in to. However, in doing so we will be mindful that anonymous complaints can sometimes be malicious. Everyone involved in our work, even incidentally, has a right to complain and we will hold anyone accountable but, equally, individuals have a right to be protected from unsubstantiated and, potentially, malicious allegations. Consequently, anyone wishing to raise a concern is strongly encouraged to provide his or her contact details. This will also allow us to advise him or her of the outcome.

Serious actual or alleged incidents of bullying or harassment will be promptly reported to the Charity Commission using the serious incident reporting arrangements. Workers and volunteers can also make reports to the Commission.

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Engaging External Speakers at Charity Events Policy and Procedures

v1.0 November 2024

Policy Statement

Nigel Prosser Foundation (NPF) is committed to delivering impactful charity events while maintaining the highest ethical standards. This policy provides guidance for engaging external speakers, including our ambassadors, at charity events, in accordance with the UK Charity Commission’s guidance.

Scope

This policy applies to all charity events organized by NPF that involve external speakers, including our ambassadors.

Objective

The objective of this policy is to ensure that NPF’s charity events are conducted professionally, respectfully, and in compliance with the UK Charity Commission’s guidance.

Procedures

Step 1: Speaker Selection

1. NPF will select speakers, including our ambassadors, for charity events based on their relevance to the event’s purpose and the potential impact of their involvement.
2. Ambassadors will be invited to speak at events where their expertise or experiences align with the event’s goals.

Step 2: Speaker Invitation

1. NPF will formally invite selected speakers, outlining the event’s date, purpose, and expectations.
2. Invitations will include a clear request for confirmation and availability.

Step 3: Speaker Agreement

1. Upon acceptance, NPF will enter into an agreement with the speaker or ambassador, detailing expectations, remuneration (if applicable), and any other relevant terms.
2. The agreement will outline the nature of the event, the speaker’s role, and their responsibilities.

Step 4: Event Management

1. NPF will provide clear event guidelines to speakers, ensuring they understand the event’s objectives and expected conduct.
2. Speakers, including ambassadors, will be expected to act in a manner that aligns with NPF’s values and charity mission.
3. Speakers must agree not to include content that could lead to inciting hatred, unrest, offence, or political bias.

4. Speakers, due to the nature of our work with young people, should act as role models and safeguard young people. They should not encourage unhealthy lifestyles or conduct, including alcohol, drugs, or gambling.

Step 5: Feedback and Evaluation

1. NPF will solicit feedback from event attendees regarding the performance of external speakers, including ambassadors.
2. Feedback will be considered for future event planning and speaker selection.

Step 6: Data Protection

1. NPF will handle any personal data of external speakers in compliance with data protection laws.
2. Consent for the use of personal data will be obtained when required.

Step 7: Expenses and Remuneration

1. Expenses and remuneration for external speakers, if applicable, will be processed in line with NPF’s Expenses Policy.

Step 8: Review and Compliance

1. This policy will be reviewed periodically to ensure its effectiveness and alignment with the UK Charity Commission’s guidance.

Guidance Statement

Speakers and ambassadors engaged by NPF are expected to uphold the principles of promoting positive values, respect, and social responsibility. Content presented at NPF charity events should not incite hatred, unrest, offense, or political bias or bring the work of the Foundation into disrepute.

NPF reserves the right to address any breaches of this guideline to ensure the integrity of its events and mission is maintained.

Speakers should at all times conduct themselves as role models, safeguarding young people, and refraining from promoting unhealthy lifestyles or behaviours, including alcohol, drugs, or gambling.

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Health & Safety Policy

v1.0 November 2024

About this Policy

It is the policy of Nigel Prosser Foundation (NPF) (We, Our; Us), including all and any trading names connected with them, to pursue and promote at all levels of employment within our workforce measures which shall aim to ensure and protect the health and safety of all employees and any other persons connected with our operations including guests and visitors. This policy applies to all staff members, trustees and volunteers.

Status of this Policy

This policy does not form part of any contract of employment.

We will inform and consult with all staff members about this policy and health and safety matters.

