



*Helping ex-prisoners rebuild their lives*

**NEW FOUNDATIONS  
COMMUNITY CHAPLAINCY  
GOVERNANCE HANDBOOK**

# **THE NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

## **GOVERNANCE HANDBOOK**

### **Introduction**

This is the governance and legal handbook of the New Foundations Community Chaplaincy (NFCC). It does not form part of any employment contract or volunteer agreement but does set out the policies, practices and procedures of the charity as agreed by the Board of Trustees.

This handbook supports and enhances the Operational Handbook which provides practical direction and advice regarding the way in which the staff and volunteers of NFCC are expected to conduct themselves when working for the charity.

This handbook is formed of a series of policies and statements which are in place to ensure that the organisation meets the legal and procedural requirements of UK law, the expectation of our regulators (the Charity Commission), and the membership demands of 3SC, which is a social enterprise umbrella body providing a recognised due diligence stamp for NFCC.

The various policies and statements contained herein will be updated and approved on a regular schedule to ensure that they continue to meet ever-evolving changes to the charity's operating environment and regulation. The review schedule follows the table of contents.

The Board of Trustees are ultimately responsible for all NFCC policies, practices and procedures. However, any questions regarding the content of this handbook should be passed to the Project Manager.

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## **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

### **POLICY AND STATEMENT TRACKING MATRIX**

	<b>POLICY</b>	<b>LAST UPDATE</b>	<b>REVIEW INTERVAL (YEARS)</b>	<b>NEXT REVIEW</b>
1	Strategic Summary	12 Feb 2021	1	Nov 2021
2	Risk Management *	12 Feb 2021	5	2026
3	Safeguarding	12 Feb 2021	1	Feb 2022
4	Information Security	12 Feb 2021	3	2024
5	Confidentiality Policy and Procedures	12 Feb 2021	3	2024
6	Health and Safety	12 Feb 2021	5	2026
7	Business Continuity	12 Feb 2021	5	2026
8	Equality and Diversity	12 Feb 2021	5	2026
9	Modern Day Slavery	12 Feb 2021	5	2026
10	Conflict of Interest and Anti-Bribery	12 Feb 2021	5	2025**
11	Environment and Sustainability	12 Feb 2021	5	2025**
12	Child Exploitation and Extremism	12 Feb 2021	5	2025**
13	Whistleblowing	12 Feb 2021	5	2025**
14	Complaints	12 Feb 2021	5	2024
15	Grievances	12 Feb 2021	5	2025
16	Quality Assurance	12 Feb 2021	5	2026

\*Risk management policy is reviewed every 5 years, but live risk matrix is reviewed at every Trustee Board meeting.

## **SECTION 1**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

#### **STRATEGIC SUMMARY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (Nov 22)

**Amended:**

#### **WHAT IS OUR CHARITABLE PURPOSE?**

- To promote the rehabilitation and resettlement of ex-offenders in Hampshire, by providing mentoring, advice, practical support and training.

#### **WHAT IS OUR VISION?**

“That no individual should leave prison and arrive in, or return to, our community and feel isolated, rejected or unsupported.”

#### **OUR MISSION - WHAT DOES NFCC ACTUALLY DO TO HELP REACH THE VISION?**

- (1) facilitates the rehabilitation of ex-offenders (the clients) by establishing mentoring relationships and working in partnership with public, private and voluntary sector agencies to help reduce the chance of recently released prisoners re-offending;
- (2) encourages Christian churches to engage in supporting the rehabilitation of ex-offenders through mentoring;
- (3); trains, develops, equips and empowers Christian volunteers to provide holistic support to the charity's clients;
- (4) enlists the help of local Christian churches to assist ex-offenders overcome the difficulties of reintegrating into the community and, where appropriate, encourages connections between ex-offenders and church communities;
- (5) provides advice and resources to assist ex-offenders in resettling into the community;

#### **WHAT IS A MENTORING RELATIONSHIP?**

Mentoring is holistic support delivered on a 1-to-1 basis. We seek to carefully and productively engage in the lives of people who may be deeply troubled, disaffected, depressed or anxious, and/or feel isolated. Perhaps struggling with the effects of substance abuse and troubled relationships – in every way on the margins of society

The mentoring support we offer falls into three categories:

1. Practical help – Helping to meet immediate needs such as getting benefit allowances, opening a bank account, securing proper ID, registering with a GP, signposting to specific services and job seeking. We also act as advocates during interviews with housing, Job Centre and the Probation Services.

2. Emotional support – We understand that clients may have emotional damage and have experienced trauma from a turbulent past. We will actively listen and seek to understand their situation so that we can provide encouragement, insight and acceptance.

3. Wise guidance – We help our clients to lay a stable foundation for the future. This is an essential part of any long-term plan and involves things like helping to set and achieve goals, developing good money management techniques, building a routine of self-care and self-control, qualifying for employment and finding positive relationships.

