

HHF Handbook & Policies



This Handbook sets out the main policies and procedures that are relevant to your work for or on behalf of Herne Hill Forum (**HHF**).

1. Dignity at Work Policy
2. Adult & Child Safeguarding Policy
3. Whistleblowing Policy
4. Health and Safety Policy
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If you have any questions about the contents of this Handbook or what you have to do to comply with any of the policies, you should contact the Officers via info@hernehillforum.org.uk.

The policies and procedures in this Handbook apply to all Committee members, Contractors and Volunteers. This version was approved by the Committee on 29 July 2023, and will be reviewed annually.

They do not form part of the terms of any contract you may have with us, which will be provided to you separately.

Definitions:

“Beneficiaries” – members of the public who are in contact with, or otherwise direct beneficiaries of the activities of, HHF;

“Children and Adults at Risk” - Children and young people (meaning people under the age of 18 years) and adults who may be vulnerable due to, for example, their age, mental health, disability, illness, gender, race, religion or belief, sexual orientation, economic status or who may be unable to take care of themselves against abuse.

“Committee” – the Committee of HHF, including Officers, as described in the Constitution, and for these purposes includes members of any sub-committee

“Constitution” – the extant Constitution of the HHF

“Contractors” – professional staff working full or part-time for HHF on a paid basis, including the Project Manager

“HHF” – The Herne Hill Forum

“Members” – members of HHF

“Officers” – the Officers of the Committee, as described in the Constitution, comprising a Chair, a Vice Chair, Secretary and Treasurer

“Project Manager” – a contractor employed by HHF and assigned this role

“Suppliers” – professional suppliers of goods and/or services to HHF

“Volunteers” – volunteers working for HHF from time to time

1. Dignity at Work Policy

This policy sets out HHF's approach to equal opportunities and dignity at work. It applies to matters including pay and conditions, recruitment, and the treatment of HHF's Committee, Contractors, Volunteers and Suppliers.

Equal opportunities commitment and aims

We are committed to promoting equal opportunities and will not tolerate unlawful discrimination, including victimisation and harassment, or bullying.

We are committed to protecting people, wherever possible, from being victimised or treated less fairly if they make a complaint in good faith under this policy. We will never victimise anyone who makes a legitimate complaint.

How the law defines discrimination

You will receive equal treatment regardless of any protected characteristics. The protected characteristics are: age, race, disability, religion or belief, sex, gender reassignment, pregnancy or maternity, sexual orientation, and marital or civil partnership status.

The following types of acts (whether intentional or unintentional) may both breach this policy and be unlawful:

- **Direct discrimination:** when, because of a protected characteristic, somebody is treated less favourably than someone else has (or would have) been treated in the same circumstances.
- **Indirect discrimination:** when a provision, criterion or practice which applies to everyone puts a group of people with a protected characteristic at a disadvantage (unless the treatment is justified).
- **Harassment:** when a hostile, humiliating, degrading, intimidating or similarly offensive environment is created in relation to a protected characteristic. We also consider it harassment for someone to be subjected to uninvited conduct related to a protected characteristic that, as an intended or unintended consequence, violates their dignity.
- **Victimisation:** when someone who has complained about harassment or discrimination, or supported someone else in their complaint, is then treated less favourably as a result.

Other actions can be unlawful under the equal opportunities legislation, including:

- failure to make reasonable adjustments to minimise certain disadvantages suffered by a disabled person; and
- discriminating against somebody believed to have a protected characteristic, whether or not they actually do, or because they associate with a third party who does.

Harassment and bullying

We are committed to providing a working environment free from harassment, bullying and intimidation.

Examples of bullying and harassment

- Name calling, lewd comments, excluding colleagues, making insensitive jokes.
- Physical, verbal and non-verbal conduct, including things you say or do online, especially on social media.
- Treating another person less favourably because they either submit to harassing behaviour or refuse to do so.

The impact on the victim is important. Your behaviour can amount to bullying or harassment even if you had no idea it would be perceived that way.

Constructive criticism about your behaviour or performance at work from a manager or colleague is not bullying.

How we carry out our responsibilities and duties

Overall responsibility for the effective implementation and operation of this policy lies with the Committee. Everyone working for or on behalf of HHF is expected to act in full accordance with this policy, lead by example, and maintain standards of behaviour.