Our Health and Safety Standards

The implementation of this policy will fulfil all and any legislative requirements which we are subject to by ensuring:

- That all reasonable and practical steps and measures are taken to safeguard the health, safety and welfare of all staff members while at work.
- That the safety and health of any members of the public, or any other persons who may visit sites and locations where we carry out its business operations, is protected so far as is reasonably practicable.
- That sufficient measures are implemented by us to prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace.
- Provision of clear and adequate information, instructions and training to all staff members to ensure that they are competent to carry out their work in a responsible and safe manner.
- Provision of clear and adequate information, instructions and training to all staff members to ensure that they are competent to carry out their work in a responsible and safe manner.
- That we maintain safe and healthy working conditions, provide and maintain all necessary equipment and any other goods or tools which are necessary for staff members to carry out the duties of their role with us.

Health and Safety Information

Health and Safety Officer

The person who has the overall responsibility for overseeing our health and safety duties is and implementing all of the safety actions set out below is: Michelle De-Torre

Risk Assessments

Relevant risk assessments shall be completed and actions arising out of those assessments shall be implemented where necessary. Where working habits or conditions change risk assessments shall be reviewed.

Training

Staff members shall be given necessary health and safety inductions and provided with appropriate training and personal protective equipment where necessary.

Fire Safety

The landlord of the property we rent is responsible for fire exits and fire equipment. All staff members and any other persons to whom this policy applies should ensure that they familiarise themselves with the fire safety procedures (including the location of all fire exits and fire equipment).

First Aid and Accidents

We shall ensure that any work related injuries or accidents are dealt with properly and investigated as appropriate. We shall ensure that full records are kept of any accidents and that these are reported to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) database as appropriate.

Our accident book is held by: Michelle De-Torre

All accidents or workplace injuries should be reported to the above-named person as soon as is reasonably practicable.

Public Health Emergencies and Infectious Diseases

We shall always ensure that our working environment and spaces which are accessible to the public are kept clean and properly ventilated.

Staff members are reminded to regularly wash hands and maintain good standards of hygiene to minimise the spread of infectious diseases.

In the event of any public health emergency, we shall adjust working conditions accordingly and shall consult all applicable government advice.

Screens and Computers

All staff members who use computer screens and other forms of screens as a significant part of their role

- Are encouraged to take regular breaks.
- Shall receive training and information to reduce the risks posed by regular use of screens.
- Are entitled to a workstation assessment to reduce any risks which may be present.
- Shall be entitled to eyesight tests at our expense.

Facilities

All relevant facilities such as toilets taps and heating shall be provided and maintained by us. We shall ensure that these facilities are always safe to use through a system of routine inspection and cleaning and will take appropriate action where any defects are found.

Equipment and Machinery

Implementation of systematic inspections and testing of our equipment and machinery and ensuring that any necessary action is carried out promptly and efficiently where problems or defects are uncovered. All faults should be reported to the Health and Safety Officer as soon as they are discovered.

Duties of staff members

All staff members must cooperate in the implementation of this policy and to assist in ensuring that we maintain a safe working environment. All staff members have a duty to:

- Work and conduct themselves in a manner that promotes and ensures their own safety and the safety of others.
- Follow and obey procedures and practices that have been designed and implemented by us to ensure safe and healthy working conditions.
- Use any machinery, equipment goods, tools and safety devices following the relevant product instructions and by any specific training which has been issued.
- Report any accident, injury or any other working condition which they believe to be unsafe or of immediate danger to the appropriate person (as described above).
- Assist with any necessary investigations of accidents to introduce new measures to prevent reoccurrence.

Updates to this policy

This policy shall be reviewed annually and shall be updated where appropriate.

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Whistleblowing Policy

v1.0 November 2024

1. Policy Statement

1.1 This policy aims to enable and encourage staff to raise concerns within Nigel Prosser Foundation (NPF). It recognises a worker's legal rights to make a protected disclosure to certain prescribed persons or bodies under the Public Interest Disclosure Act 1998 and any subsequent legislation, as incorporated into the Employment Rights Act 1996.