## **WHAT IS THE REQUIREMENT? WHY IS MENTORING SUPPORT NEEDED?**

Research shows that:

- 64% of prisoners released after less than 12 months reoffend within 12 months.<sup>1</sup>
- Those who feel more connected to others in a non-criminal community are more likely to stay away from crime.<sup>2</sup>
- Ex-prisoners who have not reoffended identify that having someone believe in them is an important factor preventing recidivism.<sup>2</sup>
- People are not inherently bad. They often become involved in crime because of lack of opportunity. Eg:
  - <1% of children spend time in care. >50% of offenders spent time in care.<sup>3</sup>
  - 62% of people in prison have reading age of 11 or lower.<sup>1</sup>
- Life disadvantage is a significant reason why people end up in prison and they are further disadvantaged by being ex-prisoners.
  - 86% of employers of ex-offenders rate them as good at their job, but...<sup>3</sup>
  - Only 17% of ex-prisoners are in PAYE employment one year after release.<sup>1</sup>
    - Ex-offenders who get a job after prison are much less likely to reoffend.<sup>4</sup>

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<sup>1</sup><http://www.prisonreformtrust.org.uk/Portals/0/Documents/Bromley%20Briefings/Prison%20the%20facts%20Summer%202019.pdf>

<sup>2</sup> <https://www.gov.uk/government/publications/results-from-the-surveying-prisoner-crime-reduction-survey>

<sup>3</sup> <http://www.prisonreformtrust.org.uk/Portals/0/Documents/caresteppingstonetocustody.pdf>

<sup>4</sup> [Employing prisoners and ex-offenders - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/publications/employing-prisoners-and-ex-offenders)

We believe that a good mentor will demonstrate that someone cares, and will practically help the ex-prisoner to find a home, a job and a place in society. Our aspiration is for this support to reduce the chance of them re-offending.

## **WHAT ARE NFCC'S VALUES?**

### **Caring**

- We care about our service users and are committed to engaging with them in a compassionate way.
- We are non-judgemental and believe those we support are not defined by their past.
- We believe all prison leavers can become valuable members of society.
- We seek to act kindly in our engagement with those having a chaotic lifestyle.

### **Professional**

- We are trustworthy and reliable in our provision of holistic support.
- We adhere to established protocols, regulatory guidance and boundaries.
- We seek to build professional relationships with our service users' primary support workers.
- We use a Knowledge Base to maintain best practice in the advice and guidance we give.

### **Practical**

- We take a realistic approach as we assist with goal-setting and problem-solving.
- We are resourceful role models, mentoring out of our own life experiences.
- We work alongside individuals to find workable ways to overcome obstacles.
- We help people to think through the implications of the choices facing them.

### **Empathetic**

- We believe ex-offenders have a voice, therefore we practice active listening.
- We are realistic about the problems that confront those seeking to reintegrate into the community.
- We engage in an understanding way to help service users work within their existing constraints.
- We model acceptance and the value of community in our support.

## **WHAT IS THE RELEVANCE OF NFCC'S CHRISTIAN ETHOS?**

Mentoring support is a natural expression of a Christian's 'servant heart' and love for fellow human beings. 'Let each of you look not only to his own interests, but also to the interests of others.' (Philippians 2:3-5).

Christians are motivated by God's love and compassion and are called to do 'good works' (Ephesians 2:10). We believe in the transforming power of hope, caring, forgiveness, perseverance and patience which are exemplified by the Christian faith.

NFCC staff and volunteers will always be happy to pray with or for others, or to discuss their faith if asked to do so. But they will not proselytise their faith upon anyone, and they will never judge.

NFCC staff and volunteers will offer their service to those of any faith or no faith at all.



## **SECTION 2:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

### **RISK MANAGEMENT POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 26)

**Amended:**

#### **INTRODUCTION**

1. This policy considers the way in which NFCC manages the risk of events occurring, or issues arising, which could affect the charity. NFCC's trustees are committed to the regular review and assessment of any risks which have the potential to impact on the charity's ability to achieve its objects. This document establishes the process by which this commitment is enacted.
2. By managing risk effectively, trustees ensure that:
  - a. All significant and credible risks are considered, thus enabling timely and informed decisions to be made and mitigating actions taken.
  - b. The charity regularly improves its policies, procedures and practices such that any credible outcomes will be managed effectively.
  - c. The need to respond reactively to unexpected issues is reduced.
  - d. The charity's aims are achieved.

#### **CHARITY COMMISSION GUIDANCE**

3. Charity Commission guidance is contained within Guidance Publication CC26 (Charities and Risk Management). This policy is aligned with that guidance.