Concerns

Sometimes issues can be resolved informally and it can be a good idea to speak with the person concerned to explain that their behaviour is unwelcome, inappropriate, or upsetting to you. We understand that it can be difficult to speak with the perpetrator directly, in which case you should raise the issue with an Officer or another Committee member.

We will treat your complaint in confidence, as far as is possible, and we will only share information on a need-to-know basis. We will investigate all formal complaints or allegations regarding breaches of this policy.

2. Adult & Child Safeguarding Policy

Adult Safeguarding Policy

HHF is committed to protecting people who come into contact with our organisation, including Committee members, Contractors, Volunteers, Suppliers and Beneficiaries.

We publish this Safeguarding Policy on our website and we encourage our Beneficiaries and those around them to report any safeguarding concerns to us.

Although our direct interaction with Children and Adults at Risk may be infrequent, we understand the importance of safeguarding them when such contact occurs, such as at HHF events or other related activities.

Safeguarding Lead

Safeguarding Lead – George Hornby, Vice-Chair

Email – info@hernehillforum.org.uk

Safeguarding

We use the term safeguarding to refer to the steps we take to protect people from the risk of harm or abuse that might arise when they come into contact with HHF.

Responsibilities

Committee

HHF's Committee is ultimately responsible for safeguarding and for ensuring that Contractors and Volunteers are competent to carry out their safeguarding responsibilities.

Committee members are committed to making sure that all safeguarding concerns and allegations are taken seriously and responded to appropriately.

The Committee receives reports on any safeguarding issues and is responsible for deciding whether a safeguarding issue should be reported to any external agency or regulator.

Safeguarding Lead

The Committee has nominated George Hornby as the Safeguarding Lead. The Safeguarding Lead reports directly to the Committee and is responsible for:

- ensuring that HHF follows safe recruitment practices that are appropriate to the role and the level of risk;
- working to promote a culture of listening and encouraging people to speak up;
- acting as a point of contact within HHF for safeguarding queries, concerns or complaints;
- ensuring that safeguarding concerns are recorded and are investigated appropriately and in line with this Policy;
- where necessary, liaising with external stakeholders on safeguarding issues.

Committee members, Contractors and Volunteers

Everyone who works for, together or on behalf of HHF shares responsibility for protecting people who come into contact the organisation from harm.

You must:

- familiarise yourself with this Safeguarding Policy and apply it in your work for HHF;
- never exploit vulnerability when carrying out fundraising activities and take all reasonable steps to ensure that donors make informed decisions about any support they choose to give to HHF;
- report any safeguarding concerns or suspicions using the procedure set out below; and
- co-operate with any safeguarding investigation.

Safeguarding Concerns

Safeguarding reports may reach HHF through various routes, including telephone calls, text message, social media, face-to-face discussions, or even rumours. All concerns must be taken seriously.

If someone raises a safeguarding concern with you, you should:

- listen;
- empathise with the person making the report;
- ask who, when, where and what, but not why;
- repeat what you have been told to check your understanding;
- reassure the person that HHF will treat all safeguarding reports as confidential and that information will only be shared on a strictly need-to-know basis; and
- (if the person receiving the report is not the Safeguarding Lead) make a report to the Safeguarding Lead without delay.

You must keep safeguarding reports confidential.

Reporting Concerns

If you have any concerns that someone may be experiencing, has experienced, or is at risk of experiencing, abuse or exploitation you should make a report to the Safeguarding Lead without delay. You should report safeguarding concerns, even if your concern relates to an incident that occurred some time ago.

If you witness a safeguarding incident, or if an incident has just taken place, and you believe someone is at imminent risk of significant harm, you should call the emergency services and then report the matter following the process below.

If you are a contractor or volunteer and you feel unable to raise concerns through the process set out below, you can raise your concerns in accordance with the Whistleblowing Policy.

When you make a report, it is helpful if you can provide details of your concerns including:

- the name(s) of the people involved
- a description of each incident
- the dates, times and location of each incident

Confidentiality

HHF will treat all safeguarding reports as confidential and information will only be shared on a strictly need-to-know basis. This may include sharing information with Committee members, Contractors or external advisers. The only exception is where we are required under any applicable law to make disclosures to a relevant authority.

Anyone who makes a report under this procedure will be protected against any negative repercussions as a result of raising a safeguarding concern.

Action

The Safeguarding Lead will consider the report and will make a decision about how to take the matter forward. This could include:

- carrying out an internal investigation or instructing an external consultant to investigate;
- making a report to external agencies;
- bringing roles to an end;
- suspending or terminating membership; or

- suspension or termination of partnership agreements or other relationships with third parties.