1.2 Nigel Prosser Foundation (NPF) is committed to creating a safe, open and transparent workplace culture, where employees are encouraged to raise concerns at the earliest opportunity. Nigel Prosser Foundation (NPF) recognises that employees are often the first to realise that there may be something seriously wrong within an organisation.

1.3 It is important to Nigel Prosser Foundation (NPF) that any fraud, misconduct or wrongdoing by workers or officers of the organisation is reported and properly dealt with. Nigel Prosser Foundation (NPF) is committed to tackle malpractice and wrongdoing. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. If any cases of wrongdoing are upheld, they will be seriously dealt with.

1.4 Nigel Prosser Foundation (NPF) encourages staff to use internal mechanisms for reporting malpractice or illegal acts or omissions by employees or ex-employees. Employees will be listened to and serious concerns will be investigated.

1.5 Nigel Prosser Foundation (NPF) will provide regular refresher training to all managers enabling them to deal with concerns that are raised and is committed to treating all disclosures consistently and fairly.

1.6 Nigel Prosser Foundation (NPF) will ensure that all new employees, supervisors and managers will receive induction on the policy and will provide refresher training to all members of staff so that they are aware of whistleblowing law and know how to use this policy.

1.7 Adequate resources will be made available to fulfil the aims of this policy. The policy will be widely promoted, and copies will be freely available.

1.8 This policy allows staff to take the matter further if they are dissatisfied with the management response and aims to reassure staff that they will be protected from harassment or victimisation from co-workers or from Nigel Prosser Foundation (NPF) for raising concerns.

2. Definitions and scope

2.1 This policy applies to all staff including temporary, casual and agency staff, work experience, trainees and apprentices. Other individuals who work or have worked within the organisation, such as former staff, volunteers, the self-employed and contractors, are also encouraged to use it.

2.2 For the purpose of this policy, Global Foundation (NPF) recognises that whistleblowing is the passing on of information about wrongdoing at work. The whistleblower must reasonably believe that they are acting in the public interest.

2.3 The statutory categories for wrongdoing are:

- a criminal offence (such as insurance fraud or illegal tax evasion)
- a breach of any legal obligation
- a miscarriage of justice
- endangering an individual's health and safety
- damage to the environment
- deliberate concealment of information about any of the above.

2.4 Examples of wrongdoing might include (but are not restricted to):

- unsafe working conditions
- lack of, or poor, response to a reported safety incident
- inadequate induction or training for staff
- suspicions of fraud
- a bullying culture (across a team or organisation rather than individual instances of bullying).

2.5 It is not necessary for the member of staff to have proof that wrongdoing is being, has been, or is likely to be committed. A reasonable belief is sufficient to disclose the concern. The member of staff has no responsibility for investigating the wrongdoing. It is the organisation's responsibility to ensure that an investigation takes place.

2.6 A member of staff who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

2.7 Nigel Prosser Foundation (NPF) recognises that any so-called 'gagging' or confidentiality clauses in settlement agreements or non-disclosure agreements with individuals do not prevent members of staff from making disclosures in the public interest and are void in such circumstances.

2.8 If the wrongdoing that the staff member wants to disclose is not included in the list above, advice may be sought from the designated officers (see section 4 below) or from a trade union representative on the use of the appropriate policy.

2.9 This policy is not for staff with concerns about their employment that affect only them – that type of concern is better suited to the grievance policy which can be found in the Policy Handbook.

2.10 This policy will be reviewed annually from date of issue by the designated officer/s (see section 4 below) in conjunction with the senior management team and trade union representatives. Where review is necessary due to legislative change, this will happen immediately.

3. Roles and Responsibilities

3.1 The Board of Trustees is responsible and accountable for this Whistleblowing Policy and Procedure. They will:

- demonstrate commitment to developing an open culture within the organisation, through actions and strategy
- receive and review annual reports on whistleblowing activity
- appoint designated officer/s.

