

WARLEY WOODS COMMUNITY TRUST

POLICIES AND PROCEDURES

The Pavilion
101 Lightwoods Hill
Smethwick, West Midlands
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Charity Number 1092754
Company Number 04214547

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1 INTRODUCTION

1.1 Warley Woods Community Trust (WWCT)

Warley Woods, located in Smethwick, has been an important part of the community for more than 100 years, with the history of this beautiful green space going back at least 500 years. The park was purchased by public subscription in 1906 to save it from housing development. Since that time it has been managed by Birmingham City Council, although within the Borough of Sandwell.

Warley Woods Community Trust was formed to restore and manage Warley Woods Park as an asset for the local community. It is a registered charity, managed by a volunteer board of between 10 and 15 local residents and has a growing membership of more than 900, many of whom volunteer to help maintain the beauty of the park. Julie Walters, Professor Carl Chinn, Colin Buchanan and Stuart Maconie have kindly agreed to be our patrons.

The Community Trust was set up in 1996, following local interest and concern about the park. At this time the Heritage Lottery Fund established a fund to restore urban parks. With the help of officers from Sandwell council, residents put together a bid to restore the park to its former glory, and this was finally accepted in 1999.

Following a period of negotiation WWCT took over the management of the park in 2004 on a 99 year lease. The HLF supported restoration project was completed in 2007, alongside a BLF project and we now run the park on the income from the golf course, a financial contribution from Sandwell MBC and a range of fundraising activities.

1.2 Vision of the Warley Woods Community Trust

The vision of the Warley Woods Community Trust is:

- 🌱 To secure the long- term restoration and care of Warley Woods as a diverse, ecologically rich park and woodland, based on Humphry Repton's original design principles.
- 🌱 To continue the tradition of The People's Park as an accessible, safe, welcoming and healthy environment which is a central focus for the local community.
- 🌱 To draw upon the qualities of this unique landscape to promote recreation, education and pleasure for all.

1.3 Charitable Objectives

The Charitable Objectives of the Warley Woods Community Trust are:

- 🌱 To promote the conservation, protection and improvement of the physical, natural and historic environment of the area known as Warley Woods
- 🌱 To provide recreational facilities for the public at large or those who by reason of their youth, age, infirmity or disability, poverty or social and economic circumstances, have need of such facilities in the interests of social welfare.
- 🌱 To advance public education, in particular but not exclusively, by the provision of facilities to study the historical, archaeological, environmental and horticultural importance of the area known as Warley Woods.

1.4 Purpose of Policies and Procedures

The purpose of the policies and procedures is to outline a code of behaviours and acceptable activities associated with Warley Woods Community Trust.

1.5 Governance: Board roles and responsibilities

The role of the WWCT Board of Directors is to provide sound management direction related to, but not exclusive to, all financial decisions, staffing and volunteers.

Responsibilities of the Board of Directors are:

- 🐼 To make collective decisions based on constructive discussion regarding the management of the park
- 🐼 To make sound financial decisions regarding fundraising, purchasing and all other accounting matters
- 🐼 To guide staff and volunteers to implement Board decisions

Individual responsibilities:

- 🐼 Offer insight and opinion on various issues related to the effective management of the park
- 🐼 To openly coordinate with other Board members regarding park-related tasks
- 🐼 To contribute sufficient time to WWCT duties to be effective as a trustee and keep up to date on the key priorities
- 🐼 Apply their skills and knowledge to support WWCT
- 🐼 To adhere to the policies and procedures set out by WWCT

2 FINANCE AND ACCOUNTING

2.1 Purchasing

The goal of Warley Wood Community Trust in every purchasing transaction is to acquire the best value possible; a combination of price, quality, reliability, service, and delivery terms.

Warley Woods Community Trust strives to procure all goods and services through the use of appropriate contracts, and terms and conditions to protect both buyer and seller. Acquisitions will be conducted on an open and competitive basis and without favouritism in order to obtain the maximum value for each expenditure. Interested suppliers will receive fair and impartial consideration.

Tenders or comparative quotes should be sought for any contract or purchase exceeding £5,000 and comparative quotes should be sought for any contract or purchase exceeding £3,000 unless specifically authorised by the Board. Where prices are comparable then preference should be given to local suppliers. All purchases should be made with reference to the Environmental Policy.

For purchases made with funds from grants, any grant conditions with regard to purchasing should be followed.

2.2 Ethical Conduct

Ethical business standards shall govern all procurement transactions. Infractions of this procurement policy are to be reported to Chair of the Board, the Vice Chair and/or the Trust Manager. Disciplinary action for those violating ethical business standards will be taken.

A business entity in which an employee or Board member has an economic interest represents a conflict of interest if the employee or Board member has any involvement in the selection of that entity as a WWCT vendor. An economic interest includes a relative's ownership or partnership in the business, including serving as stockholder, director, or officer in a non-publicly held company. Engaging a relative as an independent contractor is also a conflict of interest. Conflict of interest is avoided if the employee or Board member brings a supervisor, Chair, Vice Chair or Treasurer into the decision to engage the vendor. Such a conflict and the arrangement to avoid it must be documented and approved by the Chair of the Board.

WWCT requests and offers confidentiality from/to its suppliers. All quotations, proposals, suggestions, and proprietary information are to be held in the strictest confidence. Proprietary information exchanged during transactions shall be identified and treatment of that information clearly agreed upon by both WWCT and the supplier.

2.3 Authority and Responsibility

An annual overall budget and set of budgets assigned to headings are agreed by the Board before the beginning of the financial year. Budget holders are able to spend up to the limit of these budgets and are asked to spread costs throughout the year to preserve positive cash flow. Budgets should be discussed with budget holders to ensure they are adequate for their needs.

- 🕒 The Trust Manager has overall responsibility for all budget lines.
- 🕒 The Golf and Retail Development Manager can spend against the golf accessories budget, shop staff budget and non golf merchandise for sale.
- 🕒 The Golf Course and Park Manager can spend against the course improvement, fuel, servicing and maintenance, course materials and park maintenance budgets.

- 🕒 The Administrator can spend against any budget line when requested by the budget holder. They can spend against the events, postage and stationery budgets and make purchases for the cleaning staff and groundstaff.
- 🕒 All trustees or members of staff can authorise expenditure when the issue relates to emergencies or the safety of members of the public.
- 🕒 Tree works should only be authorised by Trust Manager or the Golf Course and Park Manager.
- 🕒 All members of staff can make small purchases of up to £50 in value without prior authorisation, although it is recommended practice to get approval in advance.
- 🕒 Authorising of hourly paid staff can be authorised by any bank signatory, but should be subject to checks by Trust Manager and Retail Manager.

Procedure

Expenditure

- 🕒 All delivery notes should be kept to be checked with invoices before payment.
- 🕒 All invoices should be stamped with the processing record stamp before passing for payment.
- 🕒 Budget holder should approve (initial) invoices before payment and enter the relevant Sage department code.
- 🕒 Any purchases made with personal money should be claimed back through an expense claim form, or through a petty cash claim.
- 🕒 Only purchases for Warley Woods Community Trust should be made on a corporate credit card.
- 🕒 All invoices should be solely for Warley Woods Community Trust and should not be split between organisations or individuals. If necessary an invoice should be raised to reclaim money from other parties.
- 🕒 All cheques made out should have supporting paperwork.
- 🕒 All cancelled cheques should be kept. Cancelled and stapled to the relevant cheque stub.
- 🕒 All petty cash/till transfers for warehouse purchases should be countersigned by the Trust Manager or Treasurer.
- 🕒 Making personal purchases with Trust funds should be avoided whenever possible. Should this happen then an identifiable record of the reimbursement should be made through the till
- 🕒 All invoices, claim forms, cheque stubs, payment receipts should be kept in the office for immediate inspection on request.
- 🕒 All cash payments to members of the public should be signed for and a note should be made of their address. This applies to any cash payments made from the till, for sales of equipment, cash refunds and transfer of cash for sales. The Retail Manager is responsible for processing payments to third parties for sales or purchases. The Administrator is responsible for petty cash payments.
- 🕒 Any expenditure made purely for golf business made on budget lines shared between Trust and Golf should be marked to ensure maximum VAT reclaim,
- 🕒 No member of staff or trustee should authorise payments to themselves. Petty cash sheets should be signed by another authoriser. Cheques and bank payments, including salaries, should be initiated and authorised by two other signatories.
- 🕒 Regular suppliers, including utility companies, should be kept under review to ensure rates are competitive. Particular focus should be paid to this from December – March when preparing the budgets for the next financial year or at end of contract dates.

- 🕒 Any expenditure which would lead to a significant overspend on a budget line or which constitutes a new project or development rather than day to day operations, should be referred to the Treasurer before orders are placed.
- 🕒 Any expenditure to members of staff beyond regular wages, salary or reimbursement should be referred to the Treasurer before agreement.
- 🕒 Any unusual expenditure or arrangements with suppliers or contractors should be accompanied by written explanations.

Income

The majority of income comes from grants and donations and is not invoicable. When invoices are used they should be numbered, include the VAT number and copies kept on file. Receipts should be offered for all donations and sales, unless donations are put into a sealed charity box.

Stock Control

Items for sale in shop should be subject to quarterly stock control procedures.

2.4 Monitoring

A monthly income report is taken run from OSWALD, annotated by the Trust Manager and passed to the bookkeeper. This, along with all expenditure, is entered onto Sage Accounting during the current month by the bookkeeper and should appear on the monthly report to the Board, created by the Trust Manager. This report allows Trustees to monitor ongoing income and expenditure and to be able to ask questions to drill down to more detail if required.

All salary payments are input by the Bookkeeper and should be checked for accuracy and completeness before authorisation. Corporate Credit Card statements should be checked by the Trust Manager. The Trust Manager's Credit Card statements should be checked by The Treasurer.

2.5 Inventory

All equipment, tools and other purchased items over £500, or where it is a requirement of grant funding, upon delivery must be entered into an inventory database. The Administrator enters the purchase into the database provided by the Treasurer of the Trust for staff and Board members.

2.6 Income Generation

Income generation is critical to the long-term sustainability of Warley Woods Community Trust.

Warley Woods Community Trust generates income through:

- 🕒 Golf course fees
- 🕒 Membership fees
- 🕒 Facilities fees
- 🕒 Donations from businesses and individuals
- 🕒 Trading
- 🕒 Funding from the government, regional agencies and charitable bodies.

Income generation principles

- 🕒 All events should seek to cover costs at a minimum.
- 🕒 All items selected for trading should normally be able to return a profit of at least 25%.
- 🕒 Membership fees should cover the cost of administering membership, membership costs and AGM costs.
- 🕒 All income generation must be in accordance with WWCT's aims, values and objectives and must not compromise operational integrity.

2.7 WWCT Procedure for managing collected donations

Background

Collecting tins are a way of signposting the work of the Trust and collecting small donations. Collecting tins includes donation posts, buckets and purpose designed boxes.

As cash is involved in these transactions every care should be taken that it is all correctly accounted for.

Collecting tins in the community

The Trust has a number of collecting tins that are clearly labelled with the Trust logo and charity number and have seals placed on them when issued to show that they have not been opened on their return.

Control of the tins

- The resources sub group will allocate a volunteer to take a tin to a location. The volunteer will be responsible for negotiating with the holder of the tin at the designated collecting point to place the tin there and its location, the duration it will be there, the return date (and means of collecting them) and contact numbers both for the holder and trust for any queries.
- The Administrator will keep a list of the volunteers that distribute tins, the location they are at, the return date and the amount of cash in the tin on its return. They will issue a thank you certificate for the volunteer to deliver or to post (as agreed with the volunteer)
- Normal practice will be for the tins to be issued for 3 months at a time. On the first exchange we would hope to swop the tins. If on return of a tin it is found that the donations are very small then the resources sub group will consider if we wish to place another tin their or “abandon” that collection point when the current tin is recovered.
- The resources sub group will routinely check the location and timings for the issue and return of the tins every three months.
- Tins are opened outside of the meeting and money banked following the procedures for this.

Donation posts

These are checked once week by staff and money banked through normal procedures.

Collecting buckets

These are used at events and are issued to volunteers. The buckets are sealed and opened after the event.

3 COMMUNICATIONS

Communications

Marketing and communications are the responsibility of the Communications Subgroup. The Subgroup is required to report regularly to the Board of Trustees. The Communications Subgroup is able to present papers for the consideration of the Board.

The Communications Subgroup is responsible for:

- 🕒 Agreeing subjects for monthly press releases for all park related events in conjunction with the Trust Manager.
- 🕒 Overseeing the timely production of the newsletter (The LEAFlet)
- 🕒 Logo and Branding decisions of WWCT (subject to Board approval)
- 🕒 Printed material production (i.e. posters, brochures etc.)
- 🕒 Production of Annual Report (requires final Board approval)
- 🕒 Overall plan for website content
- 🕒 Media interviews events in conjunction with the Chair of the Trust
- 🕒 Park Signage
- 🕒 User and Non User Surveys
- 🕒 Monthly Emails
- 🕒 Promotion of membership

All communication should be produced in as accessible format as possible and care should be taken when using colour contrasts of text and background. While it would not be practical for such a small organisation to automatically produce all publications in audio and Braille versions, this could be facilitated by QAC in Harborne if needed. Translations into other languages would be undertaken if a group requested this.

2.1 Logo Use and Branding

In an effort to ensure a positive and consistent graphic identity for WWCT the use of the logo and other graphical elements must be consistent. All printed publications, website materials and signage must contain the Trust's logo and a consistent group of typefaces and colours. No other graphic treatments should be presented as logos of WWCT.

Procedure

To ensure graphic integrity, authorised vendors and organisations that need to reproduce the official logo and other official graphics must obtain the mechanical or digital source material from WWCT office rather than attempt to recreate graphic material or copy from the internet. Images should not be disproportionately scaled. Stretching digital graphics horizontally or vertically in a computer application results in distortion that alters the design. Graphic elements should always contain enough resolution to image without discernible pixels on the output device (printer or monitor).

The WWCT logo should always appear on all of the following publications:

- 🕒 recruitment material for staff, members and volunteers
- 🕒 external publications
- 🕒 newsletters
- 🕒 stationery and business cards
- 🕒 press releases
- 🕒 all advertising
- 🕒 park signage

Letterhead must be used for all letters written for WWCT business.

2.2 Website

The website should reflect the visual branding used in printed publications. The website should be updated regularly to reflect upcoming events or other current affairs.

The website must be designed for generally accessible browser software suitable for browsing on mobile phones and tablets. Use of technologies that require plug-ins or that use features of one particular browser should be avoided or kept to a minimum. Links to plug-in download sites should be included in any site that requires additional software.

Procedure

The Trust Manager and Retail and Golf Development Manager are responsible for updating the website. They should ensure that information is up to date and accurate and that all events and activities are included in a timely fashion.

2.3 Social Media

The Trust has chosen Facebook and Twitter as its social media platforms. They are to be used to promote Warley Woods and the Trust and its programme of events. They are also to be employed to communicate and interact with members of the public.

Procedure

The Communications group is responsible for Social Media and its use. Responsibility for content and monitoring are delegated to staff, trustees and members. An identifiable number of people will have administration rights for Twitter and Facebook. See Appendix A below for detailed policy in the use of social media.

2.4 Quarterly Newsletter

The newsletter, The LEAFlet, is an important part of the WWCT communication strategy and contains important news items and informative content regarding Warley Woods. The newsletter is a tool to keep membership and the local community informed on events and activities in the park.

Procedure

The communications group should collectively agree the outline content for the next newsletter and appoint a co-ordinator/editor. A range of contributors should be sought and as many aspects of the Trust's work as possible should be covered in each issue. Deadlines for content should be agreed. The co-ordinator/editor should contact and remind contributors to ensure deadlines are met and the text is forwarded to the designer. Both the co-ordinator/editor and one additional person should proof the text before signing off for printing.

2.5 Email Newsletter and Group Email Communications

The Trust issues one email newsletter per month. The content is agreed with the Communications Subgroup. This generally contains news on upcoming activities and requests for support.

The Trust can use this email group for calls to action which require a response online. However it is policy not to overuse this email group, to ensure Trust communications do not become a nuisance or ignored.

The Trust has separate email groups for communicating extra news and requests to volunteers, Warley Wood members and a group for golf marketing.

Mailchimp is used for the most informational emails. All other group email communications should be blind copied to maintain the privacy of individuals. The exception to this rule is where individuals recognise their membership of a group, e.g. board, subgroup, biodiversity group or helpers at a particular event or activity to enable them to contact each other.