In reaching a decision, the Safeguarding Lead will review all of the available information and may discuss the matter further with the person who reported the concern.

If there is insufficient information to follow up the report and no way to obtain additional information (for example, if the person making the report did not leave their name or contact details), the Safeguarding Lead will keep a record of the report.

Wherever possible, records will be anonymised and used for organisational learning and reporting purposes.

Reporting to the Committee and to external agencies

The Safeguarding Lead will inform the Committee as soon as a safeguarding report is received. The Committee members will be responsible for deciding whether the matter should be reported to a regulator or other external agency. The Committee may delegate authority to make a report to a manager or external agent (for example, a solicitor).

Where appropriate, HHF will refer safeguarding concerns to appropriate external agencies, which may include:

- children's social services or the local Safeguarding Adults Board;
- the NSPCC helpline by telephoning 0808 800 5000;
- law enforcement authorities for criminal investigation;
- the Disclosure and Barring Service (DBS) or equivalent barring authority.

Where applicable, a limited description of safeguarding allegations, incidents or concerns may also be provided to other third parties (for example, our insurers).

Safeguarding Children and Adults at Risk

We are committed to prioritising the safety and well-being of all Children and Adults at Risk who come into contact with HHF.

We understand that our contact with these groups may not be regular, but we are committed to creating an environment that listens, respects, and safeguards their well-being during any instances of contact.

All Suppliers appointed by HHF to perform any activity involving or which may involve working with Children and Adults at Risk must have their own,

appropriate safeguarding and protection policies and procedures in place, and we must ensure that this is in place prior to any formal contracts.

While HHF activities are rarely intended for unsupervised Children or unsupervised Adults at Risk, there may be occasions when such individuals can be expected to be present at a HHF event. Every effort should be made for these attendees to be accompanied by their own responsible adult.

However, if no such responsible adult is present, this policy will apply. Committee members, Contractors, and Volunteers must ensure these individuals' safety and wellbeing during such interactions and report any concerns in line with this policy. In the event that any Committee members, Contractors, or Volunteers are likely to have regular unsupervised contact with Children or unsupervised Adults at Risk, they should receive relevant safeguarding training and be subject to a DBS check, prior to initiating such regular unsupervised contact.

Failure to comply with this policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from HHF.

3. Whistleblowing Policy

Our aim is to maintain the highest standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes.

This policy outlines what you should do if you suspect something happening at HHF is putting you or others in danger, or is illegal or unethical.

Whistleblowing

We encourage you to report concerns without delay – this is called ‘whistleblowing’. You can be assured that we will take your concerns seriously and that there will be no reprisals.

The types of concerns you may want to raise with us by whistleblowing might include:

- activity you suspect is criminal;
- activity you suspect puts health and safety at risk;
- activity you suspect may damage the environment;
- activity you suspect amounts to unlawful bribery or corruption;
- any failure to comply with legal or regulatory obligations;
- any failure to meet professional requirements; and/or
- any attempt to conceal one or more of the above.

Speak to one of the Officers if you are not sure whether something is covered by this policy.

How to raise a whistleblowing concern

You should write to info@hernehillforum.org.uk or, if you prefer, to a Committee member, to say that you would like to raise concerns under this policy and explain what they are. Try to include all the key facts, dates, and names of the people involved.

We will invite you to a meeting to discuss your concerns. After the meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.

We will try to keep you informed about how our investigations are progressing and how long they are likely to take. Sometimes we may be unable to give you details about the investigation as we need to protect confidentiality and comply

with legal obligations. If this happens we will do our best to explain why we are acting in the way we are.

Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want.

Confidentiality and anonymity

You are always encouraged to raise concerns openly. We may want to disclose your identity to people involved in the investigation, but will always discuss this with you first.

We discourage anonymous whistleblowing. Concerns raised anonymously are very difficult (and sometimes impossible) to investigate and it makes it harder for us to reach an informed decision. This is why we urge you not to report matters anonymously.

Reporting externally

This policy outlines the process for raising, investigating, and resolving wrongdoing within HHF. It is unlikely to be necessary for anyone outside HHF to become involved when a whistleblowing allegation is made, but in some circumstances it may be appropriate for you to go to an external body such as a regulator.