3.2 All staff have a duty to report wrongdoing

- (whistleblowing) under the circumstances set out in section 2 of this policy.
- 3.3 Line managers are responsible for:
- ensuring all staff are aware of this policy and procedure and their responsibilities
 - investigating issues raised promptly and thoroughly
 - fostering an open culture within their teams
 - ensuring any whistleblower is not subject to detriment
 - escalating issues and engaging the support of designated officer/s where required.
- 3.4 Designated officer/s (see below) have lead responsibility for the whistleblowing procedure and for dealing with issues raised. They will:
- oversee and review the whistleblowing policy and procedure
 - providing advice and support to managers and employees
 - ensure learning from whistleblowing cases is fed back to the wider organisation
 - ensure managers are trained in dealing with issues
 - investigating issues raised with them directly promptly and thoroughly
 - informing all reported disclosures to the senior management team and the actions being taken
 - ensure the process is monitored and improved where required
 - provide reports on whistleblowing activity on an annual basis to the senior management team.

4. Whistleblowing Champions

- 4.1 The following people have been nominated and agreed by Nigel Prosser Foundation (NPF) as designated officers for concerns under this procedure: Suzanne Colley and Emma Perks.
- 4.2 These designated officers will act as an independent and impartial source of advice to staff at any stage of raising a concern, with access to anyone in the organisation.
- 4.3 All these people have been given special responsibility and training in dealing with whistleblowing concerns and will give you information about where you can go for more support. They will:
- treat the concern confidentially unless otherwise agreed
 - ensure the staff member receives timely support to progress their concern
 - escalate to senior management any indications that the staff member is being subjected to detriment for raising their concern
 - remind the organisation of the need to give the staff member timely feedback on how their concern is being dealt with
 - ensure the staff member has access to personal support as it is recognised that raising such a concern may be stressful.

5. How to raise a concern

- 5.1 In many circumstances, the easiest way a member of staff can get their concern resolved will be to raise it formally or informally with their line manager who should report it to the designated officer.
- 5.2 If this is not appropriate as the concern relates to the line manager, or if the member of staff does not feel able to raise it with them or if raising it with their line manager does not resolve matters, the member of staff can approach a designated officer directly. The designated officer will then confirm how the matter will be investigated.
- 5.3 If, for any reason, the member of staff does not feel comfortable raising their concern internally, they can raise concerns externally with 'prescribed bodies' (see section 8 below) if they feel this is necessary and in the public interest.
- 5.4 Concerns should be raised in writing (including email). The letter should set out the background and history of the concerns, giving names, dates and places where possible, and the reason why the member of staff is making the disclosure. If the individual does not feel able to make the disclosure in writing, an interview will be arranged.
- 5.5 When any meetings are arranged with an individual who is making or has made a protected disclosure, they have a right to be accompanied by a trade union representative. The meeting can be off site if requested.
- 5.6 The employee raising concerns does not have to prove the allegation, but they must demonstrate that there are sufficient grounds for concern.
- 5.7 If the member of staff wants to raise the matter in confidence, they should please say at the outset so that appropriate arrangements can be made.
- 5.8 Confidentiality will be maintained as far as is possible. It is guaranteed at the point of making a protected disclosure and will be maintained throughout the investigation and hearings, other than when a disclosure of identity is needed due to cross examination of the staff member as a witness to any subsequent procedure, or is required by law.
- 5.9 It is best to raise a concern openly, because that makes it easier for Nigel Prosser Foundation (NPF) to follow it up. Nigel Prosser Foundation (NPF) will not disclose the whistleblower's identity without their consent unless there are legal reasons that require them to do so. This might be, for example, where their information is about a child or vulnerable adult who is at risk, or where there is a possible criminal offence. If this is the case, Nigel Prosser Foundation (NPF) may have to tell the police or another official body, or if required to do so by a court. Nigel Prosser Foundation (NPF) will let the individual know if it must do this and that this will identify them to another body.
- 5.10 Staff may, if they wish, disclose information anonymously. However, it should be noted that in such circumstances, Nigel Prosser Foundation (NPF) will not be able to contact staff to discuss their concern or ask them for further information, nor will they normally be able to give any feedback about any action it takes, although anonymous

whistleblowers may seek feedback through a telephone appointment or by using an anonymised email address.