2.6 Publications

Publications developed by the Communication group or employees must have a clear purpose. Publications must be reviewed by at least two people. All major publications should be brought to the attention of the Board for comment and approval before production.

2.7 Signage

Signage within the park is kept to a minimum to ensure the landscape remains uncluttered and to keep maintenance costs low. All messages should be stated in the positive, wherever possible and framed as requests. Signs must include the Trust's logo and the logo of any project funder. They should be sited on level ground or close to kerbs/paths to ensure all can be accessed easily.

2.8 Comments, Compliments and Complaints Policy

Customer Feedback and Consultation

Feedback

WWCT encourages and welcomes feedback, both complimentary and critical, from its users. Feedback is recorded, and monitored by staff and trustees to inform current and future practice.

Feedback can be both formal and informal. Channels for user feedback include:

-  E-mails and letters
-  Comments via the Trust's website
-  Verbal feedback given to staff
-  Facebook and Twitter
-  Research (e.g. User Survey, etc)

Verbal comments are recorded in a folder in the shop and paper/email comments are kept in a folder in the office. A summary of comments and suggestions received is given to the Trustees quarterly. Any issue requiring specific attention is monitored by the Trust Manager, and may be referred to the trustees for decision or action if required. Where feedback relates to an urgent practical issue (site maintenance) this is recorded in writing in the shop and progress logged.

2.9 Consultation

Feedback is used to inform future plans and decisions. The Trust also undertakes a Biennial Visitor Survey, and occasional resident/non user surveys and use the results to gain a better understanding of the needs and opinions of our users, and to inform future plans for the Trust.

Where further information on a specific issue is required, we may choose to undertake additional research.

Appendix A: Use of Social Media

This policy governs the publication of and commentary on social media, by employees and volunteers of Warley Woods. For the purposes of this policy, social media means any facility for online publication and commentary, such as (but not exclusively) Facebook and Twitter. This policy is in addition to and complements any existing or future policies regarding the use of technology, computers, e-mail and the internet.

Warley Woods employees and volunteers are free to publish or comment via social media in accordance with this policy. This policy also applies to personal accounts. All uses of social media must follow the same standards that Warley Woods' employees and volunteers must follow.

The Policy

Read and comply with the terms of use of any social media platform being used.

Beware of attempts to try to obtain passwords or user names from you that may compromise security of the Trust, you and others.

Ensure that any content you upload to any social media site does not infringe any intellectual property rights belonging to a third party. Be wary of reproducing third-party materials or extracts from materials. Linking to the source is often a safer option.

Ensure that all communications are grammatically correct, accurate, objectively justifiable, reasonable and appropriate for the intended audience. If you are in doubt as to what you can or cannot say then staff should seek advice from their line manager or for volunteers the Communications Sub Group.

It is acceptable to talk about your work and have a conversation with the community but it is not acceptable to publish confidential information. This includes things such as unpublished details about our software, details of current projects, financial information, research, and people's personal details. We must respect the wishes of our partner organisations regarding confidentiality. If in doubt, check with your line manager or Communications Group before publishing.

Privacy settings on social media platforms should be set to allow anyone to see profile information similar to what would be on the Warley Woods website. They should not allow others to post information or see information that is personal. Be mindful of posting information that you would not want the public to see. If in doubt, check with your line manager or Communications Sub Group before publishing.

Transparency and honesty are vitally important. On Facebook, use your real name on the Community Trust Page but it is anonymous on the corporate page and it is @WarleyWoods1 on Twitter.

1. Warley Woods trustees, employees, volunteers, members and the public in general reflect a diverse set of customs, values and points of view. Do not say anything abusive, inflammatory or that conflicts with the Trust's aims.
2. If you are not representing the Trust on social media make it clear that you are expressing a private opinion.
3. Partners should not be cited/identified or obviously referenced without their approval. It is acceptable to discuss details of work in general so long as it does not violate any non-disclosure agreements.
4. In the event that you receive criticism of your comments or Warley Woods consider carefully what should be the appropriate response. It may be better not to respond to negative comments than to say something that may have the effect of making the situation worse. If in doubt staff should speak to their line manager or for volunteers the Communications Group.
5. The Trust's social media platforms have administrators who have the right to delete or block comments and accounts. Constructive criticism of the Trust and its actions are acceptable but comments about individuals or the Trust are unacceptable. Administrators can also delete any advertising they see on social media. If in doubt they should contact the Communications Sub Group.
6. If you see misrepresentations made about Warley Woods in the media, you should bring them to the attention of your line manager or for volunteers the Communications Sub Group.
7. If you make an error acknowledge it and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so. If someone accuses you of posting something improper, such as copyright infringement, deal with it quickly - better to remove it immediately to lessen the possibility of a legal action. In all cases inform your line manager or the Communications Sub Group.
8. Many social media users include a prominent disclaimer saying who they work for, but that they're not speaking officially. This is good practice and is encouraged.
9. Make sure that use of social media does not interfere with your other work commitments.

10. Your use of social media in relation to Warley Woods may be monitored. For staff, policy violations may be subject to disciplinary action, which may result in the termination of employment.
11. In light of the fast changing nature of social media and its use the policy will be subject to periodic reviews.

4 EMPLOYEES

Recruitment

Vacancies will normally be advertised in the appropriate media: options include relevant newspapers and journals, Job Centre Plus, Trust Notice Boards and- the WWCT website. As a small organisation with limited opportunities for progression, vacancies may be advertised initially to current staff before, if necessary, going out to wider recruitment. Officer approval is needed for this process. Any internal candidate would need to achieve a predetermined score at interview for successful appointment.

An application pack including information about WWCT, the post, the job description and the person specification will be made available to potential applicants who will be asked to submit their application on the application form provided.

The sift and interview process will be carried out by a panel of up to 4 people against clearly defined criteria. The post will be offered subject to successful references with new recruits undertaking a probation period (length specified in contract).

Induction

All staff will have an initial induction to WWCT organised by their line manager. On their first day of employment they will be taken through the induction checklist which includes important issues relating to health and safety and safeguarding children and vulnerable adults. Induction should help them become effective in the role as quickly as possible, including the identification of any training they may need. There will be a review at the end of the probation period conducted by the line manager.

Job Descriptions

All staff will have a written job description setting out the key responsibilities of the role. This will be reviewed through periodic reviews.

Contract of Employment

An appointment pack, letter of appointment, induction and staff policies constitute WWCT's contract of employment.

Pensions

WWCT offers an autoenrolment scheme and extends this offer to staff who do not qualify for autoenrolment but who have a permanent contract and work over 10 hours a week.

Annual Leave, Bank Holidays and TOIL

The annual leave year for each employee runs in line with their start date. All leave should be booked through the line manager in advance, giving 1 month notice for periods of 1 week or more and notice of 1 week for shorter periods. If holidays clash, this will need to be resolved, by line managers, before holidays can be approved. All leave is subject to approval and travel should not be booked until approved. Leave will be agreed on a fair share basis, not necessarily first come first agreed. Staff are allowed to carry forward up to 10 days of annual leave without additional approval.

Where an employee is required to work on a bank holiday, evening or weekend outside of their normal working hours time off in lieu (TOIL) will be taken with the agreement of the line manager. Part-time shop staff will not be given TOIL for bank holidays where these fall on their normal working day. Staff may take compassionate leave of up to five days on the death of close relative, with the agreement of their line manager.

Timesheets

Employees are required to fill in timesheets and to account for time off in lieu.

Absence

All absences must be reported to the appropriate line manager by their expected start time. Staff should give a clear reason for their absence and give notice of their intended date of return. They should keep their line manager informed about any extension beyond this date. Any un-notified absence will be taken from annual leave. Persistent absenteeism could lead to disciplinary action. See Appendix E for full absence policy and procedures.

Dental and Medical Appointments

Where possible these should be made outside of working hours. Where this is not possible the employee should request permission to keep the appointment giving as much notice as possible. Time should be made up on another occasion, or taken from TOIL.

Training and Development policy

WWCT is committed to providing skills training and development for employees. Following from this, WWCT is committed, within budgetary constraints, to provide its staff with appropriate training, developmental and educational opportunities that will enable them to acquire the skills and competencies that are needed by the organisation and for their own professional development.

Full details of our training and development policy can be found at Appendix B to this section.

Equal treatment policy

It is the policy of WWCT to ensure equal treatment for all qualified persons and not discriminate against any employee or prospective employee because of any of the protected characteristics of the Equality Act 2010: namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation

This policy applies to recruitment, placement, promotion, training, transfer, retention, rate of pay and all other details and conditions of employment. Employment decisions will be based on merit and the principle of furthering equal opportunity. The requirements imposed in filling a position will be those that validly relate to the job performance required.

Harassment and Discrimination

WWCT believes in the necessity of providing safeguards for its employees against harassment and discrimination. This includes harassment and discrimination on the basis of any protected characteristic. It is the responsibility of all employees to contribute to the elimination of harassment and discrimination.

Full details of our policy on harassment and discrimination can be found at Appendix B to this section.

Complaints

Complaints against staff will be handled by the Trust Manager and the member of staff's line manager. Complaints against the Trust Manager will be handled by their appointed line manager.

The Complaint handler will contact the complainant to seek information and to inform them about the process that they will be following. The complaint handler may discuss the incident with the two parties, separately or together to attempt to find a solution. All incidents must be recorded to include names, dates, times, places and a thorough description of the incident

Normally a written complaint must be filed within six months of the incident complained of, or where the matter complained of consists of a series of related incidents, within six months of the most recent incident.

Discipline

Disciplinary rules and procedures are necessary for promoting fairness and order in treatment of individuals. Further details about the Trust's disciplinary procedures can be found at Appendix C to this section.

Grievance

If an employee has a grievance relating to employment it must be identified to their line manager, or to their line-manager if it is concerning them. If a satisfactory resolution cannot be reached the employee should refer it to the Vice Chair or Chair of WWCT. A grievance can cover a wide range of problems and therefore a strict procedure may be difficult to follow. Each problem will be dealt with as an individual one and action taken accordingly.

Telephone calls

All private calls should be made and received on personal mobile phones. Staff should use their phones responsibly and they should not be allowed to interfere with the course of business.

Smoking, Alcohol and Drugs

WWCT is committed to providing its employees with a smoke-free work environment to protect the health and welfare of employees from the adverse effects of tobacco smoke from cigarettes, cigars, and pipes.

Smoking is strictly prohibited within all WWCT structures. This includes all meeting rooms, offices, hallways, public or reception areas, restrooms, employee lounges and storage sheds.

Smoking is prohibited in all areas where a safety hazard exists, such as storage and hazardous/flammable materials handling areas. Smoking is prohibited in all Warley Woods vehicles used for transporting any individuals on WWCT business.

WWCT realises that the misuse of drugs and alcohol impairs the health and productivity of employees. Drug and alcohol problems may result in unsafe working conditions. WWCT is committed to maintaining a productive, safe, and healthy work environment, free of illicit drug and unauthorized alcohol use.

Any employee involved in the unlawful use, sale, manufacturing, dispensing or possession of controlled substances (i.e. illicit drugs and alcohol) on Warley Woods premises or work sites, or working under the influence of such substances, will be subject to disciplinary action up to and including dismissal and referral for prosecution.

Private Property

The Trust accepts no liability for the loss of or damage to any private property (including cars and golf clubs) of any individual whilst on Trust premises or on Trust business.

Warley Woods Community Trust IT Code of Practice

Warley Woods Community Trust (WWCT) IT Code of Practice is based around three key principles

1. Protecting WWCT reputation
2. Using IT systems to enhance WWCT operations
3. Maintaining security and protecting WWCT IT systems

Full details of our IT code of practice can be found at Appendix D to this section.

APPENDICES

APPENDIX A

Training and Development policy

WWCT is committed to providing skills training and development for employees and to provide its staff with appropriate training, developmental and educational opportunities that will enable them to acquire the skills and competencies that are needed by the organisation and for their own professional development. Training needs will normally be identified during an employee's annual review, unless circumstances change that necessitate training.

In order to achieve these aims, WWCT undertakes to:

- Identify staff training and development needs in terms of necessary standards of competence, innovation, and personal aspirations;
- Set annual priorities in the light of these needs, given budgetary constraints;
- Provide appropriate and high-quality induction, training and development programmes for all staff;
- Ensure that all staff are informed of training and personal development opportunities;
- Monitor and evaluate the effectiveness of induction, training and development initiatives;
- Keep a record of the training received by each member of staff.

WWCT aims to ensure that:

- 🕒 Each member of staff understands exactly what is expected in their job and work context
- 🕒 Each member of staff has the opportunity to learn successfully perform their current job
- 🕒 Each member of staff is prepared for future challenges created by our business initiatives
- 🕒 Each member of staff is enabled to develop his/her potential

Line managers will review the impact of training on staff performance. Line managers will discuss training objectives with staff prior to the training and review the learning achieved following training. Managers should encourage staff to be totally involved in the creation of training plans.

There are key areas where training will be offered to all staff:

Induction Training

Line managers should assess the training needs of all new staff, or staff changing job roles, in order to help them perform to the standard required from the outset. She/he should design an induction programme to meet the specific needs of individuals. This then feeds in to the employee's first Annual Review.

All staff should be taken through the health and safety checklist and Safeguarding Children and Vulnerable Adults policy as part of their induction.

Existing Staff

Training in skills to enable a member of staff to do their job should continue to be a priority of WWCT. These skills must be relevant to the job and be part of the WWCT training plan.

Management Development

Management development is essential to the success of the Trust, managers will continue to focus on the competencies which are essential for them to acquire and practice in order to increase their effectiveness. Management development will take into account preparation for growth and change in the organisation.

Training and Qualifications

WWCT will fund training which has been agreed. Resources required for any training should be discussed with managers. Purchase of specific resources will be negotiated on an individual basis.

Full-time staff should manage their working commitments to accommodate training time. If the workload is such that this cannot be achieved, then staff should discuss this with their line manager and support will be negotiated.

Part-time staff should manage their working commitments to accommodate training where practicable but should be prepared to train on non-working days. TOIL will be given should this be necessary.

For NVQ qualifications staff should receive the standard number of hours of assessment time allocated to the particular NVQ. Additional assessment time must be negotiated with their manager. Portfolio development should be undertaken out of working hours.

In the event of staff leaving the Trust within 12 months of completion of training, then WWCT reserves the right to recoup the full cost of this training from the staff member. If staff leave WWCT between 12 months and 2 years of completion of training then WWCT reserves the right to recoup 50% of the cost of the training from the staff member. Discussion will take place between the staff member and their manager prior to the training to establish obligations.

APPENDIX B

Harassment and Discrimination

WWCT believes in the necessity of providing safeguards for its employees, volunteers and Board members against harassment and discrimination. This includes harassment and discrimination on the basis of any protected characteristic). It is the responsibility of all employees, volunteers and Board members to contribute to the elimination of harassment and discrimination.

It is the responsibility of all employees, volunteers and Board members to strive to create an environment free of harassment and discrimination. Included within the scope of that responsibility is an awareness of what constitutes harassment and discrimination based on human rights, knowledge of the procedures that are in place for dealing with allegations of harassment and discrimination, and cooperation in the processing of complaints made under this procedure.

It also means that supervisors will not condone or ignore activities within their areas of responsibility which violate the rights of employees or volunteers. It means that they will ensure that all those for whom they have responsibility are aware that any form of harassment and discrimination based on the grounds outlined above, in all its manifestations is prohibited. They will ensure that any complaints will be attended to immediately and effectively.

WWCT recognises that employees, volunteers and Board members have the right to be free from harassment and discrimination. Such harassment and discrimination has the purpose or effect of unreasonably interfering with an individual's or a group's work performance, or of creating an intimidating, hostile or offensive working environment. Individuals or groups who are not the direct target of the conduct in question may also suffer harassment and discrimination as a result of being present when such conduct takes place.

Complaints

This procedure may be utilised by groups as well as individuals and may involve complaints against one or more individuals. The conduct in question may constitute harassment, and a complaint may be brought under this procedure, whether the conduct occurs on Warley Woods' property or at any Warley Woods' related activity. Cases dealt with under this procedure may involve one or more forms of harassment or discrimination. Any reprisal, expressed or implied, for making and pursuing a complaint under this procedure is itself considered a breach of this policy.

Complaints will be handled using WWCT's procedures. There are different complaints procedures for staff or Trustees. Please see the full employment or volunteer policies for the relevant procedure.

APPENDIX C

Disciplinary Procedure

The organisation's aim is to encourage improvement in individual conduct or performance. This procedure sets out the action which will be taken when disciplinary rules are breached.