The independent charity **Protect** can direct you towards the appropriate regulator for the type of issue you want to raise. You can find more information on their website: <https://protect-advice.org.uk/>, or use their free confidential telephone advice line: 020 3117 2520.

Alerting the media to a concern, particularly before or during an internal investigation, is almost never justified or appropriate. We strongly discourage you from doing so and we would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or Protect, before being justified in approaching the press

4. Health and Safety Policy

This policy sets out our arrangements for seeking to ensure that HHF meets its health and safety obligations to staff and anyone visiting our premises or affected by our work. The Committee is responsible for ensuring health and safety and the operation of this policy.

Our responsibilities

HHF will carry out risk assessments as appropriate for each of our events and projects and identify any measures that need to be taken to control such risks as have been identified;

Your responsibilities

Everyone shares responsibility for achieving safe working conditions. You must:

- take care of your own health and safety and that of others;
- observe applicable safety rules and follow instructions for the safe use of equipment;
- report any equipment fault or damage immediately – do not attempt to repair equipment yourself unless you are trained to do so;
- report any health and safety concerns (including potential hazards, defects or dangers) to info@hernehillforum.org.uk without delay; and
- co-operate with any health and safety investigation.

Accidents and First Aid

All accidents and injuries at work, however minor, should be reported to info@hernehillforum.org.uk and recorded in the accident book which is stored digitally. Where relevant, details of first aid facilities and the names of trained first aiders will be prominently displayed.

Fire Safety

HHF has no workplace but events and projects may involve the use of hired or loaned workplaces, in which case you should familiarise yourself with the fire safety instructions in that workplace.

5. Data Protection Policy

This policy explains how HHF processes the personal data of our members, volunteers, service users, suppliers, contractors, and other third parties, which includes IP addresses collected through our online platforms. It also explains what we expect from you when you process personal data on behalf of HHF. The HHF Project Manager and the Secretary are responsible for overseeing this policy and will respond to questions you may have about this policy or concerns that this policy is not being followed.

Terms

When we talk about **personal data** we mean any information which relates to a living person who can be identified from that data either on its own, or when taken together with other information which is likely to come into our possession. It includes identifiers such as a person's name, ID number, IP address and expressions of opinion about a person's actions or behaviour.

Personal data includes data where the information that identifies the individual has been replaced by a key or code that is kept separately (**pseudonymised** personal data).

Personal data does not include anonymous data, i.e. data that has had the identity of an individual permanently removed.

We use the term **special category data** to mean personal data that reveals an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

Criminal offence data means personal data relating to criminal convictions and offences (for example, information about criminal activity, allegations, investigations and proceedings) and can include information about unproven allegations and information relating to the absence of convictions. It also covers related security measures, such as personal data about penalties and conditions or restrictions placed on an individual as part of the criminal justice process.

When we refer to **processing** we mean any activity that involves the use of personal data. Processing includes obtaining, recording or holding personal data, or carrying out any operations on the data such as organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes sharing or transferring personal data with third parties.

HHF must adhere to the data protection principles, which require personal data to be:

- processed lawfully, fairly and in a transparent manner;
- collected only for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary for the purpose it is processed;
- accurate and where necessary kept up to date;
- not be kept in a form which permits identification of the individual for longer than is necessary for the purpose it is processed;
- processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Whenever HHF processes personal data, we must take responsibility for what we do with it and we must keep sufficient records to be able to demonstrate our compliance with these principles. This is known as the accountability principle.

Lawful, fair and transparent

We must only process personal data for specified lawful purposes. Our privacy notices contain more detail about the lawful purposes HHF uses to process personal data.

Whenever we collect personal data directly from someone, we must give them a copy of (or provide them with a link to) our privacy notice (<https://www.hernehillforum.org.uk/privacy-policy/>).

If we collect personal data from a third party or from a publicly available source, we must provide the individual with a copy of our privacy notice as soon as possible and not later than one month after we collect their personal data.

Specified, explicit and legitimate purposes

We must only process people's personal data for specified, explicit and legitimate purposes and we must not use their personal data in any way that is incompatible with those purposes.

If you want to use personal data for new or different purposes, you must first inform the individual and you may need to obtain their consent. You should speak to the HHF Project Manager if you are unsure about whether your use of personal data is compatible with the original purpose for which the personal data were collected.

Adequate, relevant and limited to what is necessary

You must only process personal data if you need it for the work you do for, or on behalf of HHF and you are authorised to do so. You must not process personal data for any reason unrelated to your duties.