6. How Nigel Prosser Foundation (NPF) will respond

- 6.1 Any concern raised under this policy will be investigated thoroughly, promptly and confidentially.
- 6.2 Any approach to line managers and designated officers will be treated with the strictest confidence and the member of staff's identity will not be disclosed without their prior consent. All members of staff will always be treated with respect and the person raising the concern will be thanked.
- 6.3 There may be a meeting with the member of staff raising the concern to ensure Nigel Prosser Foundation (NPF) understands exactly the nature of the worry.
- 6.4 When any meetings are arranged with an employee who has made a protected disclosure, they have a right to be accompanied by a trade union representative. The meeting can be off site if requested.
- 6.5 When an individual makes a disclosure, the organisation will process any personal data collected as part of the investigation in line with Nigel Prosser Foundation (NPF)'s data protection policy which can be found in the Policies Handbook, ensuring the data is stored securely and only accessed by those individuals essential for dealing with the disclosure.
- 6.6 Within five working days of a concern being raised, the line manager or designated officer who received the disclosure will write to the member of staff setting out the following:
 - Acknowledgement that the concern has been received, the date it has been received, whether the person who raised the concern has requested confidentiality, and a summary of the concern
 - Indicating how the matter will be dealt with and by whom and how they can be contacted
 - Telling the member of staff when an investigation has or is to be started and if further assistance will be needed from them.
- 6.7 The member of staff who raises the concern will be told how long to expect the investigation to take and will be kept up to date with its progress.
- 6.8 The matters raised may be investigated internally. Where it has not been possible to resolve the matter quickly (usually within a few days) with the line manager, someone suitably independent (such as a designated officer) and properly trained will carry out an investigation.
- 6.9 The investigation will be objective and evidence-based and will produce a report that focuses on identifying and rectifying any issues and learning lessons to prevent problems recurring. The investigator may decide that the concern would be better looked at under another process, such as the grievance procedure or dignity at work procedure. If so, this will be discussed with the member of staff.

6.10 If misconduct is discovered because of any investigation under this policy, the disciplinary policy and procedure will be invoked in addition to any external measures.

6.11 On conclusion of any investigation, the member of staff will be told the outcome of the investigation and what Nigel Prosser Foundation (NPF) has done, or proposes to do, about it. Wherever possible, Nigel Prosser Foundation (NPF) will share the full investigation report with the member of staff who raised the concern (while respecting the confidentiality of others). If no action is to be taken, the reason for this will be explained.

6.12 If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to the Chair of the Board of Trustees who will arrange any further investigation as he/she thinks appropriate. The Chair of the Board of Trustees will send a written response to the individual concerned.

6.13 More serious disclosures may be referred to an external prescribed person or body and may form the subject of an independent inquiry.

6.14 In the event of an inquiry, where possible the trade union representatives will be consulted on the drawing up of terms of reference for any inquiry panel, as well as being involved in the implementation of any inquiry recommendations.

7 Harassment and victimisation

7.1 Nigel Prosser Foundation (NPF) understands that raising a concern can be difficult for staff, especially if they fear reprisal from those responsible for the malpractice. Nigel Prosser Foundation (NPF) will not tolerate harassment and victimisation of anyone raising a concern, and there should be no impact on the continued employment and opportunities for future promotion or training of anyone raising a concern. Any such behaviour is a serious breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.

7.2 Nor will Nigel Prosser Foundation (NPF) tolerate any attempt to bully anyone into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.

7.3 This policy encourages members of staff to put their name to their concerns. Concerns expressed anonymously are harder to follow up and have an effective outcome.

7.4 If a member of staff makes an allegation in good faith, but the allegation is not confirmed by the investigation, no action will be taken against that member of staff. They will not be at risk of losing their job or suffering any form of reprisal as a result. Provided the member of staff is acting honestly, it does not matter if they are mistaken or if there is an innocent explanation for their concerns.