Principles

- The procedure is designed to establish the fact quickly and to deal consistently with disciplinary action. No disciplinary action will be taken until the matter has been fully investigated.
- At every stage employees will be informed in writing of what has been alleged and have the opportunity to state their case at a disciplinary meeting and be represented or accompanied by a trade union representative or a work colleague.
- An employee has the right to appeal against any disciplinary penalty.

Procedure

Stage 1 - first warning

If conduct or performance is unsatisfactory, the employee will be given a written warning or performance note. Such warnings will be recorded, but disregarded after a stated number of months of satisfactory service. The employee will also be informed that a final written warning will be considered if there is no sustained satisfactory improvement or change.

Stage 2 - final written warning

If the offence is serious, or there is no improvement in standards from a stage one warning, or if a further offence of a similar kind occurs, a final written warning will be given which will include the reason for the warning and a note that if no improvement results within a stated number of months, action at Stage 3 will be taken.

Stage 3 - dismissal or action short of dismissal

If the conduct or performance has failed to improve, the employee may suffer demotion or dismissal.

Gross misconduct

If, after investigation, it is confirmed that an employee has committed an offence of the following nature (the list is not exhaustive) the normal consequence will be dismissal without notice or payment in lieu of notice:

theft, damage to property, fraud, incapacity for work due to being under the influence of alcohol or illegal drugs, physical violence, bullying, gross insubordination, bringing the organisation into serious disrepute, a serious breach of confidence or a serious breach of health and safety rules.

While the alleged gross misconduct is being investigated, the employee may be suspended, during which time they will be paid their normal pay rate. Any decision to dismiss will be taken only after full investigation.

Appeals

An employee who wishes to appeal against any disciplinary decision must do so to the Trust Manager, or Chair of the Trust within five working days. The Trust will hear the appeal and decide the case as impartially as possible.

APPENDIX D

Warley Woods Community Trust IT Code of Practice

Warley Woods Community Trust (WWCT) IT Code of Practice is based around three key principles

1. Protecting WWCT reputation
2. Using IT systems to enhance WWCT operations
3. Maintaining security and protecting WWCT IT systems

Protecting WWCT reputation

Use of IT systems

- 🔒 PCs, Laptops and other media devices used carelessly may attract risk and IT systems must be used responsibly.
- 🔒 Do not: access, download, forward, or distribute material via WWCT systems, which is illegal or likely to cause offence. This includes defamatory or undesirable content, jokes and chain letters and statements, text or pictures that are pornographic, racist, sexist, discriminatory, offensive, or otherwise contrary to the aspirations of WWCT.
- 🔒 If you become aware of the existence of inappropriate or illegal content on the company's systems, report your findings to The Trust Manager immediately.
- 🔒 Please note all work performed on the company's IT systems belong to WWCT. It may be monitored at any time

Databases

- 🔒 Ensure that you are familiar with the current key provisions of the Data Protection Act 1998 before creating a database, or accessing or transmitting data from an existing one. http://www.ico.gov.uk/for_organisations/data_protection.aspx
- 🔒 Where possible, advise the individual before processing their data and tell them how you intend to use their information. If necessary, obtain their written consent, and only use personal information for purposes notified to the individual and do not keep personal information any longer than you need to.
- 🔒 Any data subject to the Data Protection Act should not be taken from the Warley Woods site unless encrypted.

Email

- 🔒 Exercise a high degree of care and attention using electronic mail, both internally and externally. Using electronic mail externally is not without risks- in both security and reputation. Emails may be monitored at any time.
- 🔒 Attach email history only when necessary. Consider whether 'reply to all' is essential.
- 🔒 Do not: forward, or distribute material via WWCT email, which is illegal or likely to cause offence. This includes defamatory or undesirable content, jokes and chain letters and statements, text or pictures that are pornographic, racist, sexist, discriminatory, offensive, or otherwise contrary to the aspirations of WWCT. Do not make personal comments about an individual, or discuss their characteristics or abilities using e-mail
- 🔒 WWCT permits employees to access personal email accounts, provided this does not affect productivity or compromise WWCT reputation or come into conflict with any other part of the ITCOP. **However**, downloading attachments from personal email accounts onto WWCT IT equipment should be avoided due to the risk of virus contamination.

Internet use

- 🔒 You may make limited personal use of the Internet during your personal time provided this does not affect productivity, compromise WWCT reputation and meets with the terms set out in the ITCOP

- 🕒 WWCT permits employees to make limited personal use of social software, provided this does not affect productivity or compromise WWCT reputation or come into conflict with any other part of the ITCOP
- 🕒 Do not access Web pages, RSS Feeds, and News Feeds or participate in a chat room whose content is unknown to you; or whose content is likely to involve pornography or support for an illegal, racist, or offensive activity.
- 🕒 Do not post comments about individuals on social media, internet bulletin boards, chat rooms, or websites. These may give rise to an action for libel against WWCT and the author.
- 🕒 Publishing personal information on the Internet may expose you to the risk of identity theft. Only publish information that you would be happy for strangers to see.
- 🕒 WWCT reserves the right to monitor and investigate individual usage of the Internet using WWCT IT equipment, including individual usage of social software

Social Media

Ensure you are aware of the separate policy and guidance relating to the use of social media.

Using IT Systems to enhance WWCT operations

Personal use of IT systems

- 🕒 The use of photographs for computer screen savers is acceptable – so long as the content does not infringe the principles of the ITCOP - but limited storage space precludes the storage of other non-business related data such as personal photographs, music, and video files on the WWCT storage system.
- 🕒 Do not use WWCT IT systems, including its Internet access, to operate any business not authorised by WWCT

Housekeeping and management of your PC/laptop to enhance your performance and productivity

- 🕒 Review your PC's hard drive regularly to clear out old data files and gain storage and speed
- 🕒 Zip stored folders and files to minimise storage space. Routinely Delete or archive unwanted data files, documents and folders.
- 🕒 Before leaving WWCT, you must ensure your data has been backed up or transferred and all outstanding work handed over.

Maintaining security and protecting WWCT systems

- 🕒 It is your responsibility to ensure that any WWCT hardware, systems, password and data that been entrusted to you is secure
- 🕒 Report a missing PC, hand held device, hard drive or backup file immediately to the Trust Manager
- 🕒 Do not connect any PC/Laptop not owned by WWCT to the WWCT network without permission of the Trust Manager
- 🕒 Do not allow anyone outside of WWCT employees, trustees and volunteer to use your PC/laptop unsupervised.
- 🕒 Lock away your laptops, hand held device (and storage media) when not in use at any time during the day and in particular at night, weekends and when travelling.
- 🕒 If working at home and accessing work email or data on the server, do not leave this data unattended and do not download and then keep personally attributable data from OSWALD.

Installing and downloading software

- 🕒 Do not make unauthorised copies of WWCT's software,

- 🔒 Do not install unauthorised software on WWCT PCs/Laptops, except as authorised by the Trust Manager
- 🔒 Do not download software from the Internet, except as authorised by the Trust Manager
- 🔒 Do not intentionally download, launch, install or save any unauthorised wallpaper, sound, screen saver, video clip, game or executable file (for example, files with extensions such as .exe, .com, .avi, .mpeg, .bat, .js, .mp3)
- 🔒 The downloading, installation or playing of games is not permitted.

Maintain Anti Virus protection

- 🔒 Ensure Anti Virus protection are set to automatic update and check periodically that they are updating regularly
- 🔒 Virus check all files that you receive, or are sending out
- 🔒 Do not open attachments in unsolicited e-mail messages or follow links within emails if the sender is not known.

APPENDIX E

Absence Policy and Procedures

Whilst Warley Woods Community Trust understands that there will inevitably be some sickness absence amongst its employees, it must also pay due regard to its operational needs. If an employee is persistently or frequently absent from work, this can damage efficiency and productivity, and place an additional burden on the employee's colleagues. Where practicable, measures will be taken to assist those who have been absent by reason of sickness to return to work.

The additional financial burden on the Trust must be managed within the organisation's resources and the Trustees' fiduciary duties.

By implementing this policy, the organisation aims to strike a reasonable balance between the pursuit of its operational needs and the genuine need of employees to take time off work because of ill health.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the management.

1 Definitions:

"Period of sickness absence" means any continuous period of sickness absence, of whatever length, during which the employee does not work.

"Short-term sickness absence" means any period of sickness lasting from one to twenty seven calendar days.

"Long-term sickness absence" means any period of sickness lasting twenty eight calendar days or more.

"Formal review period" means a defined period during which an employee is required to show an improvement in their sickness absence levels under the organisation's sickness absence management procedure.

"Occupational Health" means the current supplier for Occupational Health services engaged by WWCT

2 Short Term Sickness Absence Policy and Procedure

This policy covers short-term sickness absence. Once an employee's sickness has lasted 28 calendar days, the Trust's long-term sickness absence policy applies.

If the Trust suspects the absence is due to misconduct, its separate disciplinary procedure will apply. For example, the Trust may take disciplinary action if there is evidence that:

- Absence is not genuine or not for the reason provided;
- The employee is undertaking inappropriate activities while off sick, such as carrying out work for another organisation; or
- The correct sickness absence notification and evidence procedure has not been followed.

3 Return to work:

Actions required by the employee and line manager

On an employee's first day back after any period of sickness absence, the employee should complete a Return to Work form and provide medical evidence where the sickness is longer than seven consecutive calendar days.

On an employee's return to work following a period of sickness absence, their manager should check the employee's absence record. This is to check whether or not the need for formal action under the organisation's absence management procedure has been triggered.

The manager should check absences 12 months prior to the date of the employee's return to work. For example, if the employee returns to work on 1 April, the employer should examine the period from 1 April through the previous year to 31 March.

The line manager should bear in mind that special considerations apply to absences related to pregnancy, disability and part-time working. See section 5 below.

When checking the employee's absence record, the line manager should also review whether or not the employee's absences have been frequent, regular or repeated. The manager should look for and note any patterns of absence, for example frequent absences on Fridays or Mondays, or immediately before or after bank or public holidays. Managers should, however, remain open minded about an employee's absences.

The line manager should hold a return-to-work interview with the employee each time the employee returns from a period of sickness absence.

4 Return-to-work interview:

On the first day back at work after any period of sickness absence of an employee, the employee's manager will arrange to meet formally with them.

If this is not possible on the employee's first day back (for example, for operational reasons or because the manager is not available), the meeting should take place as soon as reasonably practicable.

The return-to-work interview should take place in a private place, and all discussions between the employee and the manager should remain confidential to the organisation.

The manager should:

- Welcome the employee back to work;
- Explain to the employee that the purpose of return-to-work interviews is to manage and monitor employees' absence and attendance to identify any problem areas and offer support where appropriate;
- Inform the employee that his/her absence will be recorded;
- Ask the employee about the reasons for their absence, ensuring that the question is asked in a supportive way without any suggestion that the employee is to blame for the absence;
- Ask the employee whether or not they have consulted a doctor or attended hospital;
- If the employee's sickness has been for seven calendar days or less, ask the employee to complete a self-certification form for the period of sickness absence and sign it in front of the manager, who should then countersign the form.
- If the employee's sickness lasts for eight calendar days or more, ensure that the employee has provided a fit note from his/her doctor and
- Inform the employee if they have hit a trigger point, and the consequences of having done so.

5 Updating the employee's absence record:

The line manager should keep a track of absences for their future reference. They should also complete the interview section of the return to work form and pass to the Trust Manager, so that a central record of absences is kept and the form filed in the member of staff's personal file.

6 Special cases:

Pregnancy-related absences:

Pregnant employees who are off work because of pregnancy-related ill health must abide by the organisation's absence reporting procedure. For example, a pregnant employee is

subject to the usual notification and evidence requirements, and can be asked to attend a return-to-work interview when returning to work.

However, any sickness absence by a pregnant employee for a pregnancy-related reason should not be included when checking to see if the need for formal action under the organisation's absence management procedure has been triggered.

If the manager is in any doubt as to whether or not a pregnant employee's absence is related to her pregnancy, the manager should seek medical clarification their medical practitioner or OH referral.

Disability-related absences:

Where an employee gives as the reason for absence an underlying health issue that could amount to a disability under the Equality Act 2010, the manager must refer the employee to Occupational Health or for other medical opinion. This includes where the employee states that s/he is suffering from stress.

Managers should remember that the organisation is under a duty to make reasonable adjustments for disabled employees. The legal definition of a "disability" is wide and managers should seek further information and guidance. Where the absence is wholly or partly for a disability-related reason, the trigger points referred to in this policy may need to be modified to take proper account of the employee's disability and other adjustments to the procedures set out in this policy may need to be made. The manager should discuss this with their line manager.

For part-time workers, the trigger points set out below will be pro-rata, rounded up to the nearest day.

7 Medical advice:

Occupational Health referrals:

At various stages of managing the employee's sickness absence, a manager may want to obtain advice on the employee's fitness for work from Occupational Health advisers.

Examples of when a line manager might refer to Occupational Health include to:

- Seek a medical report on the employee, in which case the consent of the employee is needed;
- Establish when the employee might be able to return to work;
- Ask for guidance on the employee's condition, for example if there is a possibility that the employee is disabled or ambiguity as to the exact nature of the condition; and
- If the employee is disabled, discuss any adjustments that could be made to accommodate the employee's disability.

Medical Practitioner referrals:

Where a report from the employee's medical practitioner is necessary, the employee will be fully informed of their rights under the Access to Medical Reports Act 1988 and their permission will be sought for the report to be obtained. The employee's permission will be sought to contact the medical practitioner on the relevant consent form.

The employee has the right to access the report before the Trust sees it. If the employee wishes to see the report, they should inform the Trust of this, so that it can inform the medical practitioner. The employee will then have 5 working days to contact the medical practitioner to see the report. If the employee does not contact the medical practitioner within this period, the medical practitioner can pass the report on to the organisation.

Where the employee refuses permission for the Trust to contact his/her medical practitioner, the organisation will explain to the employee the reasons behind the request and inform the employee that a decision relating to his/her employment may be made without the benefit of access to medical reports. The same procedure will be followed where the employee delays in giving his/her consent.

When requesting a report, the Trust will provide the medical practitioner with as much information as possible on the role of the employee and explain why the report is being sought. The Trust will provide the medical practitioner with:

- A copy of the employee's signed form consenting to the request to seek a medical report;
- Confirmation that the employee is aware of his/her rights under the Access to Medical Reports Act 1988; and
- Details of the major features of the employee's job.

The Trust will ask the medical practitioner to identify:

- The nature of the employee's illness or injury;
- Whether or not there are any underlying medical conditions that explain the employee's pattern of absences; and
- What reasonable adjustments could be made to working conditions or work premises to facilitate a return to work?

The Access to Medical Reports Act 1988 does not apply where the Trust is seeking a medical report from a medical practitioner who has not been responsible for the employee's clinical care, typically its own chosen specialist or occupational health adviser. In these circumstances, the Trust is still required under the Data Protection Act 1998 to obtain the employee's express consent to its obtaining a medical report.

The Trust will explain to the employee in writing what information it is seeking on the employee's health and how the information will be used. The letter should explain to the employee:

- That the Trust intends to obtain a medical report and why it wishes to do so;
- From whom the report will be obtained; and
- What the Trust will do with the report.

The letter should be accompanied by the relevant consent form.

If the employee consents, the Trust will write to the medical practitioner to request the report, enclosing a copy of the consent form. The letter should explain to the medical practitioner why the Trust is requesting the report, and ask any specific questions that it wishes the practitioner to answer.

Where the employee refuses permission for the Trust to obtain a medical report to which the Access to Medical Reports Act 1988 does not apply, the Trust will explain to the employee the reasons behind the request and inform the employee that a decision relating to his/her employment may be made without the benefit of access to medical reports. The same procedure will be followed where the employee delays in giving his/her consent.

8 Special or Compassionate Leave:

Occasionally employees will need time away from work, not because they are sick, but because of personal circumstances such as the bereavement of a close family member or friend or other traumatic event. The Trust Manager has the discretion to award up to five days special leave in these circumstances. Leave of greater than five days to be considered

and approved or otherwise by an Officer of the Board of Trustees. These absences will not form part of the employees' sickness record.

9 Sickness whilst on leave:

The Trust will comply with government guidance regarding employee sickness whilst on leave. Sickness whilst on leave will count towards an employee's sickness record unless it arises from the Special Cases above.