You must not collect more personal data than you need and you must ensure that any personal data collected is adequate and relevant for the intended purposes. You should not make unnecessary copies of personal data.

You should regularly review and update personal data which you have collected. When personal data is no longer needed for the specified purposes, it must be deleted or anonymised (see 'Storage Limitation' below).

Accurate and up to date

You must ensure that the personal data you process is accurate, complete, kept up to date and relevant to the purpose for which it was collected.

You must check the accuracy of any personal data when you first collect it and at regular intervals afterwards. You must take all reasonable steps to destroy or amend inaccurate or out of date personal data without delay (see 'Storage Limitation' below).

Storage Limitation

You must not keep personal data for longer than necessary for the purpose or purposes it was originally collected (including for the purpose of satisfying any legal, accounting or reporting requirements).

You must take all reasonable steps to destroy or erase from our systems all personal data that we no longer require. This may require you to tell third parties to delete personal data that we have shared with them.

Security

We have in place safeguards to ensure that we process personal data securely and to protect against unauthorised or unlawful processing, accidental loss, destruction or damage.

You must take reasonable and appropriate security measures when you process personal data on behalf of HHF. You should exercise particular care to protect special category data and criminal offence data.

You must follow all procedures and use all technologies we put in place from time to time to maintain the security of personal data. In particular, you must:

- only transfer personal data to trusted third-party service providers that have in place adequate measures to protect the personal data;
- password protect personal data before transferring it electronically to an authorised external contact;
- not share personal data with unauthorised people;

- use strong passwords;
- lock your computer screens when not at your desk;
- lock drawers and filing cabinets – do not leave paper with personal data lying around;
- dispose of personal data securely when you have finished with it.

Transfers outside the UK

Data protection law places restrictions on transfers of personal data to countries outside the UK. This is to ensure that the level of protection afforded to people's personal data in the UK is not undermined.

There are safeguards which allow us to lawfully transfer some personal data to countries outside the UK. These include:

- transfers to countries that the UK has designated as providing an adequate level of protection for people's rights and freedoms;
- transfers to third parties that have entered into approved contracts with us covering the transfer;
- exceptional circumstances where the individual has given explicit consent to the transfer after being informed of any potential risks; and
- where the transfer is necessary for one of the other limited reasons set out in data protection law, including the performance of a contract between us and the individual.

You must not transmit or send personal data to a different country, or allow people outside the UK to view or access HHF personal data, unless you are confident that one of these safeguards is in place. If you are in any doubt, you should speak to the HHF Project Manager before transferring personal data outside the UK.

Data protection impact assessments

HHF must undertake a data protection impact assessment (**DPIA**) if we plan to process personal data in a way that is likely to result in a high risk to individuals. It is also good practice to conduct a DPIA for major projects which will require us to process personal data.

We will usually conduct a DPIA when we implement major system or business change programs which involve processing personal data, such as:

- use of new technologies (programs, systems or processes), or changing technologies;
- automated processing (including profiling) such as the use of personal data to evaluate personal preferences, interests, behaviour, location or movements;

- novel processing of special categories of personal data or criminal offence data;
- regular data sharing with a third party; or
- systematic monitoring of a publicly accessible area.

You should contact the HHF Project Manager if you think it may be necessary to conduct a DPIA in relation to work that you are carrying out for HHF.

Personal data breaches

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The following are examples of personal data breaches:

- access by an unauthorised third party (e.g. our systems are hacked);
- deliberate or accidental action (or inaction) by one of our suppliers which leads to our personal data being shared in an unauthorised way;
- sending an email containing personal data to an incorrect recipient;
- IT devices containing personal data being lost or stolen;
- loss of availability of personal data (e.g. our systems go down and we do not have information backed-up).

If you know or suspect that a personal data breach has occurred, you must contact the HHF Project Manager without delay.

We may ask you to provide more information to help us to investigate the breach. You should keep all evidence relating to the breach and, if possible, you should take any steps that might reverse or minimise the risks. This might include:

- recalling an email that was sent to the wrong person;
- asking someone to return a hard copy of a document they should not have received;
- seeking back-up copies of information that can be recovered.

The Project Manager keeps a record of all personal data breaches, on behalf of the Committee. In certain circumstances, we must notify the Information Commissioner's Office (ICO) and the individual about a personal data breach. All decisions about whether to make a report will be taken by the Committee.