8. Reporting a concern to an external body

8.1 This policy is intended to provide a route by which

members of staff can raise concerns internally. However, if an employee is unhappy with the outcome of an investigation or if, for any reason they do not feel comfortable raising their concern internally, they are free to take the matter outside of the organisation to a prescribed person or body or to their Member of Parliament (MP).

- 8.2 The full list of prescribed persons and bodies can be found on the UK government website at www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies. They include
- HM Revenue & Customs
 - the Comptroller and Auditor General
 - the Director of the Serious Fraud Office
 - the Charity Commission for England and Wales
 - the Information Commissioner
 - the Equality and Human Rights Commission
 - the Health and Safety Executive
 - the Care Quality Commission
 - the Environment Agency.

9. More information and support

- 9.1 Protect is the UK's whistleblowing charity that aims to stop harm by encouraging safe whistleblowing. They provide a legal advice service we offering free expert and confidential advice on how best to raise a concern and protection as whistleblower.
<https://protect-advice.org.uk>
Protect Advice Line: whistle@protect-advice.org.uk
Protect Advice Line: 020 3117 2520 (* option 1)
- 9.2 UK government advice on 'Whistleblowing for employees'
www.gov.uk/whistleblowing
- 9.3 Acas guidance on 'Whistle-blowing – Public Interest Disclosure'
<https://archive.acas.org.uk/index.aspx?articleid=1919>

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Grievance and Disciplinary Procedures

v1.0 November 2024

Grievance Procedure

If you have a grievance or complaint about your work or someone you work with you should start by speaking with your manager wherever possible. You may be able to agree a solution informally between you.

Formal grievance

If the matter is serious or you wish to raise it formally you should put the grievance in writing to your manager. You should keep to the facts and avoid language that is insulting or abusive.

If your grievance is against your manager and you feel unable to approach them, you should raise it with the Board of Trustees.

Grievance hearing

Your manager will call you to a meeting, usually within 5 working days, to discuss your grievance. You have the right to be accompanied by a colleague or trade union representative.

After the meeting your manager will give you a decision in writing, usually within 24 hours.

If the manager needs more information before making a decision, they will inform you of this and the timescale.

Appeal

If you are unhappy with the decision on your grievance you can raise an appeal. You should tell your manager.

You will be invited to an appeal meeting, normally within 5 working days, with a member of the Board of Trustees. You have the right to be accompanied by a colleague or representative.

After the meeting the manager (or Trustee) will give you a decision, usually within 24 hours. The manager's (or Trustee's) decision is final.

Disciplinary procedure

We will use this procedure to help and encourage all employees to achieve and maintain standards of conduct, attendance and job performance.

This procedure applies to all employees. The aim is to ensure consistent and fair treatment for all in the organisation.

A disciplinary process can be stressful for everyone involved. Different people might respond differently to stressful situations. We understand the prospect of disciplinary action might cause distress and affect your mental health. We will support you throughout to help avoid this happening to you.

Principles

We will consider informal action, where appropriate, to resolve problems. We will not take disciplinary action against you until the case has been fully investigated.

For formal action we will advise you of the nature of the complaint against you and we will give you the opportunity to state your case before any decision is made at a disciplinary meeting.

We will provide you, where appropriate, with written copies of evidence and relevant witness statements before a disciplinary meeting.

You will not be dismissed for a first breach of discipline, except in the case of gross misconduct, when the penalty is dismissal without notice and without payment in lieu of notice. You have the right to appeal against any disciplinary action.

The procedure may be used at any stage if your alleged misconduct needs this.

Your right to be accompanied

You have a statutory right to be accompanied by a companion where a disciplinary meeting could result in:

- a formal warning
- some other disciplinary action
- confirmation of a formal warning or other disciplinary action (for example, at an appeal hearing)

The right is to be accompanied by:

- someone you work with
- a member of the Board of Trustees
- a representative who's certified or trained in acting as a companion

You should tell us as soon as possible if you would like a companion and who they will be so we can make arrangements in good time.