10 Sickness absence management:

The trigger points that are used to decide when action needs to be taken to manage an employee's sickness absence record are set out below. When applying these trigger points, the special rules that apply to pregnancy, disability and part-time working must always be borne in mind.

Stage 1

Trigger point is:

- Eight days' sickness absence in the previous twelve months; or
- Four instances of sickness absence in the previous twelve months.

Meeting:

On the employee reaching a stage 1 trigger point, the employee's line manager will invite them in writing to a stage 1 absence review meeting.

- The letter should advise the employee who will be present and that the employee can be accompanied by a fellow worker or trade union official.
- The letter should explain to the employee that the purpose of the meeting is to review the employee's unsatisfactory attendance level.
- The letter should warn the employee that a possible outcome of the meeting is that s/he may be given a warning and moved to a formal review period.

The meeting will be chaired by the employee's line manager. At the meeting, the manager will:

- Explain to the employee that the purpose of the meeting is to discuss the employee's unsatisfactory attendance in the previous twelve months;
- Make clear to the employee that the aim of the meeting is to find ways to improve his/her attendance;
- Allow the employee to share his/her views;
- Try to establish any underlying reasons for the employee's poor attendance level, for example a health issue or personal problems;
- Gather as much information as possible on any underlying reasons identified, without putting undue pressure on the employee to reveal more information than they want to;
- Discuss and agree any steps that can be put in place to help the employee to improve his/her attendance;
- If there is an underlying health problem, refer the employee to occupational health/encourage the employee to book an appointment with his/her doctor, if this has not already been done;
- Remind the employee of the support that is available, including referral to the occupational health, GP etc. and
- After a short adjournment, if possible, inform the employee of the outcome of the meeting and state that the outcome will be confirmed in writing to them within five working days.

Outcome

After the meeting, the manager will set out in writing what has been decided as a result of the stage 1 meeting. The letter should include details of any further steps or targets that have

been agreed to help the employee to improve their attendance, and any support that the organisation is providing for the employee.

In limited circumstances, for example if there are extenuating reasons for the absences, the outcome of a stage 1 sickness absence review meeting could be that the manager decides that it is not appropriate to move the employee to a formal review period. If the decision is that no further action will be taken, the letter should inform the employee of this and provide an explanation for the decision.

If the outcome of the stage 1 sickness absence review meeting is that the employee should be given a warning and moved to a formal review period the letter should warn the employee that, while on the formal review period, the consequences of reaching sickness absence levels of an additional six days, or three instances of absence, in a further twelve month period will be that the employee moves to stage 2 of the organisation's absence management procedure.

The letter should give the employee the right to appeal against the warning. This appeal will be considered by the Trust Manager.

Improvement

If the employee's sickness absence levels improve (i.e. during the formal review period, they have had less than six days, or three instances in a rolling twelve month period), no further action will be taken. The manager should write to the employee explaining to them that they have completed the formal review period.

Stage 2

If during the formal review period, the employee's sickness absence does not improve the employee will be moved to stage 2. A further medical opinion can be sought, if the reason for absence is different from previous stages.

Trigger point is:

- after a further six days sickness absence or
- three periods of sickness absence in a rolling twelve months period

Meeting:

On reaching a stage 2 trigger point, the employee's line manager will invite them in writing to a stage 2 formal review meeting giving him/her at least five working days' notice of the meeting.

- The letter should advise the employee who will be present and that the employee can be accompanied by a fellow worker or trade union official.
- The letter should explain to the employee that the purpose of the meeting is to review the employee's continued unsatisfactory attendance level while on a stage 1 formal review period.
- The letter should warn the employee that a possible outcome of the meeting is that s/he may be given a second, and final, warning and moved to a second formal review period.

The meeting will be chaired by the line manager. At the meeting, the manager will follow the process as in Stage 1 above.

Outcome

After the meeting, the manager will set out in writing what has been decided as a result of the stage 2 meeting. The letter should include details of any further steps or targets that have been agreed to help the employee to improve their attendance, and any support that the organisation is providing for the employee.

In limited circumstances, for example if there are extenuating reasons for the absences, the outcome of a stage 2 sickness absence review meeting could be that the manager decides that it is not appropriate to move the employee to a second formal review period. If the decision is that no further action will be taken, the letter should inform the employee of this and provide an explanation for the decision.

If the outcome of the stage 2 sickness absence review meeting is that the employee should be given a final warning and moved to a formal review period the letter should warn the employee that, while on the formal review period, the consequences of reaching sickness absence levels of an additional four days, or two instances of absence, in a further twelve month period will be that the employee moves to stage 3 of the organisation's absence management procedure.

The letter should give the employee the right to appeal against the warning. This appeal will be considered by the Trust Manager.

Improvement

If the employee's sickness absence levels improve (i.e. during the formal review period, they have had less than four days, or two instances of absence in a rolling twelve month period), no further action will be taken. The manager should write to the employee explaining to them that they have completed the formal review period.

Stage 3

If during the formal review period, the employee's sickness absence does not improve the employee will be moved to stage 3. A further medical opinion can be sought, if the reason for absence is different from previous stages.

Trigger point is:

- after a further four days of sickness absence or
- two periods of sickness absence in a rolling twelve months period

Meeting:

On reaching a stage 3 trigger point, the Trust Manager will invite the employee in writing to a stage 3 short-term sickness absence final meeting.

- The written invitation to the stage 3 short-term sickness absence formal review meeting should give the employee at least five days' notice of the meeting. The letter should advise the employee who will be present and that the employee can be accompanied by a fellow worker or trade union official.
- The letter should explain to the employee that the purpose of the meeting is to review the employee's continued unsatisfactory attendance level while on a stage 2 formal review period.
- The letter should warn the employee that a possible outcome of the meeting is that they may be dismissed by reason of capability.

The meeting will be chaired by the Trust Manager. At the meeting, the manager will follow the process as in Stage 1 above.

Outcome

Within five working days of the meeting, the manager will set out in writing the outcome of the stage 3 final meeting.

The outcome of the meeting could be:

- A decision to take no further action;
- An offer to make adjustments to the employee's work;

- Redeployment, if this is possible, with the employee's agreement; or
- A decision to dismiss the employee.

The employee will have a right of appeal. The employee should be informed of their right of appeal in the outcome letter.

11 Appeal

An employee who is given a warning or is dismissed under this procedure has the right of appeal. The appeal should be sent in writing to the Company Secretary of the Trust and set out the grounds on which the employee believes that the decision was flawed or unfair.

The employee should lodge their appeal within five days of receiving written confirmation of the sanction imposed on them by the Trust.

An appeal hearing will be convened within ten working days if at all possible after the appeal is lodged. The appeal hearing will be chaired by an Officer of the Board of Trustees, who will be accompanied by the Trust Manager.

The employee will be entitled to be accompanied by a fellow employee or a trade union official.

At the hearing, the decision to impose the sanction will be reviewed and the employee will be entitled to make representations about the appropriateness of that decision.

The outcome of the appeal will be confirmed to the employee in writing, explaining the grounds on which the decision was reached. The outcome of the appeal will be final.

12 Other considerations:

If a line manager is called to a stage meeting then the Trust Manager will chair this meeting and any appeal will be heard by an Officer of the Board of Trustees.

If the Trust Manager is called to a stage meeting then their supervising Trustee will chair these meetings and any appeal will be heard by an Officer of the Board of Trustees.

Approved 19/12/17

5 VOLUNTEERS

Volunteers are involved in almost every area of activity of WWCT. WWCT attracts, and continues to attract people with a range of backgrounds and skills, and a shared commitment to the values of Warley Woods.

Position Descriptions

There is no such thing as a typical WWCT volunteer or role description. Our policy is to meet with prospective volunteers to determine their particular skills, interests and expectations. In the process we assess how they might complement WWCT's needs.

Initial contact

On contacting WWCT, all potential volunteers are to be informed of the type of voluntary work generally available and hours of operation. Potential volunteers will be asked to fill out the volunteer form. Volunteers with email addresses will be added to the Volunteer Email Group to ensure the full range (including one-off) of volunteering opportunities is shared widely.

The exception to this recruitment process is where a volunteer responds to a specific call for volunteers – for example to help at an event or leaflet collation.

Health and Safety

Volunteers are not covered by Health and Safety legislation which relates solely to employees. However Volunteers are covered by an organisation's duty of care. When working as a volunteer for WWCT they will either be under the responsibility and care of an event organiser or a volunteer session supervisor. A volunteer session supervisor will follow the health and safety checklist to ensure all volunteers are briefed as to the relevant issues for that activity.

Rights and responsibilities of volunteers

WWCT Volunteers have a right to:

- 🕒 Work in a safe and healthy environment
- 🕒 Be provided with a place to work and suitable tools and materials
- 🕒 Be adequately insured
- 🕒 Receive adequate information and a clear description of what is expected and to understand why they are doing a task and how it fits into the broader programme
- 🕒 Be assigned a suitable project, task or job and to say no to tasks they are unable to do, or would rather not do and to ask for a new job
- 🕒 To have on the job supervision provided by a designated staff member or trustee
- 🕒 Receive respect and support from their co-workers as well as recognition and feedback from their supervisor for their work
- 🕒 Provide feedback, suggestions and recommendations regarding their job or the wider programme
- 🕒 Have their personal details kept in a confidential manner
- 🕒 Be reimbursed for out of pocket expenses, providing prior approval is obtained from a manager or Board member
- 🕒 Request a reference from a manager or Board member when applying for a job, providing the volunteer has worked at WWCT for a minimum period of three months
- 🕒 Have access to dispute resolution procedures and to be supported through such a process

WWCT volunteer responsibilities:

- 🕒 Be reliable and commit, where possible, to regular day/s and time of work so tasks can be planned accordingly

- 🕒 Notify the designated WWCT Board member if they are no longer able to work with WWCT
- 🕒 Agree to work in a safe and healthy way and not jeopardise the health and safety of others
- 🕒 Inform WWCT of any pre-existing medical conditions or special needs that WWCT should be aware of that might affect the volunteer's ability to undertake certain tasks
- 🕒 Report any injury immediately to a manager or Board member
- 🕒 Keep WWCT informed of changes of address and phone number
- 🕒 Appreciate and respect the confidential nature of information that may be acquired during course of duties
- 🕒 Not to spend money or order goods on behalf of WWCT without prior approval
- 🕒 Abide by any WWCT policies regarding their work
- 🕒 Show enthusiasm, loyalty and belief in the work of WWCT
- 🕒 To ask for support when needed
- 🕒 Abide by WWCT's no smoking, alcohol or drug use policies when volunteering
- 🕒 If you use WWCT computers or are given permission to connect a computer or device to the Warley Woods network, please agree to abide by the IT Code of conduct and sign the relevant form.
- 🕒 Report any instances of harassment or unequal treatment that they are subject to, or witness to their volunteer supervisor, event organiser or the Trust Manager.
- 🕒 Report any concerns about the welfare of children to the Trust Manager.

As with paid work, all voluntary work done for or on behalf of WWCT belongs to WWCT and cannot be used or sold without the permission of WWCT Board members. All confidential records, documents and other papers, together with any copies of extracts thereof, made or acquired by the volunteer in the course of their work shall be the property of WWCT and must be returned to WWCT on finishing volunteering for WWCT.

WWCT recognises that volunteers contribute a vast wealth of skills, knowledge and support towards the running of WWCT. All WWCT staff in return are to treat volunteers with respect and support.

Volunteers are to be included, where possible, in all relevant staff meetings, discussions and celebrations. Volunteers should be given every opportunity to develop their skills to enhance their own skill base.

All volunteer's personal information will be treated with confidentiality. Registration forms will be kept in a locked filing cabinet.

Equal treatment policy

It is the policy of WWCT to ensure equal treatment for all qualified persons and not discriminate against any volunteer or prospective volunteer because of any of the protected characteristics of the Equality Act 2010: namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Harassment and Discrimination

WWCT believes in the necessity of providing safeguards for its volunteers against harassment and discrimination. This includes harassment and discrimination on the basis of any protected characteristic. It is the responsibility of all employees to contribute to the elimination of harassment and discrimination.

Full details of our policy on harassment and discrimination can be found at Appendix B to the Employment section

Dispute Resolution

WWCT is a community organisation and it is hoped that all disputes can be solved through discussion with concerned parties. It is advisable that all disputes are dealt with in a timely fashion.

If there is a dispute between a staff member or Board member and a volunteer, they should try to resolve it directly. If this does not resolve the problem they should notify the Trust Manager or a designated Board member. If the dispute is of a serious nature it should also be put in writing and a copy given to the Trust Manager or the designated Board member. The Trust Manager's or the designated Board member's role is to talk with both parties to determine a solution. Where appropriate, the Trust Manager or the designated Board member should mediate a meeting between the volunteer and the staff member to discuss the problem openly. If the dispute is of a serious enough nature, disciplinary action may be taken.

Resignation

Volunteers are an invaluable resource to WWCT but it is recognised that due to changing circumstances the volunteer may need to resign from their voluntary position. WWCT requires that volunteers give as much notice as possible to the Trust Manager and/or a representative of the Board before leaving WWCT.

Board of Trustees

Board Procedures

The following are proposed as procedures for the conduct of the work of the Board at WWCT.

1. Board meetings will be held on the third Tuesday of every month.
2. The Secretary will remind trustees of the date of the next board meeting at least 1 week in advance of the meeting and ask for papers to be submitted.
3. The papers should be sent out by e-mail 3 days before the meeting. In exceptional circumstances papers may be tabled at the meeting.
4. The Chair will start the meeting at the time appointed. In the absence of the Chair, the Vice Chair will chair the meeting.
5. Trustees unable to attend the meeting should inform the secretary and the office in advance of the meeting if at all possible.
6. The secretary, or someone else appointed by the Board, will take the minutes of the meeting and circulate them as soon as possible after the meeting.
7. There may be confidential items on the agenda and the Chair should indicate where this is the case. These should not be discussed with anyone else other than trustees and the Trust Manager.
8. Officers of the Trust - Chair, Vice Chair, Treasurer and Secretary - will be elected by the board at the first meeting following the Trust AGM.
9. The Trustees may amend or add to these procedures at any time.

Code of Conduct for Trustees of Warley Woods Community Trust

The Code of Conduct is to be used alongside the statutory duties and responsibilities of trustees. Further information about these can be found in the Charity Commission publication 'The Essential Trustee' which is in the Board packs given to WWCT trustees.

The Code of Conduct is based on the Nolan Principles. The Nolan Committee published its 'Seven Principles of Public Life' following their enquiry and they form the basis of many codes of conduct in the public sector.

The seven principles are:

1. Selflessness
2. Integrity
3. Objectivity
4. Accountability
5. Openness
6. Honesty
7. Leadership

The Code of Conduct for the Trustees of WWCT is set out below:

It is the responsibility of the Trustees to:

- 🕒 Act within the governing document and the law – being aware of the contents of the organisation's governing document and the law as it applies to Warley Woods Community Trust (the Trust).
- 🕒 Act in the best interest of the Trust as a whole – considering what is best for the organisation and its beneficiaries and avoiding bringing the Trust into disrepute.
- 🕒 Manage conflicts of interest effectively – registering, declaring and resolving conflicts of interest. Not gaining materially or financially unless specifically authorised to do so.
- 🕒 Respect confidentiality – understanding what confidentiality means in practice for the Trust, its board and the individuals involved with it.

- 🕒 Have a sound and up-to-date knowledge of the Trust and its environment – understanding how it works and the environment within which it operates.
- 🕒 Attend meetings and other appointments or give apologies – considering other ways of engaging with the organisation if regularly unable to attend trustee meetings.
- 🕒 Prepare fully for meetings and all work for the Trust – reading papers, querying anything you don't understand and thinking through issues in good time before meetings.
- 🕒 Actively engage in discussion, debate and voting in meetings – contributing positively, listening carefully, challenging sensitively and avoiding conflict.
- 🕒 Act jointly and accept a majority decision – making decisions collectively, standing by them and not acting individually unless specifically authorised to do so.
- 🕒 Work considerately and respectfully with all – respecting diversity, different roles and boundaries, and avoiding giving offence.

Trustees are expected to agree to the content and spirit of this code. In the event of any serious breaches of the code the Trustee could be asked to resign.

Complaints against board members

- 1.1 If a complaint is made about a Trustee concerning a breach of the code of conduct this will initially be passed to the secretary.
- 1.2 The secretary will consider the information provided and will decide whether the matter requires any investigation or action.
- 1.3 If no further investigation is deemed necessary the secretary will consider what action is necessary to deal with the complaint.
- 1.4 If it is thought that further investigation is required to deal with the complaint the secretary will liaise with the chair to decide what is the appropriate course of action.