Individual rights

Individuals have rights in relation to how we process their personal data, including the right to:

- receive the information contained in our privacy notices;
- withdraw their consent to processing at any time;
- request access to their personal data (known as a 'subject access request');

- stop us using their personal data for direct marketing purposes;
- ask us to erase their personal data if it is no longer necessary for the purpose it was collected;
- rectify inaccurate data or to complete incomplete data;
- restrict processing;
- object to processing on the basis of our legitimate interests;
- object to decisions based solely on automated processing, including profiling;
- make a complaint to the ICO; and
- receive or ask for their personal data to be transferred to a third party.

If someone makes a request to exercise one of these rights, or if you think someone may be trying to exercise one of these rights, you must inform the HHF Project Manager without delay. We will usually have one month in which to respond.

Unless you are authorised to do so, you should not attempt to respond to a request by an individual to exercise any of the rights listed above. Some of these rights only apply in certain situations and some may require HHF to take legal advice before responding.

You must not provide personal data to anyone in any circumstances without first verifying the identity of the individual making the request. Do not allow third parties to persuade you to disclose personal data without proper authorisation.

6. Environment Policy

HHF has been created for the express purpose of furthering the social economic and environmental well-being of Herne Hill. HHF will seek to act in an environmentally sustainable way and to encourage residents, visitors and businesses to do the same.

7. Privacy Notice

This privacy notice explains how HHF uses your personal data when you work for or on behalf of us or when you sit on the Committee. We are a **controller** of your personal data, which means we are responsible for deciding how we hold and use data about you.

You should read this privacy notice along with our Data Protection Policy, which explains what we mean when we talk about 'personal data' and 'processing'.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

Your personal data

We may collect and process the following types personal data about you:

- full name and title
- personal contact details (home address, home telephone number, mobile telephone number, personal email address)
- date of birth
- gender
- marital status and dependants
- next of kin and emergency contact details
- National Insurance number
- bank account details, accounting records and tax status information
- photographs
- expense account
- contract details, including pay and benefits history
- copy of driving licence and/or car insurance details
- recruitment information (including copies of right to work documentation, references and other information included in your CV and covering letter or as part of the application process)
- personnel records (including job titles, work history, working hours, training records and professional memberships)
- information about your use of our information and communications systems
- information about criminal convictions and offences
- leaving date and your reason for leaving

We may also collect and use special category data such as:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions

- trade union membership
- information about your health, including any medical condition, health and sickness records, health assessment reports and accident records
- details of any absences

We collect the majority of this personal data directly from you during the application and recruitment process and during the period you work for us. We also collect additional personal data from third parties including former employers and other background check agencies such as:

- your named referees;
- the Disclosure and Barring Service;
- publicly accessible data from the Insolvency Service, Companies House and/or the Charity Commission.

How we use your personal data

We will only use your personal data when law allows us to. Our reasons for using your personal data may sometimes overlap and there may be several lawful grounds which justify our use of your personal data.

We will use your personal data in the following ways where it is necessary to perform a contract we have entered into with you and/or where we need to comply with a legal obligation, including:

- checking you are legally entitled to work in the UK
- determining the terms on which you work for us
- paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions
- complying with health and safety obligations

We will also use your personal data where we have a legitimate interest and we are satisfied that your interests and fundamental rights do not override our interests, including:

- making a decision about your recruitment or appointment
- administering the contract we have entered into with you
- business management and planning, including accounting and auditing
- making decisions about pay reviews and compensation
- assessing qualifications for a particular job or task, including decisions about promotions
- making decisions about your continued engagement
- making arrangements for the termination of our working relationship
- education, training and development requirements

- dealing with legal disputes involving you, or other workers or contractors, including accidents at work
- ascertaining your fitness to work
- managing absence
- to prevent fraud
- to monitor your use of our information and communication systems
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- to conduct data analytics studies to review and better understand staff retention and attrition rates

Less commonly, we may use your personal data:

- where we need to protect your vital interests (or someone else's vital interests) or
- where it is needed in the public interest or for official purposes

How we use special category data

We may use your special category data when we:

- use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, and to monitor and manage sickness absence
- use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting

We rely on the following lawful grounds when we use your special category data in this way:

- where we need to carry out our legal obligations or exercise rights in connection with employment, social security or social protection law
- in limited circumstances, with your explicit written consent
- where it is needed in the public interest, such as for equal opportunities monitoring

Less commonly, we may use special category data where it is needed in relation to legal claims, to protect your vital interests (or someone else's vital interests) in circumstances where you are not capable of giving your consent, or where you have already made the information public.