The procedure

First stage of formal procedure

This will normally be either:

- an improvement note for unsatisfactory performance if performance does not meet acceptable standards. This will set out the performance problem, the improvement that is required, the timescale, any help that may be given and the right of appeal. We will advise you that this is the first stage of the formal procedure. We will keep a record of the improvement note for [number of months], but it will then be considered spent – as long as you achieve and maintain satisfactory performance

or

- a first warning for misconduct if conduct does not meet acceptable standards. This will be in writing and set out the nature of the misconduct, the change in behaviour required and the right of appeal. The warning will also tell you that a final written warning may be considered if there is no sustained satisfactory improvement or change. We will keep a record of the warning, but it will be disregarded for disciplinary purposes after [number of months]

Final written warning

We might give you a final written warning if:

- the offence is sufficiently serious
- there is further misconduct
- there is failure to improve performance while you're still under a prior warning

This will confirm the full details of the complaint, the improvement required and the timescale. It will also warn that failure to improve may lead to dismissal (or some other action short of dismissal) and will refer to the right of appeal.

A copy of this written warning will be kept by Nigel Prosser Foundation but it will be disregarded for disciplinary purposes after six months, as long as you achieve and maintain satisfactory conduct or performance.

Dismissal or other action

If there is still further misconduct or failure to improve performance the final step in the procedure may be dismissal or some other action short of dismissal such as demotion or transfer (as allowed in the contract of employment).

Dismissal decisions can only be taken by the Board of Trustees.

You will be provided in writing with the:

- reasons for dismissal
- date your employment will end
- confirmation of all final payments you are owed, including holiday pay and notice pay
- right of appeal

If an action short of dismissal has been decided on, you will:

- receive confirmation of the full details of the complaint
- be warned that dismissal could result if there is no satisfactory improvement
- be advised of the right of appeal

A copy of this written warning will be kept by Nigel Prosser Foundation but it will be disregarded for disciplinary purposes after six months, as long as you achieve and maintain satisfactory conduct or performance.

Gross misconduct

The following list provides some examples of offences which are normally regarded as gross misconduct:

- theft or fraud
- physical violence
- bullying
- deliberate and serious damage to property
- serious misuse of an organisation's property or name
- deliberately accessing internet sites containing pornographic, offensive or obscene material
- serious insubordination
- discrimination, harassment or victimisation
- bringing the organisation into serious disrepute
- causing loss, damage or injury through serious negligence
- a serious breach of health and safety rules
- a serious breach of confidence

We might consider suspending you while carrying out a disciplinary investigation if there's a serious issue or situation. Suspension is when we tell you to temporarily stop working. You would be on full pay throughout any suspension period.

We will consider each situation carefully before deciding to suspend you. Suspension will not be needed for most investigations. Suspension does not mean you have done anything wrong and will not be used to discipline you.

We understand being suspended might be stressful so we will:

- only suspend you if there's no other option
- support you throughout the suspension period, always considering your mental health and wellbeing

Appeals

If you want to appeal against a disciplinary decision you must do so within five working days. The Board of Trustees will hear all appeals and their decision is final. At the appeal any disciplinary penalty imposed will be reviewed.

Version control - Approval and review

Version No.	Approved by	Approval date	Main changes	Review period
1.0	Board	November 2024	Initial draft approved	Annually



Equality, Diversity and Inclusion Policy

v1.0 November 2024

Nigel Prosser Foundation is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The organisation – in providing goods and/or services and/or facilities – is also committed against unlawful discrimination of customers or the public.

Policy purpose

This policy's purpose is to:

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

Our commitments

The organisation commits to:

1. Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense
2. Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public

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

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

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

4. Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
5. Make decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
6. Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

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

Agreement to follow this policy

The equality, diversity and inclusion policy is fully supported by the Board of Trustees.