#### **PROCESS**

4. Trustees accept that the charity must carry a certain amount of risk, and do not seek to be risk averse. They are willing to accept a certain amount of risk if, on balance, it can be justified by the benefit which will be achieved in progressing the charity's objects. However, they seek to ensure that any identified risk will be managed correctly, and unnecessary risk will be avoided. This policy seeks to ensure that risks are:

- Identified.
- Assessed.
- Evaluated.
- Managed
- Reviewed.

## RESPONSIBILITIES

5. Ultimate control of the charity and overall responsibility for its management rest with the trustees. They are therefore responsible for setting and upholding this policy, and for establishing the parameters of the risk management process.
6. A nominated trustee, to be known as the Risk Manager, is responsible for advising the Board on risk related issues and for maintaining the risk matrix.
7. Unless another person is specifically delegated, the Project Manager is responsible for delivering the mitigating activity as directed by the trustees.

## RISK MATRIX

8. Trustees assess and control risk through the risk matrix. It is a 'living document' and will be reviewed and adjusted at every board meeting. A proforma with examples is at the Annex to this document. The risk matrix fulfils the following functions:
  - a. Identification of risk. In the run up to each meeting trustees are to review the current matrix and consider whether they agree with current assessments and whether any risks are not yet included. At the meeting emerging and changing risks are discussed. New risks may be the result of:
    - i. New projects or activity.
    - ii. Lessons learned by other charities.
    - iii. Charity Commission advice.
    - iv. New or developing legislation or regulatory guidance
    - v. Incidents that have occurred in the charity's operations.
    - vi. Fresh thinking.
  - b. Assessment of risk. Each risk is assessed by considering the likelihood of that issue occurring, and the impact on the charity's ability to achieve its objects if it did occur. An assessment figure is to be placed against both 'likelihood of occurrence' and 'impact in event of occurrence.' These two figures will then be combined to create an 'overall risk assessment.' The figures are generated in accordance with the following guidance:
    - i. Likelihood of occurrence (without specific management action).
      1. Remote - Unlikely to ever happen.
      2. Unlikely - Might occur in a few rare circumstances.
      3. Possible - Will probably occur at some point, but very rarely.
      4. Probable - Would be expected to occur within next 5 years.
      5. Highly probable - Would be expected to occur fairly frequently.
    - ii. Impact on ability to achieve charity's objects in event of occurrence.
      1. Insignificant - No impact on service or reputation. Litigation risk remote.

2. Minor - Slight impact on service or reputation. Minor litigation possible.
3. Moderate - Some disruption to overall outputs, or small-scale projects may be stopped. Potential for adverse publicity which could be minimised with careful handling. Minor litigation likely.
4. Major - Overall outputs disrupted. Adverse publicity unavoidable. Major litigation issues possible. Potential to damage long term reputation of the charity.
5. Extreme - Service interrupted on long term. Major (national) adverse publicity. Major litigation expected. Resignation of senior management expected. Long term viability of charity called into question.

The calculation used to generate a figure for Overall Risk Assessment is:

$$\text{Likelihood} \times (2 \times \text{Impact})$$

This formula weights the generated Overall Risk Assessment towards those risks which would have a more serious impact on NFCC even if they are less likely to happen.

- c. Managing of Risks. Once risks have been identified and assessed they must be managed. At each meeting trustees will consider those risks which carry the greatest overall risk. In assessing each risk, they have the following options:
  - i. **Avoid**. Stop the activity from which the risk is generated.
  - ii. **Transfer**. Move the risk to another organisation (For example through an insurance policy or contracting activity to a third party).
  - iii. **Mitigation to reduce** the risk. (For example, through training, policy or limiting where/when an activity may occur).
  - iv. **Accept** the risk and carry on.
- d. Residual Risk. After action has been taken the trustees will make a subjective decision as to what level of residual risk remains.

## CONCLUSION

9. The trustees of NFCC accept that certain risks will inevitably arise whilst conducting the activities through which the charity achieves its objects. However, they are committed to reducing and managing any such risks to the best of their ability.

## ANNEX TO NEW FOUNDATIONS COMMUNITY CHAPLAINCY RISK MANAGEMENT POLICY

### EXAMPLE OF A RISK MATRIX

Likelihood Descriptors (Likelihood of occurrence without specific management action).

Assumes current policies and procedures are followed, but accepts occasional shortfalls or exceptional poor practice.

1. Remote - Unlikely to ever happen.
2. Unlikely - Might occur in a few rare circumstances.
3. Possible - Will probably occur at some point, but very rarely.
4. Probable - Would be expected to occur within next 5 years.
5. Highly probable - Would be expected to occur fairly frequently.

Impact Descriptors (Assessment of the impact of an issue after immediate response action).