WWCT is a community organisation and it is hoped that all disputes can be solved through discussion with concerned parties. It is advisable that all disputes are dealt with in a timely fashion.

If there is a dispute between a staff member or Board member and a volunteer, they should try to resolve it directly. If this does not resolve the problem they should notify the Trust Manager or a designated Board member. If the dispute is of a serious nature it should also be put in writing and a copy given to the Trust Manager or the designated Board member. The Trust Manager's or the designated Board member's role is to talk with both parties to determine a solution. Where appropriate, the Trust Manager or the designated Board member should mediate a meeting between the volunteer and the staff member to discuss the problem openly. If the dispute is of a serious enough nature, disciplinary action may be taken.

6 MEMBERSHIP

Data protection

Special precautions must be taken when collecting sensitive data such as phone numbers, e-mail addresses, bank information, or personal identification numbers. WWCT protects all personal information and does not sell, lend or in any way share personal information including addresses, phone numbers, e-mails, age, bank information and all forms of personal information of staff, volunteers, Board members or members.

Membership registration

Membership with WWCT is open to anyone who supports the aims of the Trust. Those wishing to become members must complete a registration form and pay an annual membership fee.

Membership Period

Membership lasts for one full year from the date of initial registration. All members are given one month notice of the need to renew their membership. A second and final reminder to renew are sent and membership newsletters are still sent out up to two months after a membership has expired with a reminder attached.

Membership fees determined by the Board

Membership fees are set by the Board. Membership fee increases may occur on an annual basis.

Ending membership

WWCT membership will cease upon:

- 🕒 the death of an individual
- 🕒 a member giving signed notice to WWCT Board
- 🕒 failure to pay the annual membership fee
- 🕒 Board termination of a membership (The Board reserves the right for good and sufficient reason to terminate the membership of any member provided that the member concerned be offered the right to be heard on appeal and the final decision by the ordinary members in a General Meeting. The decision of the General Meeting is final).

Members of the Board

All persons appointed to the WWCT Board must be members of WWCT. Board members must also be 18 years of age or older. The maximum number of people on the Board is 15 and can be no less than 10. Board members are elected or nominated at the Annual General Meeting (AGM) and are appointed for a period of 3 years.

Voting

At the AGM and other general meetings, members who are 18 years or older are entitled to one vote. Voting may be done personally or by proxy.

Member benefits

Members are entitled to vote at general meetings, to receive the newsletter (the LEAFlet) and receive any other additional information from WWCT.

7 HEALTH AND SAFETY

Our statement of general policy is:

The Trust shall:

- 🕒 Provide adequate monitoring and control of the health and safety issues arising from our work activities;
- 🕒 Consult with our employees on matters affecting their health and safety;
- 🕒 Provide and maintain safe plant and equipment;
- 🕒 Ensure safe handling and use of substances;
- 🕒 Provide information, instruction and supervision for employees;
- 🕒 Ensure all employees are competent to do their tasks, and to give them adequate training;
- 🕒 Minimise accidents and cases of work-related ill health;
- 🕒 Maintain safe and healthy working conditions; and maintain a safe environment for the public
- 🕒 Review and revise this policy as necessary at regular intervals.

Implementation

Responsibilities

The Trust shall implement its Health and Safety policy by assigning the following accountabilities and responsibilities.

Overall and final accountability for health and safety is that of: **The Company Board.**

The Board nominates a Trustee to liaise with the Trust Manager on health and safety issues.

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

The Trust Manager. (Detailed procedures are set out in the Trust's Health and Safety Manual.)

To ensure health and safety standards are maintained/ improved, the following roles / people have responsibility in the following areas

Position /Person	Area of Responsibility
Trust Manager	The Site managed by Warley Woods Community Trust
Golf Course and Park Manager (or nominee)	Workshop and compound
Trust Manager (or nominee)	Pavilion Building (Except the kitchen)
Current contractor / franchisee of the cafe	Kitchen
Trust Manager (or nominee)	Contractors working on site.
Trust Manager's volunteer nominee for the work in hand.	Volunteers
Contractor's Manager	Contractual defined area of work.

All employees shall:

- 🕒 Co-operate with supervisors and managers on health and safety matters;
- 🕒 Not interfere with anything provided to safeguard their health and safety;
- 🕒 Take reasonable care of their own health and safety;
- 🕒 Report all health and safety concerns to an appropriate person (as detailed in this policy statement).

Arrangements

Health and safety risks arising from our work activities

The Trust Manager may delegate these responsibilities to a nominated competent person. These responsibilities will be recorded in the individual's job description.

The Trust Manager (or nominee) will:

- 🕒 undertake risk assessments to cover all major activities, (including golf, events and the public at large in the park).
- 🕒 report the findings of the risk assessments to the competent person in charge of the work who will then inform all those affected by the risk
- 🕒 check the efficacy of the risk assessments
- 🕒 review the risk assessments annually or when the work activity changes, whichever is soonest.

The competent person in charge of the work is responsible for implementing the actions resulting from the risk assessment.

The Trust Manager will report the findings of the risk assessment review to the board annually.

Consultation with employees

Employee representative(s) are the Golf Course and Park Manager and the Golf and Retail Development Manager.

Consultation with employees is provided newsletters and feedback by the line manager.

Safe plant and equipment

The Trust Manager (or nominee) will be responsible for:

- 🕒 Identifying all maintenance requirements.
- 🕒 Ensuring effective maintenance procedures are in place for all plant or equipment that needs them.
- 🕒 Ensuring that all identified maintenance is implemented.
- 🕒 Checking that new plant and equipment meets health and safety standards before it is purchased.

Any problems found with plant / equipment should be reported to the competent person in charge of it. (In the event of any doubt this should be the Trust Manager)

Safe handling and use of substances

The Trust Manager will be responsible for:

- 🕒 Identifying all substances which need a COSHH assessment.
- 🕒 Undertaking COSHH assessments.
- 🕒 Ensuring that all actions identified in the assessments are implemented.
- 🕒 Ensuring that all relevant employees are informed about the COSHH assessments.
- 🕒 Checking that new substances can be used safely before they are purchased.
- 🕒 Ensuring that COSHH assessments are reviewed every 5 years or when the work activity changes, whichever is soonest.

Information, instruction and supervision

The Trust Manager will ensure that:

- 🕒 The Health and Safety Law poster is displayed in the main entrance.
- 🕒 Appropriate safety leaflets are issued by the competent person to employees as required.
- 🕒 Health and safety advice is available from Sandwell MBC
- 🕒 The appropriate competent person provides supervision of young workers / trainees.
- 🕒 The Trust's employees, working at locations under the control of other employers, are given relevant health and safety information.

Competency for tasks and training

The Trust Manager (or nominee) will provide induction training for all employees.

The appropriate competent person will arrange job-specific training for employees. (This may be on the job training, a contractor or consultant or a recognised e-learning course)

Specific jobs requiring special training are:

- 🕒 Off road vehicles
- 🕒 Mowing machines
- 🕒 Lifting operations
- 🕒 Chain saws,
- 🕒 Wood chippers.
- 🕒 chemical spraying.

The Trust will maintain Training records either on paper or electronically as required by the Trust Manager

The Trust Manager (or nominee) will identify, arrange and monitor staff training.

Accidents, first aid and work-related ill health

Health surveillance is required for employees doing the following jobs.

- 🕒 Any work involving Visual Display Units (VDU)
- 🕒 Any power tool or powered equipment.
- 🕒 Handling chemicals. (As defined by the COSHH regulations)
- 🕒 Lifting operations.
- 🕒 Repetitive actions.

- 🕒 Health surveillance will be arranged by The Trust Manager (or nominee)
- 🕒 Health surveillance records will be kept by the Trust in employees personal files.
- 🕒 First Aid Boxes are kept in the shop, office, compound and kitchen
- 🕒 The supervisor of an injured person will ensure that all accidents and cases of work-related ill health are recorded in the accident book. The accident forms are kept in the shop, once completed handed the Trust Manager for action and then filed in the Trust's H&S folder.
- 🕒 The Trust Manager is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority.

Monitoring

The Trust Manager (or nominee) is responsible for:

- 🕒 Investigating accidents.
- 🕒 Investigating work-related causes of sickness absences.
- 🕒 Acting on investigation findings to prevent a recurrence of accidents and work-related causes of sickness absences.
- 🕒 checking our working conditions, and ensuring our safe working practices are being followed.

WWCT will undertake an annual safety audit and, where reasonably practicable, use an independent advisor / consultant

Emergency procedures –fire and evacuation

The Trust Manager (or nominee) is responsible for ensuring that

- 🕒 A fire risk assessment is undertaken and that any mitigating actions are taken and that:
- 🕒 Alarms are tested by the Trust's approved contractor every year. (Alarm monitoring personnel advised accordingly)
- 🕒 The emergency evacuation procedure will be reviewed with staff every year or when there is a significant change to personnel.

Public safety

The Trust will maintain a safe environment for the public, in the park, in the Pavilion, at events and in the vicinity of work areas with risk assessments of general risks in the area and specific assessments where there is a hazard caused by natural or work events. The Trust maintains a presence in the park 364 days a year during daylight hours and will respond proactively to concerns of the public brought to them on hazards occurring in the park.

Pertinent Legislation

Health and Safety at Work Act 1974

Health and Safety at Work Regulations 1999

The Provision and Use of Work Equipment Regulations 1998,

Substances Hazardous to Health Regulations (COSHH) 1999.

Health and Safety (Display Screen Equipment) Regulations 1992 (as amended in 2002)

Occupiers Liability Acts 1957 and 1984

Common Law

WWCT Byelaws

Definitions**Competent person**

A competent person is considered to be 'someone who has the necessary skills and knowledge by way of training and experience to undertake the appropriate tasks in a competent manner.'

Review date

The Trust Manager should review and revise this policy in the light of experience, or because of operational or organisational changes and at least every 5 years.

8 FIRE POLICY

Warley Woods Community Trust recognises that a prime concern to them is the safety of the public and their staff. In the event of a fire we expect the general public and staff to evacuate the area and call the fire brigade. In brief our policy on fire evacuation may be summarised as:

- 🕒 On detecting a fire sound the fire alarm,
- 🕒 On hearing the fire alarm: -
 - Get out of the building,
 - Stay out of the building,
 - Call the fire brigade.

Rationale

The Trust, building and park land is a public meeting place and is available for the users without staff present. The trustees believe that it is unreasonable to expect members of the public to operate any fire fighting equipment. In the interests of safety, the get out, stay out rule reduces the risk of injury by people using equipment to fight fires.

Procedures.

We will publish procedures both to the hirer and for display giving clear instruction what to do in the event of a fire and clearly mark exit doors.

The trustees will arrange for a fire risk assessment each year.

As part of the fire risk management process the Trust make the following conditions.

- 🕒 We will not allow highly flammable substances on our premises.
- 🕒 We will only permit decorations of a non combustible nature.
- 🕒 We will not allow combustible materials or decorations near light fittings or sources of heat.
- 🕒 We will only permit space heating sources provided by the Trust in the building.
- 🕒 We will not permit Portable Liquefied Gas Heaters in the building.
- 🕒 We will keep contract waste bins at a location away from the main building.

Equipment

The Trust will maintain a simple fire alarm system that provides both audible and visual indication of a fire. We may link the alarms to a central control point.

We will only maintain fire fighting equipment where a fire risk assessment deems it would be warranted. We will not provide fire fighting equipment for the general public.

Policy review

Every 5 years or when there is a significant change to the site fire risk assessments.

9 **PARK USAGE**

9.1 **Events**

Events instigated, organised and managed by WWTC will further WWCT objectives and will be part of an agreed action plan to support:

- 🕒 Community Engagement
- 🕒 Communications
- 🕒 Membership services
- 🕒 Fundraising for the Trust's Charitable objectives
- 🕒 Educational objectives

Trust events may at times be designed for, and therefore promoted to, a specific target section of the public (i.e. an event designed for young people, or an event primarily aimed for bird-watchers). However, all Warley Woods' events, activities and programmes will be open to everyone with an interest to participate.

Agreements to arrange Golf Club events and their competition fixtures should be drawn up and approved by the Board.

Events organised by other groups and individuals

WWCT will consider requests on a case-by-case basis from organisations and individuals wishing to organise responsible events in the park for the enjoyment of the whole community. The Board (represented by the community partnership and events subgroup) has the right to deny any or all requests.

The Trust will limit the number of events to ensure that the predominant atmosphere of the Park is tranquil and spontaneous. Organised events should be sensibly phased and not become an intrusive aspect of a visit to the park. A record of booked events, including organiser contact details are kept on OSWALD.

WWCT considers proposals from potential organisers that reassure, in writing, that the following standards are met:

- 🕒 that the event will not cause damage to the park
- 🕒 that general access to the park is not to be cordoned off and unduly impeded¹.
- 🕒 that the resources of the Trust (financial and human, including paid staff and volunteers) are not diverted from the main objective of WWCT, or that an appropriate re-imburement is made to cover any costs sustained
- 🕒 that the enjoyment of the park by the general public is not impeded by the event
- 🕒 that it does not impact on or contravene our public liability insurance cover
- 🕒 that it does not bring the Trust into disrepute
- 🕒 that do not involve political or religious promotion
- 🕒 that alcohol is not to be sold and that any other vending falls within legal licensing
- 🕒 that the event organisers are covered by their own public liability insurance
- 🕒 that any vehicles needed as part of the event remain in designated areas
- 🕒 that no dangerous substances permanent markings or fire will be involved
- 🕒 that there is an appropriate level of qualified first-aid expertise present as part of the organising team

¹ Exception: The Golf Course, which has been the subject of extensive community consultation and is part of an agreed strategy for the continued enjoyment of these specialist facilities and their contribution to the long-term strategy of maintaining the park.

Procedures

For outside organisations or groups to book an event in the park they should consult the Trust Manager.

Decision making process:

The Trust Manager is able to make decisions on small events. The Communities and Events Subgroup can be consulted if unsure. Permission for major events or potentially contentious or disruptive events should be referred to the Board

Event Checklist

At least two months before the event the organiser must:

- 🕒 Contact the Trust Manager to discuss the event
- 🕒 Submit a proposal in writing or by email to outline the event and activities

After WWCT approves the event the organiser must:

- 🕒 Provide proof of insurance to cover the event
- 🕒 Provide a risk assessment for the event
- 🕒 Provide information on the event to the Police and Fire Service
- 🕒 Inform the Trust Manager or Administrator of event planning and special needs

Before the event the organiser must:

- 🕒 Set up of facilities (i.e. stages, lighting, tents, booths etc) necessary is the responsibility of the organiser and not WWCT staff or Board members unless otherwise stated by the WWCT Board
- 🕒 Hazard tape must be used by the organiser to define potentially hazardous areas and to cover cables. WWCT staff and/or Board members will advise the organiser on potential hazards prior to the event.
- 🕒 Ensure that a designated Board or staff member opens the necessary facilities. If staff or Board members are unavailable then arrange to pick up the keys.

During the event the organiser must:

- 🕒 Ensure that there are no fires on Warley Woods premises (i.e. BBQs)
- 🕒 Ensure that swearing and profanities are not used by organisers, on stage, or elsewhere.
- 🕒 Ensure that litter is placed in litter bins in the events area and designate a person to monitor bins and empty, if necessary.

After the event the organiser must:

- 🕒 Ensure that the site is left in the same condition, or better than it was found
- 🕒 Pick up any rubbish and collect rubbish bags. Rubbish bags should be brought to the Pavilion.
- 🕒 Return the bollards and lock them in place.
- 🕒 All facilities should be locked by a staff member, Board member or by the organiser.
- 🕒 If keys were borrowed they should be returned immediately to a designated staff or Board member.

The Warley Woods Community Trust is not responsible for lost or stolen items at any time including public events.

Adverse weather policy

General

As Warley Woods Community Trust holds many events outdoors, it is inevitable that some events will coincide with less than ideal weather conditions. The Community Trust monitors weather forecasts, but will only make a decision to cancel or continue on the day of the event itself when the best judgement can be made about what is likely to happen on that day.

Most cancellations will arise from safety considerations, e.g. wind speeds, sodden ground or use of electrical equipment. The Trust will not be held responsible for consequential losses arising from the cancellation of an event.

Cancellation of events

If an event is cancelled this will be published on the Trust's web site www.warleywoods.org.uk and/or on the Trust Office answerphone 0121 420 1061. Please check both locations if in doubt.

Any advance payment to the Trust for a stall will be refunded, but no additional expenses can be considered.