Our disciplinary and grievance procedures

Details of the organisation’s grievance and disciplinary policies and procedures can be found within the Policy Handbook. This includes with whom an employee should raise a grievance – usually their line manager.
Use of the organisation’s grievance or disciplinary procedures does not affect an employee’s right to make a claim to an employment tribunal within three months of the alleged discrimination.

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1.0	Board	November 2024	Initial draft approved	Annually



Data Protection Policy

v1.0 November 2024

Data Protection Principles

Nigel Prosser Foundation 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;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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
- f. 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."

General provisions

- This policy applies to all personal data processed by the foundation.
- The Responsible Person (Board of Trustees) shall take responsibility for the foundation's ongoing compliance with this policy.
- This policy shall be reviewed at least annually.

Lawful, fair and transparent processing

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

Lawful purposes

All data processed by the foundation will be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

Data minimisation

Nigel Prosser Foundation shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy

Nigel Prosser Foundation shall take reasonable steps to ensure personal data is accurate. 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.

Security

- Nigel Prosser Foundation shall ensure that personal data is stored securely.
- Access to personal data shall be limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- When personal data is deleted it is done so safely and such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions are in place.

Breach

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 foundation shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

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Environmental Policy

v1.0 November 2024

Statement of intent

Nigel Prosser Foundation acknowledges the connection between the climate and environmental crises; the threat of current and future homelessness, disease, food and water shortages, and poverty for millions of people around the world. As well as the major damage being caused to the natural world

Nigel Prosser Foundation therefore recognise our responsibility to reduce our carbon and environmental footprints and commit to being an environmentally responsible foundation.

To achieve this we commit to the following actions:

Our commitment

- Nigel Prosser Foundation is committed to becoming an environmentally responsible organisation.
- The Board of Trustees and all employees are expected to help Nigel Prosser Foundation in carrying out its aim of being an environmentally responsible organisation, in how they carry out their day-to-day duties.
- Nigel Prosser Foundation will observe existing environmental legislation as a minimum standard and seek to out-perform current legislative requirements where practical.
- Nigel Prosser Foundation will seek to reduce unnecessary travel and making the transport that is necessary as sustainable as possible.
- Nigel Prosser Foundation will strive to become a role model for good environmental working practises and will share any knowledge and experience gained in how to achieve this, with other organisations.
- Nigel Prosser Foundation will review any owned or rented properties or offices, to establish their carbon footprint and take measures to address any areas of improvement that are needed to achieve low or zero carbon status.

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Tainted Charity Donations Statement

v1.0 April 2026

Statement of intent

Nigel Prosser Foundation is committed to maintaining the highest standards of governance, transparency and legal compliance in relation to all donations received.

The Foundation will monitor all donations, fundraising arrangements and associated transactions to ensure that tainted charity donations do not occur.

Under Schedule 3 of the Finance Act 2011, the Tainted Charity Donations rules were introduced to prevent abuse of charitable tax reliefs. These rules apply where a taxpayer donor enters into arrangements designed to obtain a financial advantage from a charity, or for someone connected with them, in return for making a donation.

Where such arrangements exist, the normal tax reliefs available to donors may be denied.

Donations Not Normally Affected

The Tainted Charity Donations rules do not generally apply to:

- A straightforward donation to charity where no additional arrangements are entered into
- Donations made under Gift Aid that remain within permitted Gift Aid benefit limits
- Donations where any donor benefit has already been taken into account when calculating relief for gifts of shares, securities, real property or trading stock

Nigel Prosser Foundation Approach

To protect the charity, its donors and beneficiaries, Nigel Prosser Foundation will:

- Review significant or unusual donations where appropriate
- Consider any linked arrangements, benefits or transactions connected to donations
- Seek professional advice where necessary
- Maintain clear financial records and governance procedures
- Decline donations or arrangements that may compromise compliance, reputation or charitable integrity

Our Commitment

Nigel Prosser Foundation values the generosity of all supporters and welcomes genuine charitable donations made in good faith to support our charitable objectives. We will continue to ensure that all donations are accepted and managed in accordance with HMRC guidance, charity law and best practice.

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