How we use criminal offence data

We will collect and use criminal offence data when it is appropriate, taking into account the nature of your role and where we are legally able to do so, for example:

- if we are required by law to carry out criminal records checks for those carrying out the role
- if your role requires a high degree of trust and integrity

We rely on the following lawful grounds when we use your criminal offence data in this way:

- when we need to in order to carry out legal rights and obligations in connection with your employment
- there is a substantial public interest
- you have given your explicit consent

Where appropriate, we will collect criminal offence data as part of the recruitment process and/or at regular intervals during your working relationship with us. We may also be notified of such information directly by you in the course of you working for us.

Sharing your personal data

We may share your personal data with third parties from time to time, including our service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

We will only disclose your personal data to third parties:

- if required by law
- where it is necessary to administer the working relationship with you or where we have another legitimate interest such as sharing your personal data with a funder or regulator (e.g. making returns to HMRC)
- where you have given us consent to share your data with a specific third party

We may share your personal data with another third-party on a temporary or permanent basis for the purposes of a joint venture, collaboration, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor organisation.

Other information

You should refer to our Data Protection Policy for information on:

- the measures we have put in place to protect the security of your personal data and to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed;
- transfers of personal data outside the UK;

- retention of personal data; and
- your individual rights, including the right of access.

8. Feedback and Complaints Procedure

HHF aims to provide the means by which the local community can come together to make our neighbourhood a better place to live, work and visit. To do this, we work with our members, local people, partners, stakeholders and volunteers.

We realise that there may be times when people are dissatisfied with HHF or when HHF's work does not meet the standards we set for our organisation. When this happens, we want to hear about it so we can deal with the situation, learn from it, and improve.

This procedure explains how you can give feedback or make a complaint about HHF and sets out how we will respond.

Tell us if you are not happy

If you are dissatisfied with one of HHF's Committee Members, Contractors or Volunteers, we encourage you to tell the person why you are unhappy as you may be able to resolve the matter with them. If you would not feel comfortable speaking to the person directly, or if you are dissatisfied with their response, you can follow the procedure set out below.

How to give feedback or make a complaint

If you wish to give feedback or make a complaint about HHF you can send an email to info@hernehillforum.org.uk.

Please include your name and your preferred contact details so that we can get back in touch with you. If you are making a complaint, please state that you are making a complaint; explain what it relates to and, if possible, tell us how you would like to see it resolved.

We will make a record of your feedback or complaint. If you want to know how we will use your personal data, you can find our privacy policy here www.hernehillforum.org.uk/privacy-policy. In connection with your Complaint, we will keep your personal data private in accordance with our Privacy Notice above.

HHF cannot respond to complaints made anonymously. We will always do our best to investigate an anonymous complaint and, where applicable, to use the information provided to learn and improve.

Responding to complaints

We will aim to respond to complaints within twenty working days. On occasions, it may not be possible to resolve the matter within this time period and, if we think it will take longer, we will let you know.

We will give you the name and contact details of the person who is managing your complaint and we will do our best to ensure that your complaint is dealt with by someone who is unconnected to the matter you have complained about.

In certain cases, HHF may decide to pass a complaint to a regulator or to another external agency such as the police if we suspect the complaint may involve illegal activity.

From time to time we may receive complaints that do not relate directly to our work or something that HHF has done. We are a community organisation with limited resources and we will not comment on, or engage in discussion about, issues that are unrelated to our work.

If you are not satisfied with our response

We will do our best to resolve your complaint to give you the outcome you want, but we cannot guarantee that a particular remedy will be offered.

If you are unhappy with the response we have given to your complaint, you can send a letter or email to our Officer team at info@hernehillforum.org.uk, and one of our Officers who was not involved in handling the original complaint will review.

Please include a summary of your complaint, explain why you are not satisfied with the response you have received. The Officer will share this information with HHF's Committee at the next Committee meeting.

9. Financial Controls and Fundraising

HHF will maintain a UK-based bank or building society account or accounts (the "Account") in its name 'The Herne Hill Forum', and such accounts will each be managed by at least two unrelated and authorised individuals who are both Officers.

Authority to manage the Accounts can only be conferred by the Committee, and such a decision by the Committee must be minuted as evidence.