Inclement weather conditions

If an event goes ahead in inclement weather it is for the stall holder to decide whether to participate, and they are responsible for ensuring that they have adequate protection for their property e.g. for an outside event affected by rain.

If a stall holder decides that they do not want to attend an event because of the weather conditions any advance payment to the trust for their stall will be refunded.

Hosted events

The annual theatre performance hosted in the Woods is managed by Heartbreak Productions and a decision to cancel the theatre performance would be made by them and not by Warley Woods Community Trust. Their terms and conditions would apply in this instance.

From time to time other organisations organise events in the woods, with the permission of the trust. Except in matters of health and safety, where the Trust may decide to withdraw permission for the event, it will be the organisers' responsibility to deal with issues arising from inclement weather. The Trust may decide to cancel externally organised events and its decision is final.

9.2 Byelaws

Byelaws for Warley Woods have been approved in law and are contained in a separate document.

9.3 Dogs policy

This policy was agreed in July 2007 to guide the Trust's approach to the management of its responsibilities towards dogs, dog walkers and other Woods users affected by dogs' presence in the Woods.

-  It is an offence to fail to remove dog faeces from Warley Woods.
-  It is an offence to allow a dog into children's play areas.
-  It is an offence to not put and keep a dog on a lead if directed by an authorised council officer.

These offences are supported in law and were agreed by Sandwell MBC in December 07.

Well behaved dogs and their owners are welcome in Warley Woods and it is recognised that the Woods and particularly the meadow area are attractive spaces for dog walkers to be able to exercise their dogs off their leads.

In addition to the legal obligations on dog walkers, the Trust agreed to:

- 🐾 Make continuous efforts to advise Woods' users of the legal, health and respect situation, ensuring that the "critical mass" favours responsible behaviour and that responsible dog owners continue to provide mutual support. This will involve both legalistic and encouraging notices and the exploration of warning/information leaflets to be given to "offending" dog walkers.[Communications Subgroup]
- 🐾 Provide free bags for members of the public willing to collect dog mess from the Woods.[Trust Manager]
- 🐾 Invite the street wardens onto the site to enforce the law. Seek publicity for such action [Trust Manager}.

- 🐾 Make continuous efforts to remind all Woods users of their responsibilities towards other users [Communications Committee]

9.4 Memorials

There are currently no opportunities for new memorial benches in Warley Woods. In general people who wish to have a physical connection with the woodland are encouraged to adopt an existing tree on an annual basis. The planting of new trees in memoriam is only possible where this planting also meets the needs of the Woodland Management Plan and adopters have been made aware of the risk of vandalism. Individuals wishing to physically plant trees are informed about annual tree planting events during the winter months. It is not possible to put plaques on trees or at the base of a tree.

WWCT does permit the scattering of ashes on Warley Woods but asks that the relatives are sensitive to other park users when selecting the time and place for this. The burial of ashes is not permitted unless as part of a memorial tree planting activity.

9.5 Lettings

The Trust will let room(s) to the inhabitants of the Borough of Smethwick and the neighbourhood without distinction of sex or of political, religious or other opinions, and in particular for use for meetings, lectures and classes, and for other forms of recreation and leisure time occupation, with the object of improving the conditions of life for the said inhabitants.

Use by other Bodies or Persons

Subject and without prejudice to any use by the Trustees, the rooms shall be used for the said purposes by such bodies or persons as the Trustees shall determine free of rent, but subject to a payment in respect of the expenses of and incidental to the maintenance and use of the rooms, and otherwise upon such terms as may be agreed.

The Trust may from time to time permit the said rooms to be used otherwise than for the said purposes subject to a payment sufficient at least to defray the expenses incidental to the use in each case, but so as not substantially to interfere with its use for the said purposes.

Restriction on booking the rooms.

The Trust will not permit the buildings and premises to be let on a regular basis for use to any one person or for any one purpose for more than twelve months, (without a break agreement after each 12 months.

Application of Income

After payment of any expenses of administration, the net income to the Trust, whether arising from the use of the room(s) by other bodies or persons or otherwise, shall be applied by the Trustees in one or other, or both, of the following ways:

- (a) In the maintenance and insurance of the Property of the Trust and the payment of rates, taxes and, other expenses in connection with its use for the aforesaid purposes;
- (b) In otherwise furthering the said purposes.

Determination of charges.

The Trustees shall review charges annually.

Hire of rooms.

The Trustees shall hire room(s) under a standard contract that is in force at that time.

10 ENVIRONMENTAL POLICY

Warley Woods Community Trust is an organisation that is committed to providing a high-quality leisure environment to enhance the quality of life for local residents, it is therefore important that its operations do not contribute to the detriment of other environments and the quality of life of others.

Warley Woods Community Trust tries to minimise the adverse impact of its operations on the environment. It is committed to complying with all relevant environmental legislation. It is committed to monitoring its impact, both internally and through the involvement of external monitors. The Trust is committed to working with Sandwell MBC, contractors, partners and the local community to continually improve its environmental performance and look for innovative ways to reduce the environmental impact of its operations.

All staff and volunteers with purchasing authority or site responsibilities will be made aware of these commitments

All contractors will be made aware of these commitments and they will be asked for written assurances of their agreement to comply with them when working for Warley Woods Community Trust as a condition of their engagement.

Environmental Management System

The Trust will keep a log of all environmental legislation and keep it up to date. It will keep a purchasing log of items identified as being of specific concern. It will keep a log of all use of chemicals and ensure that use of chemicals are only used when alternatives have been considered and when specifically authorised by the nominated Board Member. The Trust will monitor waste produced on site and seek to reduce, reuse and recycle whenever possible. All energy, water and fuel used on site will be monitored and steps taken to facilitate economic use of these resources.

Financial Implications

It is acknowledged that the Trust has limited financial resources and that some actions it may wish to take may be beyond the limits of its budgets. If this factor affects particular decisions being taken then this should be recorded in the Environment folder for auditing purposes. It is agreed that any savings made from resource efficiency should be made available for other projects which would reduce the Trust's environmental impact.

11 SAFEGUARDING CHILDREN AND VULNERABLE ADULTS

WWCT works with Children and Vulnerable Adults in a variety of different ways and is committed to creating a safe and secure environment for all its users. The welfare of children and vulnerable adults will be safeguarded at all times. This policy and its associated procedures has been developed to support staff, volunteers and contractors in continued best practice.

It is designed to establish the roles and responsibilities of everyone who works for WWCT. In the context of Children and Vulnerable Adults, children refers to anyone under the age of 16 years old. A vulnerable adult is a person aged 16 years or over who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. Whether or not a person is vulnerable in these cases will depend upon surrounding circumstances and each case must be judged on its own merits.

This policy is based on, and reflects, the principles of current UK legislation, guidance and other relevant WWCT policies and procedures. The approach has been developed in such a way as to be consistent with 'Best Practice' within the field of child and vulnerable adult protection. It does this within the framework of Working together 2010 and the Children's Acts 1989 and 2004.

The key principles are:

- 🕒 The welfare of children and vulnerable adults is the paramount consideration.
- 🕒 All children and vulnerable adults, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from harm or abuse.
- 🕒 It is everyone at WWCT's responsibility to safeguard children and vulnerable adults.
- 🕒 Safeguarding children does not just mean protecting children from paedophiles. It has also means protecting them against abuse, inappropriate parenting and/or caring and from other children and young people who may wish to cause harm. All individuals working with children have a responsibility to safeguard them against harm.
- 🕒 Abuse is not confined to sexual abuse, the definition also include physical abuse, emotional abuse and neglect.

It is WWCT's intention to ensure that staff or volunteers are not placed in situations where abuse might be alleged against them. It is not intended that the policy should restrict staff or volunteers from normal ways of working, but staff and volunteers always need to consider how an action or activity may be perceived as opposed to how it is intended.

Policy in practice

Responsibility of All Staff, Contractors and Volunteers

- 🕒 In those areas of WWCT where employees, contractors or volunteers work with children as part of their roles, the Trust Manager or their delegated representative acts as Child Protection Officer and has overall responsibility for ensuring adherence to the Safeguarding Children and Vulnerable Adults Policy. The Trust Manager will be the first point of contact for all children and vulnerable adult protection questions/issues relating to WWCT. They will have responsibility to provide advice and guidance to staff, contractors and volunteers who:
 - 🕒 During the course of their work, believe that a child or vulnerable adult may be at risk of harm,

and/ or

- 🕒 Observe something of concern
- 🕒 Are told by a child or vulnerable adult or a third party of a welfare issue

They will advise on the appropriate way to report any concerns or incidents. Should the Trust Manager be uncontactable, then the Named Trustee who should be contacted is Kate Slade. Both individuals will be provided with training and information on the correct courses of action to follow. Viv Cole, Trust Manager attended Sandwell's Safer Organisations training on 14/3/2016 and Kate Slade in May 2014. This training, or equivalent Sandwell MBC approved training will be updated every 3 years.

WWCT does not take responsibility for activities with young people undertaking golfing activities which Warley Woods Golf Club organises, even if these are delivered by the same golf professional staff who work at the golf course with the Trust on other projects. The Trust will ensure all contractors, e.g. Golf professionals, naturalists, educationalists who work with the Trust are aware of these procedures and will offer safeguarding advice to any professionals who usually operate on Warley Woods site independently of the Trust.

Health and Safety

Staff or volunteers undertaking risk assessments should be aware of this policy and should take account of their particular vulnerabilities, which will include child and vulnerable adult protection.

Procedures

Selection, Checks and Induction

Since September 2012 it has not be possible for WWCT to undertake DBS (previously CRB) checks for staff or volunteers as their contact with children or vulnerable adults is not seen to be regular enough to warrant one. It is therefore limited in the checks it is able to undertake on staff, volunteers or contractors who may come into contact with children.

- 🕒 Two references will be required for all successful candidates before employment begins
- 🕒 Copies of DBS checks will still be requested for all golf professionals
- 🕒 The Board will decide on a case by case basis if any particular volunteer roles require reference requests.
- 🕒 All staff, relevant contractors, trustees and volunteer session supervisors will be taken through this policy, procedure and best practice guidance as part of their induction
- 🕒 It is crucial that both staff and volunteers observe best practice guidance, in particular the guidance related to working alone.

Reporting procedure for concerns or allegations

If you have a concern about the safety of a child or vulnerable adult or if an allegation is made you should:

- 1) report it immediately to the Named Senior Manager (the Trust Manager) or nominated Trustee.
- 2) record what you have seen or heard using WWCT incident reporting form.
- 3) Put the completed form in a sealed envelope marked private and confidential and either deliver into the hand or into their individual post tray. If being passed to a trustee call them to tell them it is there and needs urgent attention.

Advice on actions

- 🕒 You can seek advice from any of the organisations named below
- 🕒 Do not promise a child that information they give will be kept secret. If possible ensure they are aware that you will share important information with others.
- 🕒 Do not ask the child lots of additional questions
- 🕒 Do not try to investigate the incident before seeking advice.

Advice on Recording

- 🕒 Use WWCT incident reporting form
- 🕒 Record all relevant details
- 🕒 Differentiate fact from opinion
- 🕒 Keep a chronology of actions taken and decisions made
- 🕒 All records to be timed, dated and signed.
- 🕒 Try to get an accurate version of events
- 🕒 Do not get a child to write their own version of events or sign any documentation

Actions for Named Senior Manager (currently Viv Cole or Kate Slade)

- 1) In all cases contact Local Authority Designated Lead (LADO): currently Ushma Batti (contact details below) for advice. If it meets significant hard criteria this should be done within 1 day
- 2) If needed a referral to Children's Services should be made on form CPR1 form available in the Trust Office
- 3) The LADO will track progress and monitor outcomes if further action is needed and taken. They will report to us within 10 days
- 4) Decision on disciplinary hearing should be made within 2 days and if needed hearing should be held within 15 days

Phone numbers

- 🕒 Local authority designated officer (LADO) 0121 569 4770
- 🕒 Access Team (for concerns) 0845 351 0131
- 🕒 The following numbers can provide advice and support if you wish for it in addition to following the procedure.
- 🕒 Sandwell Emergency Duty Team 0121 561 3704
- 🕒 Police Child Protection 0121 626 9101
- 🕒 Police general 0845 113 5000
- 🕒 NSPCC Helpline 0808 800 5000
- 🕒 Childline 0800 1111
- 🕒 English Golf Union Lead Child Protection Officer 01653 697578 can be approached if there are golf-specific issues that need clarification.

Best practice guidelines

WWCT undertakes to:

- 🕒 Treat children, young people and vulnerable adults with care, respect and dignity. Recognise that those working for WWCT will be perceived by children and vulnerable adults as trusted representatives of WWCT
- 🕒 Ensure communication with children and vulnerable adults is open and clear
- 🕒 Risk assess all activities
- 🕒 Provide appropriate supervision and training for staff and volunteers in this area
- 🕒 Ensure staff and volunteers avoid inappropriate contact with children and vulnerable adults
- 🕒 Share information about concerns with agencies who need to know and involve parents, carers, children and vulnerable adults appropriately
- 🕒 Follow carefully the procedures for recruitment and selection of staff and volunteers

Supervision

There should be at least one adult for each 10 children taking part in activities. Parents should be encouraged to attend events where their children are taking part. Parents should be aware that if children are left unsupervised, other than to attend specific organised events, the Community Trust cannot accept supervisory responsibility.

Behaviour

Adults should behave appropriately and provide a strong positive role model for children. Physical contact should always be intended to meet the needs of the child and the activity and not the adult. Contact should always take place in an open environment.

Use of toilet facilities

As toilets are used by members of the public, it is best that children involved in activities on site are accompanied. Because we rarely have “surplus” staff on site, it is best if toilet facilities are used at the beginning or end of sessions. If a child needs to use the facilities mid-session they should be accompanied by their parent, or a member of shop or office staff, if at all possible.

Working alone

It may sometimes be necessary for staff or volunteers to be alone with young people or vulnerable adults, on site or in the building. Whenever possible this should be avoided with activities taking place in full sight of the members of the public or other staff or volunteers. If it is necessary when working on site or within the building then staff or volunteers involved should ensure other staff or volunteers are aware of their intended location and how long they intend the activity to take. On return, they should ensure the person they notified is aware of their return.

Transport

The Community Trust does not take any responsibility for transporting children. If individuals associated with, or employed by, the Community Trust wish to provide transport for children they do so at their own risk and should receive permission from parents/carers.

Accommodation

It is not WWCT’s policy to expect a child, young person or vulnerable adult to stay away from home overnight as part of any WWCT programme. Any rare exceptions to the above will be considered on a case by case basis and guidance issued accordingly. Therefore there are no provisions relating to overnight stays included in this document.

Work experience

Warley Woods Community Trust does offer work experience opportunities for young people who live in Sandwell MBC. This will only be possible where the young person is working with two or more members of staff or volunteers. Staff and volunteers should observe the “working alone” guidance given above.

Photographs

WWCT understands that not all parents or carers are happy for photographs to be taken of children. When working with organised groups of children, WWCT will work with that organisation following its rules and procedures. When WWCT has asked a photographer to record an event, permission will be asked of adults before photographs are taken of children taking part or winning prizes. When children have signed up to take part in a project, written parental consent will be sought. At large events where gaining individual permission would be impractical, announcements through personal address systems should be used to inform visitors that there is an official photographer making a photographic record of the day and that people should indicate if they do not want to have their photograph taken. The photographer should carry identification from the Trust.

Lost children

If a lost child comes to the attention of staff or volunteers, then this should be reported to the police, rather than social services.

12 SECURITY

Keys and Keyholders

A full list of keys, their locations and their holders is kept in the Trust Office. The same key opens all park gates with the exception of the main gate. This key may be issued to contractors who need access to the park.

Intruder Alarm

A supplier provides intruder alarm and panic alarm services. The main control panel is in the store room in the Shop. At this time the panic alarm has police response. The intruder alarm does not. A confirmed intruder alarm is only triggered if two zones are activated e.g. door opening and motion sensor. The monitoring company will call if only one zone is activated to enable the building's security to be checked.

The system has four areas called "groups" on the system. 1 Is the pavilion main entrance and café. 2 Is the trust office. 3 Is the shop. Zone 4 is the greenkeepers' compound. While this system is separate, if activated a radio signal will be sent to the main building and an alarm will sound. This will not be transmitted to the monitoring company unless the main zones are all set. This system has to be reset at the compound.

The Trust prefers a larger number of keyholders than is conventional in order to share this responsibility. Names of the current nominated key holders can be found in the alarm folder in the Trust Office. A person who holds keys for facilities is not necessarily an official keyholder for alarm purposes.

If the panic alarm is activated the monitoring service will call the police. Once activated the system must be reset using a key kept in the till. The alarm company also has to reset the system (remotely) so they will need to be called (24 hour service).

Fire Alarm

This is currently a standalone system and is monitored by the same company as the alarm. It is deactivated or settings can be changed by using the key kept in the shop. We currently have a mix of smoke alarms and heat detectors.

Cash Transportation

Staff routinely transport cash for banking. Staff should only do this, where they feel comfortable with the responsibility. Trustees can be asked to do this, if no staff are available. Anyone banking should vary their routine of taking cash, ensuring the cash is not obviously being carried. An accompanying colleague is recommended but not required. Staff are reminded that their safety is of more importance than cash and if a robbery is attempted, staff should release the cash, without question.

Patrols and emergency services

Police, police support officers and council wardens visit the site regularly. Fire brigade will attend if called. If they need to access the site they will cut chains or padlocks.

During the Summer, Trust volunteers patrol the woods in pairs several nights each week. They wear hi viz vests. The presence of the patrols is to help create a sense of safety and be a point of communication between the Trust and public. It is not about security enforcement which, if required, should be requested of the police.

Lone Workers Policy and Procedure

Introduction

Generally, there is no requirement in law that prohibits working alone, but the law does require that all work should be organised and controlled such that risks are identified, eliminated or reduced so far as is reasonably practicable. Recommended practice for “workers” applies equally to staff and volunteers. In all cases, workers should make their safety (and that of the public) of primary importance.

All workers have a responsibility to take reasonable care of themselves and others who may be affected by their acts. It is not possible to prescribe against all eventualities and therefore workers are asked to consider risk to their personal safety before undertaking a new activity and to raise issues with their line manager in advance.

If a worker has a medical condition that makes it unsuitable for them to work in a solitary situation, they should advise their manager immediately. The manager should seek medical advice to evaluate any working restriction that may need to be applied to the worker and ensure that the workplace is suitable and safe.

The Trust is required to identify hazards, assess risks and eliminate or control these risks.

General

Work on site should only be undertaken during daylight hours. Where special events require work in the dark, hi viz should be worn, work should not be undertaken alone and torches used.

Working in groups is recommended. Where a worker elects to undertake work on site alone, they should make a colleague or family member aware of where they are going and what work they are undertaking. A mobile phone should be carried.

The lighting around the Pavilion is activated by dusk to dawn sensors.

Groundstaff

It is inevitable that Groundstaff will be working alone and will be working with machinery. In addition to normal health and safety procedures, they should carry their personal or work issued mobile phone at all times and ensure it has sufficient credit. Managers and ground-staff must consider the need for supporting colleagues in specific situations e.g. the use of chainsaws which requires two people.

Shop staff

In order to operate a shop, staff will find themselves alone on site during early mornings, early evenings and at weekends. There is a panic button installed by the desk which will immediately direct a call through to the police. If any instance on site causes concern, lock the door and either call the police or one of the trustees who live locally and ask for their assistance

The doors to the shop should be locked when handling quantities of cash. Shutters should remain up to ensure staff can identify callers to the door. The main door can be locked and anyone in the building asked to leave if their presence is unwelcome.

In the event of an attempted robbery, staff should not attempt to protect property or money. Personal safety is of primary importance.

It is not a requirement of staff that they attend disputes on the golf course. Complaints can be dealt with when players return to the Pavilion or the police can be called if there is an

conflict on the course which needs resolving. Do not be afraid to call 999. The police will prioritise cases.

Office staff

If office staff are alone on site after dark then doors should be locked and entry only admitted to callers who are known. The pedestrian gate from the car park to the woods should be locked before darkness to limit the possibility of an approach from this direction. If working beyond normal working hours staff should inform a trustee or family member to make them aware of where they are and when they are due to leave or arrive home.

Incidents

Any incidents causing concern should be raised at the first opportunity with a manager to ensure new procedures or precautions can be introduced. Any incidents must be recorded in the appropriate system.

13 CCTV

Background.

Warley Woods Trust has experienced high levels of destructive vandalism around the Pavilion in the past. In conjunction with the police various methods of reducing this vandalism were considered. CCTV was chosen after persistent damage and with the endorsement of the police. The CCTV recordings may also assist with collecting data on infringements of the site's byelaws. It is not intended to monitor staff behaviour or law abiding behaviour of members of the public using the park.

Policy Statement

WWCT will use CCTV cameras on the external walls of the Pavilion and compound in order to deter and detect criminal behaviour.

WWCT will ensure:

- 🕒 That the procedures and systems that capture the CCTV images of individuals comply with the Data Protection Act;
- 🕒 Procedures are developed with reference to the CCTV Code of Practice (currently October 2014) published by the Information Commissioner's Office
- 🕒 That the images that are captured are usable;
- 🕒 They can reassure those whose images are being captured that the information obtained is not being misused.
- 🕒 The Warley Woods Trust Manager assisted by the Key Holders have the responsibility for control of the images and their use.
- 🕒 The Trustees will ensure that adequate management and maintenance procedures are in place to manage the system.
- 🕒 The Trust will audit the implementation of this policy every year.

Review

This policy is subject to review every 5 years. Date of next review 2022.

Procedures

WWCT has registered its use of CCTV with the ICO registration number Z3326522 and will renew registration each year in August. The Trust Manager, currently Viv Cole is responsible for ensuring all procedures are being followed.

There are eight cameras installed at the Pavilion and three in the compound which all send continual feed to the recording equipment which is kept securely locked. Data is periodically overwritten and therefore deleted and not kept longer than is necessary. The system will record 24 hours a day as crime can occur at any time. The cameras record using infrared and therefore no additional lighting is needed. Signs are displayed to warn the public that they may be being recorded. While the CCTV can be monitored in real time, in practice the monitors will be switched off and only watched if issues are reported. Only images are recorded and not conversations between members of the public.

- 🕒 Recorded images should only be viewed within the Trust Manager's office and should not be visible to visitors or the public through the window.
- 🕒 Key holders may check live images through online viewers in order to determine the correct course of action if an alarm is triggered. They should ensure that the images are not seen by unauthorised people.
- 🕒 There should be a monthly check of the system to ensure date and time accuracy and this check should be recorded on the monthly checklists for this work area.

Use of images

- 📌 Downloading of images from the CCTV system must be recorded in the CCTV record book.
- 📌 Records of any disclosures of any images to third parties must be recorded in the CCTV record book.
- 📌 Authorised people may show images to other staff, trustees or subgroup members for the express purposes of 1) identifying individuals or 2) discussing incidents which may require follow up.

If images are transferred onto other media or printed (lap top for illustration in meetings) they should be deleted or shredded immediately after use. Any images transferred to PCs for use in investigations should be password protected. These images should be deleted 6 months after the conclusion of any investigation.

Images should never be released to the media, unless through a law enforcement agency. Images should not be released to individuals, even if their property (e.g. car) has been damaged. These should only be released to the police.

There may be very limited circumstances where it may be appropriate to release images to a third party where their needs outweighs those of the individuals whose images are recorded. A decision on this should be made by a combination of at least two authorised people.

Authorised people should be very careful of sharing images in order to identify people and it would be preferable to seek advice from the police before doing so beyond staff, trustees and subgroup members.

Authorised people

Viv Cole

Sharon Simpson

Alan Merricks

Kathy Hodgkinson

Kate Slade

Arthur Ward

Steve Eling

John McBride

Don Gribben

Steve Wilkins

Chris Ashford

David Smallwood

Staff receiving enquiries about the operation of this system should be referred in the first instance to the Trust Manager, but in her absence one of the other authorised people. This policy can be shown to a member of the public.

Subject Access Requests

Individuals whose images are recorded have a right to view the image of themselves and to be provided with a copy of the images. We must provide this within 40 calendar days of receiving a request.

A person making such a request must do so in writing and must provide sufficient details to allow us to identify them as the subject. They will need to provide a photograph of themselves, or a description of what they were wearing at the time they believe they were recorded. They will need to supply the date, time and the location around the building. They will need to pay a fee of £10 (payable to Warley Woods Community Trust) at the time of lodging the request.

- 🕒 Staff receiving the request should record the date the request, information and payment were made.
- 🕒 The request should be passed to the Trust Manager for processing and the request should be dealt with within the statutory 40 calendar days
- 🕒 The Trust Manager should consider whether any individuals also captured in any images disclosed should be obscured and refer to the detail in the CCTV Code of Practice from the information Commission's office for guidance
- 🕒 The Trust Manager should record the subject access requests in the CCTV record book

Individuals under the Data Protection Act have two further rights one is to recognise a request from an individual to prevent processing likely to cause substantial and unwarranted damage or distress (Section 10 of Data Protection Act (DPA)) and one to prevent automated decision taking in relation to the individual (Section 12 DPA). The CCTV code of conduct suggests that both requests are unlikely for operators of CCTV equipment and the second would not be an issue for Warley Woods Community Trust. However should an individual suggest that recording is causing a significant problem for them, then the person hearing this complaint/request should record their contact details and the nature of their concern. This should be referred to the Trust Manager who would then seek guidance from the Information Commissioner's office.

14 MAJOR INCIDENTS AND DISASTER RECOVERY

Definitions

A “major incident” would relate to an occurrence on site which requires an immediate co-ordinated response such as an event requiring significant emergency services presence, significant antisocial behaviour; a death; major damage to the site.

“Disaster recovery” would be the procedure to follow if something occurred to materially impact on the Trust’s ability to operate its business. Disaster recovery precautions are centred around significant “damage” to the Pavilion, golf course, woodland or parkland.

Procedure

- 🕒 Ensure public and personal safety.
- 🕒 Inform relevant emergency services and any affected utility companies.
- 🕒 Ensure the area is safe.
- 🕒 Inform office and/or shop staff.
- 🕒 Erect signage: warnings or notices of closure and anticipated reopening.
- 🕒 Inform trustees and other staff. Notify them as to who is the incident manager and the phone numbers being used for emergency information; business matters and press.
- 🕒 Authorised incident manager should be one of: Trust Manager; Chair, Vice Chair or Company Secretary.
- 🕒 Incident Manager should deal with all media enquiries.

Messages

- 🕒 People before property
- 🕒 We are in control. We have a plan.
- 🕒 Either “It is business as usual. We are open” or “We will reopen within ? days”
- 🕒 If appropriate “we will need financial support to deal with this problem.”

15 PARK MAINTAINANCE

Maintenance of the park and golf course, and the principles and information underpinning this plan, are detailed in the comprehensive Warley Woods Community Trust Strategic and Management Plan. The maintenance of the site is managed through the site sub group that meets monthly and identifies and allocates tasks to a number of groups/agencies.

16 DEALING WITH UNACCEPTABLE BEHAVIOUR

Policy

Warley Woods is a public space where many different types and groups of people come together and it is inevitable that there will be conflicts. In general, conflicts between two individuals should be left to those individuals to resolve but there are circumstances where staff will be directly involved, or called upon to get involved. The Trust reserves the right to refuse the use of its facilities to anyone who demonstrates unacceptable behaviour.

Unacceptable behaviour includes, but is not limited to:

- threats of physical violence;
- swearing;
- inappropriate cultural, racial, religious or homophobic references;
- offensive or derogatory remarks.

Staff may be

- at the receiving end of unacceptable behaviour, in person, on the telephone or through social media
- witness to unacceptable behaviour
- called upon to deal with unacceptable behaviour on the premises
- called upon to deal with complaints about unacceptable behaviour after the event
- be in receipt of correspondence with includes unacceptable behaviour

Guidance for dealing with instances involving or concerning unacceptable behaviour (or generally difficult behaviour)

In person

- Warn the person that their behaviour is not acceptable and ask them to modify it.
- Try to defuse aggressive/difficult behaviour, but do not feel that you have to accept it.
- If they are complaining about something, offer sympathy
- If they have unreasonable expectations, listen and make notes and promise to pass on the information. Sometimes people just want to be heard.
- If staff support is available, call on it, or seek support from other customers if necessary.
- Staff have absolute permission to refuse custom to anyone exhibiting unacceptable behaviour and will be supported by managers and the Board should they feel the need to do this.
- Refer any instance of refusing custom to managers, so that a decision about future service can be made.
- Make note of any instances where customers have had to be advised to moderate their behaviour in the complaints and compliments folder in the shop.
- Staff may be asked to intervene in incidents in the cafe and may do so, if they feel able to, or to provide support to cafe staff, but should never feel obliged to become a referee between disputing parties.

- Try not to take things personally as people can be angry about the situation that they find themselves in. You should allow a customer who is becoming agitated to express their anger, but try not to make any hostile remarks yourself. Respond directly to questions and try to understand the aggressor's mood.
- Think about your non-verbal behaviour. Increase your distance and avoid sustained eye contact. Adopt a relaxed posture, move slowly, rather than suddenly, and maintain calm facial expressions. You should try to control any signals of anxiety and stress.
- Try to establish control. Try to work out what the agitated person needs, encourage them to make decisions and offer face-saving possibilities. You should be tactful, rather than hasty, in removing people from the premises. You should try and avoid using physical force or intervention. Be assertive: you should be firm but fair.
- Take immediate, preventative action if you think a situation may become violent.
- Involve the Police using the panic button or calling 999. Do not use 101 to report an incident in progress.

On the telephone

- warn the person that their behaviour is unacceptable and ask them to modify it
- terminate the conversation if it continues
- inform manager

On social media or in writing

Do not respond immediately, but seek advice from manager or the Board

On social media, you may have the options to delete personal comments if they are public, or report to the admin of the page.

Any letters involving unacceptable behaviour should either be responded to asking them to rewrite their issues in a more acceptable way which would then enable the Trust to respond.

Any letters involving only insults and unacceptable behaviour should be reported and kept but not responded to.

Unacceptable circumstances or escalation of issues

It is hoped that most instances of unacceptable behaviour will be the result of a moment of frustration or poor judgement. Later, things may calm, apologies or excuses made for behaviour and these may be acceptable to the person who was the subject of the behaviour. Sometimes this is not the case and this includes, but is not limited to:

- Racist, cultural, religious or homophobic insults, where there is a third party witness
- Direct threats of violence against staff
- Incidents which may affect the Trust's reputation if left unaddressed

These will result in indefinite bans on using the Pavilion, and golf course, if appropriate and extreme cases may require the application for an ASB to cover the entire site.

Any member of staff is allowed to ask someone to leave the Pavilion or golf course, if they feel it is warranted and that they would be safe in doing so. Following this, the Board will be asked to rule on the extent or length of any ban or withdrawal of services. The individual will be written to explaining the reason for and circumstances of the ban, wherever this is feasible.

Special circumstances

There may be circumstances, where mental illness, or a medical condition may lead to a person behaving in what would ordinarily be seen as an unacceptable way, or using generally unacceptable language. Special consideration should be given to a person under these circumstances, and help sought for them, if possible, but this does not mean staff or the public should accept being the focus of excessive verbal abuse or physical aggression.

17 INFORMATION SECURITY

Introduction

This Policy document encompasses all aspects of security surrounding confidential company information and must be distributed to all company employees. All company employees must read this document in its entirety and sign the form confirming they have read and fully understand this policy. This document will be reviewed and updated by Management on an annual basis or when relevant to include newly developed security standards into the policy and re-distributed to all employees and contractors where applicable.

Information Security Policy

Warley Woods Community Trust handles sensitive cardholder information daily. Sensitive Information must have adequate safeguards in place to protect the cardholder data, cardholder privacy, and to ensure compliance with various regulations, along with guarding the future of the organisation.

Warley Woods Community Trust commits to respecting the privacy of all its customers and to protecting any customer data from outside parties. To this end management are committed to maintaining a secure environment in which to process cardholder information so that we can meet these promises.

Employees handling sensitive cardholder data should ensure:

- Handle Company and cardholder information in a manner that fits with their sensitivity and classification;
- Limit personal use of Warley Woods Community Trust information and telecommunication systems and ensure it doesn't interfere with your job performance;
- Warley Woods Community Trust reserves the right to monitor, access, review, audit, copy, store, or delete any electronic communications, equipment, systems and network traffic for any purpose;
- Do not use e-mail, internet and other Company resources to engage in any action that is offensive, threatening, discriminatory, defamatory, slanderous, pornographic, obscene, harassing or illegal;
- Do not disclose personnel information unless authorised;
- Protect sensitive cardholder information;
- Keep passwords and accounts secure;
- Request approval from management prior to establishing any new software or hardware, third party connections, etc.;
- Do not install unauthorised software or hardware, including modems and wireless access unless you have explicit management approval;
- Always leave desks clear of sensitive cardholder data and lock computer screens when unattended;
- Information security incidents must be reported, without delay, to the individual responsible for incident response locally – Please find out who this is.