All expenditure must be authorised in advance by the Committee, as evidenced by Committee meeting minutes. In cases where expenditure needs to be authorised urgently, and a decision cannot wait for the next Committee meeting, it can be agreed by e-mail and ratified at the next Committee meeting.

All payments from the Accounts must be labelled within the Account with the name of the project in connection with which the payment is made, or the expense category if not associated with a project, in order to enable proper accounting and to account to organisations or individuals providing us with grants.

No payment may be made by an authorised Officer where there is not evidence of such payment being authorised as above. In relation to Contractor time, such time must be authorised in advance by the Committee.

The Treasurer will physically table bank statements for all of the Accounts at each Committee meeting, covering transactions at least for the last 6 months; for confidentiality, in particular regarding payments to contractors, they can be reviewed by any Committee member present but may not be copied or removed.

Officers must have oversight of all fundraising activity and should ensure that it complies with The Code of Fundraising Practice (available at <https://www.fundraisingregulator.org.uk/sites/default/files/fr-code/English-Code-of-Fundraising-Practice-October-2019.pdf>) and the Institute of Fundraising's guidance 'Treating Donors Fairly' (available at <https://ciof.org.uk/loF/media/IOF/Header%20images/Treating-donors-fairly.pdf?ext=.pdf> [34]).

10. Code of Conduct for Committee members

1. About this Code of Conduct

1.1 This code of conduct is applicable to all Committee members of Herne Hill Forum. Its purpose is to provide Committee members with clear guidelines as to their standard of behaviour, responsibilities and best practice.

2. Values

2.1 Committee members must uphold the following values of HHF.

Selflessness

2.2 Committee members have a general duty to act in the best interests of HHF. They should not act in order to gain financial or other benefits for themselves, their family, their friends or any other organisation to which they are connected.

Integrity

2.3 Committee members should:

2.3.1 not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their role;

2.3.2 avoid impropriety, as well as any appearance of improper behaviour; and

2.3.3 avoid accepting gifts and hospitality that might reasonably be thought to influence their judgment.

Objectivity

2.4 In carrying out their role, Committee members should ensure that decisions they make are based solely on merit.

Accountability

2.5 Committee members:

2.5.1 must comply with the law at all times;

2.5.2 are accountable for their decisions and actions to the public, stakeholders, funders, the courts, relevant regulators and the Members and beneficiaries of HHF; and

2.5.3 must submit themselves to such scrutiny that is appropriate to their role.

Openness

2.6 Committee members should:

2.6.1 maintain an atmosphere of openness throughout the organisation to promote confidence of the public, other Committee members, Members, Contractors, Volunteers, Suppliers and Beneficiaries

2.6.2 ensure that confidential material is handled in accordance with due care; and

2.6.3 be as open as possible about their decisions and the action that they take and restrict information only where the best interests of HHF demand this.

Honesty

2.7 Committee members have a duty to declare any interests relating to their role and to take steps to resolve any conflicts that may arise.

Leadership

2.8 Committee members should promote and support the principles of leadership by example and have professional relationships with any staff of HHF.

3. Committee meetings

3.1 Committee members must:

3.1.1 strive to attend all Committee and other meetings and appointments and give apologies ahead of time if unable to attend;

3.1.2 prepare adequately for all meetings and work for HHF, including reading papers;

3.1.3 actively engage in discussion, debate and voting in meetings;

3.1.4 maintain a respectful attitude towards others and contribute in a considered and constructive way, listening carefully and challenging sensitively;

3.1.5 participate in collective decision making, accept a majority decision of the Committee and not act individually unless specifically authorised to do so; and

3.1.6 accept the authority of the Chair, or any other person so nominated for in the Chair's absence, to run meetings.

4. Relations with others

4.1 Committee members must:

4.1.1 endeavour to work considerately and respectfully with all those they come into contact with HHF;

4.1.2 seek to support and encourage all those they come into contact with at HHF; and

4.1.3 not make public comments about HHF to the media or in any other public forum (including on social media) without the prior knowledge and approval of the Chair.

5. Leaving the Committee

Committee members must be aware that substantial breach of any part of this Code may result in procedures being put in motion that may result in a Committee member ceasing to be a Committee member. A Committee member who wishes to cease to be a Committee member must inform the Chair in advance in writing, stating reasons for resigning.

I have read and understood the Code of Conduct for Committee members and agree to abide by the standards set out.

Signed _____ **Dated** _____