We each have a responsibility for ensuring our company's systems and data are protected from unauthorised access and improper use. If you are unclear about any of the policies detailed herein you should seek advice and guidance from your line manager.

1. Network Security

A high-level network diagram of the network is maintained and reviewed on a yearly basis. The network diagram provides a high level overview of the cardholder data environment (CDE), which at a minimum shows the connections in and out of the CDE. Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable should also be illustrated.

In addition, ASV should be performed and completed by a PCI SSC Approved Scanning Vendor, where applicable. Evidence of these scans should be maintained for a period of 18 months.

2. Acceptable Use Policy

Management's intentions for publishing an Acceptable Use Policy are not to impose restrictions that are contrary to Warley Woods Community Trust's established culture of openness, trust and integrity. Management is committed to protecting the employees, partners and Warley Woods Community Trust from illegal or damaging actions, either knowingly or unknowingly by individuals. Warley Woods Community Trust will maintain an approved list of technologies and devices and personnel with access to such devices as detailed the Information Security: List of devices record.

- Employees are responsible for exercising good judgment regarding the reasonableness of personal use.
- Employees should take all necessary steps to prevent unauthorized access to confidential data which includes card holder data.
- Keep passwords secure and do not share accounts with access to sensitive data. Authorized users are responsible for the security of their passwords and accounts.
- All PCs, laptops and workstations should be secured with a password-protected screensaver with the automatic activation feature.
- All POS and PIN entry devices should be appropriately protected and secured so they cannot be tampered or altered.
- The Information Security: List of Devices will be regularly updated when devices are modified, added or decommissioned. A stocktake of devices will be regularly performed and devices inspected to identify any potential tampering or substitution of devices.
- Users should be trained in the ability to identify any suspicious behaviour where any tampering or substitution may be performed. Any suspicious behaviour will be reported accordingly.
- Information contained on portable computers is especially vulnerable, special care should be exercised.
- Postings by employees from a Company email address to newsgroups should contain a disclaimer stating that the opinions expressed are strictly their own and not necessarily those of Warley Woods Community Trust, unless posting is in the course of business duties.
- Employees must use extreme caution when opening e-mail attachments received from unknown senders, which may contain viruses, e-mail bombs, or Trojan horse code.

3. Protect Stored Data

- All sensitive cardholder data stored and handled by Warley Woods Community Trust and its employees must be securely protected against unauthorised use at all times. Any sensitive card data that is no longer required by Warley Woods Community Trust for business reasons must be discarded in a secure and irrecoverable manner.
- If there is no specific need to see the full PAN (Permanent Account Number), it has to be masked when displayed.
- PAN'S which are not protected as stated above should not be sent to the outside network via end user messaging technologies like chats, ICQ messenger etc.,

It is strictly prohibited to store:

1. **The contents of the payment card magnetic stripe (track data) on any media whatsoever.**
2. **The CVV/CVC (the 3 or 4 digit number on the signature panel on the reverse of**

the payment card) on any media whatsoever.

3. The PIN or the encrypted PIN Block under any circumstance.

4. Information Classification

No cardholder information is held on site at Warley Woods Community Trust. No other data held in any Warley Woods Community Trust system is classified as confidential.

All data collected and used by Warley Woods Community Trust is of a non-sensitive nature and therefore no data has a classification label. However, as part of the staff induction process it is made clear that data should not be freely disseminated if it is not readily accessible from another source.

This situation will be reviewed annually by the Trust Manager and a classification labelling system introduced if necessary.

5. Access to the Sensitive Cardholder Data

All Access to sensitive cardholder information should be controlled and authorised. Warley Woods Community Trust holds no cardholder information on site, but does have a card reader attached to the till and online systems which can take payments from cards.

The card reader produces receipts which only show the last 4 digits and no other information. They are destroyed within 30 days of printing.

The online systems are hosted by 3rd parties so no card data is held anywhere that is accessible by Warley Woods Community Trust staff.

As these service providers have access to cardholder information of Warley Woods Community Trust customers:

- A list of such Service Providers will be maintained as detailed in Information Security List of Service Providers document..
- Warley Woods Community Trust will ensure a written agreement that includes an acknowledgement is in place that the Service Provider will be responsible for the for the cardholder data that the Service Provider possess.
- Warley Woods Community Trust will ensure that a there is an established process, including proper due diligence is in place, before engaging with a Service provider.
- Warley Woods Community Trust will have a process in place to monitor the PCI DSS compliance status of the Service provider.

6. Physical Security

Access to sensitive information in both hard and soft media format must be physically restricted to prevent unauthorised individuals from obtaining sensitive data. Warley Woods Community Trust holds no sensitive data on hard or soft media. However, there is a card reader attached to a till in the shop.

- Media is defined as any printed or handwritten paper, received faxes, floppy disks, back-up tapes, computer hard drive, etc.
- A list of devices that accept payment card data is maintained.
- The list includes make, model and location of the device.
- The list has the serial number or a unique identifier of the device
- The list is updated when devices are added, removed or relocated
- POS devices surfaces are periodically inspected to detect tampering or substitution.
- Personnel using the devices are trained and aware of handling the POS devices
- Personnel using the devices verify the identity of any third party personnel claiming to repair or run maintenance tasks on the devices, install new devices or replace devices.
- Personnel using the devices are trained to report suspicious behaviour and indications

of tampering of the devices to the appropriate personnel. Warley Woods Community Trust sites. A “visitor” is defined as a vendor, guest of an employee, service personnel, or anyone who needs to enter the premises for a short duration, usually not more than one day.

7. Protect Data in Transit

All sensitive cardholder data must be protected securely if it is to be transported physically or electronically.

Warley Woods Community Trust does not transport any cardholder information either physically or electronically.

8. Disposal of Stored Data

All data must be securely disposed of when no longer required by Warley Woods Community Trust, regardless of the media or application type on which it is stored.

As no cardholder data is stored by Warley Woods Community Trust, there are no documented disposal procedures or processes. This will be reviewed by the Trust Manager if any sensitive data is stored in the future.

9. Security Awareness and Procedures

The policies and procedures outlined below must be incorporated into company practice to maintain a high level of security awareness. The protection of sensitive data demands regular training of all employees and contractors.

Warley Woods Community Trust currently does not hold sensitive cardholder data. If any sensitive data is stored in the future the Trust Manager will:

- Review handling procedures for sensitive information and hold periodic security awareness meetings to incorporate these procedures into day to day company practice.
- Distribute this security policy document to all company employees to read. It is required that all employees confirm that they understand the content of this security policy document by signing an acknowledgement form (see Appendix A).
- All employees that handle sensitive information will undergo background checks (such as criminal and credit record checks, within the limits of the local law) before they commence their employment with Warley Woods Community Trust.
- All third parties with access to credit card account numbers are contractually obligated to comply with card association security standards (PCI/DSS).
- Company security policies must be reviewed annually and updated as needed.

10. Credit Card (PCI) Security Incident Response Plan

If any member of Warley Woods Community Trust staff believes there has been any compromise of cardholder information, or suspected breach of Trust systems they will report it directly to the Trust Manager.

The Trust Manager will assess the information provided and investigate the incident, limiting the exposure of cardholder data and mitigating the risks associated with the incident.

The Trust Manager will resolve the problem to the satisfaction of all parties involved, including reporting the incident and findings to the appropriate parties (credit card associations, credit card processors, etc.) as necessary.

The Trust Manager will determine if policies and processes need to be updated to avoid a similar incident in the future, and whether additional safeguards are required in the environment where the incident occurred, or for the institution.

Incident Response Notification

If the Trust Manager is absent, Warley Woods Community Trust staff will report the incident to any member of the board.

- **VISA breach:** For information visit:
http://usa.visa.com/business/accepting Visa/ops_risk_management/cisp_if_compromised.html
- **MasterCard breach:** Contact the MasterCard Compromised Account Team via phone at 1-636-722-4100.
- **Discover Card breach:** Contact the Discover Fraud Prevention at (800) 347-3102
- **American Express Steps:** Contact American Express Merchant Services at (800) 528-5200 in the U.S.

11. User Access Management

- Access to Company is controlled through a formal user registration process beginning with a formal notification from the Trust Manager.
- Each user is identified by a unique user ID so that users can be linked to and made responsible for their actions. The use of group IDs is only permitted where they are suitable for the work carried out.
- There is a standard level of access; other services can be accessed when specifically authorized by HR/line management.
- The job function of the user decides the level of access the employee has to cardholder data
- The Trust manager shall decide what access is required by a new user.
- Each user will be emailed a statement of their access rights after their induction procedure. The user will reply, indicating that they understand the conditions of access.
- As soon as an individual leaves Warley Woods Community Trust employment, all his/her system logons will be immediately revoked.

12. Access Control Policy

- Access Control systems are in place to protect the interests of all users of Warley Woods Community Trust computer systems by providing a safe, secure and readily accessible environment in which to work.
- Warley Woods Community Trust will provide all employees and other users with the information they need to carry out their responsibilities in an as effective and efficient manner as possible.
- Generic or group IDs shall not normally be permitted, but may be granted under exceptional circumstances if sufficient other controls on access are in place.
- The allocation of privilege rights (e.g. local administrator, domain administrator, super-user, root access) shall be restricted and controlled.
- Access rights will be accorded following the principles of least privilege and need to know.
- Every user should attempt to maintain the security of data at its classified level even if technical security mechanisms fail or are absent.
- Users are obligated to report instances of non-compliance to Warley Woods Community Trust Manager.

- Access to Warley Woods Community Trust IT resources and services will be given through the provision of a unique Active Directory account and complex password.
- Password issuing, strength requirements, changing and control will be managed through formal processes.
- Users are expected to become familiar with and abide by Warley Woods Community Trust policies, standards and guidelines for appropriate and acceptable usage of the networks and systems.
- Access for remote users shall be subject to authorization by the Trust Manager and be provided in accordance the Information Security Policy. No uncontrolled external access shall be permitted to any network device or networked system.
- The Trust Manager will review access rights on an annual basis, or when an employee's job changes.

18 PRIVACY POLICY

Holding personal data and the ability to look at this data is termed “processing” with the law. Warley Woods Community Trust (WWCT) only obtains and processes data that it requires for specified and lawful purposes. Data is kept up to date and is erased or rectified without delay. WWCT only retains data for as long as is necessary.

WWCT collects and processes personal data from its visitors and supporters in order to keep in touch with information about their bookings and things that it believes will interest them. WWCT collects and processes personal data on staff to comply with legal and contractual requirements. WWCT is open about what data it holds and why it is holding it, so that all individuals are aware of this and can be confident that their data is used fairly, treated confidentially and that their privacy is protected.

Clear information on why their information is being collected and how it would be used is provided to supporters and customers at the point of data collection, with further detailed information about policies, legal rights and procedures being published online. Where consent is needed, this is requested at the point of data collection (in person, or on the telephone).

WWCT complies with all aspects of the General Data Protection Regulation (2018) and the Privacy and Electronic Communications Regulations (PECR). Staff have received training on how to comply with the law.

WWCT only shares data with others where there is a contractual or legal requirement to do so. This is never for marketing purposes.

WWCT only processes data of persons under the age of 16 with the consent of an adult. The data of persons under the age of 16 will never be used for marketing purposes.

WWCT holds a data map of what personal data information is held on different customer and supporter group and in which format and in which locations to enable it to fully comply with the law.

If an individual withdraws consent to being contacted by means to which they had previously given permission this will be done immediately if they inform a member of staff verbally and within 24 hours if they inform the Trust in writing.

If an individual exercises their legal right to be forgotten, WWCT will consult the data map relevant to that individual and will remove that data within 20 working days.

Data retention policy

WWCT is involved in activities which frequently have periods of dormancy. Trust members often lapse but return. Golfers may not play at Warley Woods for many years, but then return. For these reasons the Trust will keep data for ten years before archiving.

As Trust Membership data is used under “legitimate interest” grounds, rather than consent, it would not be appropriate to continue using personal data for marketing mailings after two years from last contact, but data will continue to be kept for ten years so that there will be long term history of that relationship should contact be renewed.

As Golf customer data is used under “consent” grounds, this data can continue to be used for as long as it is held (10 years). Opt-out clauses are contained in all marketing mailings and messages.

Procedures

Establishing Consent:

Documentation asking for personal data needs to inform that person as to why that data is wanted and what would (and would not) be done with it.

There must be boxes for people to tick to opt in to email and paper mailings. Consent can not be assumed.

If data is collected face to face at the till, or on the telephone then the reasons for collecting the data should be explained and boxes for mobile, email and mailing should only be ticked if consent is specifically given. If consent is not clearly given, then the boxes should be left unticked to avoid unwanted contact.

Contact Methods

Post: The Trust does not use post other than to correspond with current Trust members or lapsed members up to two years after last contact. Data is processed under “legitimate interest”.

Email: is used to send news, send volunteer requests and marketing information to golfers. This is done through MailChimp which contains an unsubscribe mechanism in each email. If someone unsubscribes, it is not possible for WWCT to resubscribe them. Particular care must be taken if migrating email lists to a new Mailchimp account, to ensure no unsubscribed persons become resubscribed. In order to ensure this the Trust Manager and Retail and Golf Development Manager should regularly check for unsubscribes to the lists that they use and alter any contact preferences on OSWALD so that this information is accurate for any future data extractions.

Text messages: are only used for marketing to golfers. Each message should include an unsubscribe opt out. The Retail and Golf Development Manager should regularly check for unsubscribes and alter any contact preferences on OSWALD.

Social media: The Trust uses social media messaging when Administrators need to contact an individual about their posting in a group or in response to a question. The individual in question has the opportunity to accept these messages or not. The Trust has the opportunity to send invitations to events through this route, but opts not to do this, in case this would not be welcomed by people who have connected with the Trust for other reasons.

Dealing with subject access requests

An individual has the right to know what data WWCT holds on them. This can include CCTV images. If an individual wishes to exercise this right, then they should put their request in writing, quoting a postal address to the Trust Manager. The Trust Manager then consults the data map relating to the relationship with that person and provides copies of that data by post to the address held on OSWALD within 1 calendar month of receipt of the request. Any

reference to any other individuals should be redacted. If the request is for access to CCTV images, then an appointment should be made within 1 calendar month for that information to be viewed. Other data subjects included in that footage should be obscured to protect their privacy.

If the subject access request is from a third party, such as a local authority, the police, the Trust Manager should handle this request and provide the information if it is required in the execution of a legal right. If the request is made by an emergency response health professional and is needed in order to protect the health or safety of the data subject, then any member of staff can release this information.

Dealing with rectification issues

If an individual indicates that the Trust is holding incorrect data, then changes should be made immediately by the member of staff receiving that request – if by phone or in person. If the Trust is informed by letter or by email, this change should be made within 24 hours of the receipt of the request.

Dealing with right to be forgotten requests

An individual has the right to be forgotten. If an individual wishes to exercise this right, then they should put their request in writing to the Trust Manager. The Trust Manager then consults the data map relating to the relationship with that person and ensures, either directly, or through direction to another member of staff that all records relating to that individual are deleted or destroyed. The Trust should write to the individual confirming that this has been done, but should not retain a copy of the correspondence.

Archiving

Each year in December data which has been inactive for ten years should be archived using OSWALD's archiving module.

Dealing with data breaches

WWCT processes very little data which would be deemed sensitive. However it does process personal data which could be misused to infringe someone's privacy and they have a right for that information to be protected. All computers and database software are password protected. All individuals who have access to personal data have to concur with data protection policies and sign to that effect.

All third parties who have access to data (on external servers, or access to WWCT's server to provide technical support are contractually obliged to safeguard the data they have access to.

In the unlikely event of a data breach, the Trust Manager should be informed and they would need to take immediate action to ascertain the circumstances and whose data might have been compromised. If the breach is serious, based on Information Commissioners Office's (ICO) definition, the ICO should be informed within 72 hours and a significant incident notification made to the Charity Commission. Those individuals affected should be alerted within 36 hours of a notification of any breach.

19 MONITORING POLICY AND PROCEDURES

These policies and procedures will be reviewed on a regular basis to ensure that they are appropriate for effective operating of WWCT. New policies may be added as the need arises. All policies and procedures will be reviewed and approved by the Board of Directors.