1. Insignificant - No impact on service or reputation. Litigation risk remote.
2. Minor - Slight impact on service or reputation. Minor litigation possible.
3. Moderate - Some disruption to overall outputs, or small-scale projects may be stopped. Potential for adverse publicity which could be minimised with careful handling. Minor litigation likely.
4. Major - Overall outputs disrupted. Adverse publicity unavoidable. Major litigation issues possible. Potential to damage long term reputation of the charity.
5. Extreme - Service interrupted on long term. Major (national) adverse publicity. Major litigation expected. Resignation of senior management expected. Long term viability of charity called into question..

Overall Risk Assessment = Likelihood x (2 x Impact)

Colour scheme:

Overall Risk Assessment: <20 Green. 20-30 Amber. >30 Red.

Residual Risk: Subjective Trustee assessment. Comfortable - Green. Revisit regularly - Amber. Immediate further action required - Red.

	Potential Risk (There is a risk of....)	Potential Impact	Like li-hood	Impact	Overall risk assessment	Control procedure/ Mitigation	Residual risk	Responsible person	Management and monitoring process	Further action required	Change	Comment
<b>1. GOVERNANCE</b>												
1.1	A lack of direction, strategy and forward planning	No strategic reference for decisions.  Operations not conducted in a manner approved by trustees.  Poor reputation.	2	3	12	Trustee induction creates clear understanding of responsibilities.  Strategic plan formalises aims, objectives and policies.	Low	Chair	Annual consideration of strategic plan.	None	Steady	
<b>2. OPERATIONAL</b>												
2.1	Client abuses volunteer.	Harm to volunteer.  Loss of confidence amongst all stakeholders.  Severe reputational damage.  Litigation likely.	3	4	24	Careful assignment of clients.  Formal procedures.  Training  Pastoral supervision programme for volunteers.	Mod	PM	Appraisal process.	None	Increase	

<b>3. FINANCIAL</b>												
<b>3.1</b>	Funding used incorrectly. (Eg. Outside restricted funding limitations)	Funds withdrawn and liability to repay funders.  Loss of confidence of funders.	3	4	24	Formal impact reporting.  Bring up system for reporting to restricted funders.	Low	Treasurer	Quarterly reports to trustees.  Annual audit.	None	Decrease	
<b>4. EXTERNAL</b>												
<b>4.1</b>	A weak public image or poor understanding of the role of the charity amongst beneficiaries with potential funders.	Reduced funding.  Reduced number of clients.  Reduce number of volunteers.	3	3	18	Regularly updated communications plan.  Good quality reporting of activities and annual impact statement.  Social media presence.	Low	PM	Progress on communications strategy and target data reported to trustees at each Board Meeting.  Ad hoc questions by trustees within the stakeholder community.	Review of website in 2022.	Steady	
<b>5. COMPLIANCE WITH LAW AND CHARITY REGULATIONS</b>												
<b>5.1</b>	Failing to comply with legislation and regulations appropriate to the activities being conducted.	Fines, penalties or censure.  Litigation for negligent activities.  Reputational damage.  Regulatory action.	3	4	24	Suitably qualified and trained volunteers.  Allocation of responsibilities for key compliance procedures.	Low	PM		None		

## **SECTION 3:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

#### **SAFEGUARDING POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 1 year) (Feb 22)

**Amended:**

Note: Where either 'children', 'young people', 'adults at risk' or 'vulnerable adults' are mentioned all four are usually intended.

#### **STATEMENT OF INTENT**

1. New Foundations Community Chaplaincy (NFCC) aims to help those who have been subject to criminal justice to move forward to crime free lives. This client group would be considered vulnerable. Although not routinely expected, we allow for the possibility that in our work we may come into contact with client family members and children.

2. Recognising that we work in a sector where we come into regular contact with vulnerable adults and may from time to time come into contact with children, NFCC is concerned to ensure that all its clients and their families remain safe and free from harm as far as it is within our ability to do so. NFCC is committed to playing a full and active part in the multi-agency response to child and vulnerable adult protection concerns. Through its Safeguarding Policy, NFCC will promote the well-being of vulnerable adults and children and thus promote enjoyment and protection of their health, safety and general welfare, particularly but not exclusively while in the company or care of staff or volunteers.

3. Staff, volunteers and clients can at times be vulnerable. The primary focus of this safeguarding policy is on those among our clients who would be classified as 'vulnerable'. Nevertheless, it should be seen as applying to good conduct of relationships within the whole of the charity.

#### **SUMMARY OF NFCC SAFEGUARDING POLICY**

4. NFCC will: -

- Fully recognise its responsibilities for safeguarding children and adults at risk.
- Respect and promote the rights, wishes and feelings of children and adults at risk.

- Promote and implement appropriate procedures to safeguard the well-being of children and adults at risk and protect them from abuse.
- Recruit, train, support and supervise its volunteers to adopt best practice to safeguard and protect children and adults at risk from abuse and to minimise risk to themselves.
- Require volunteers to adopt and abide by this Safeguarding Policy for Children and Adults at risk and these Procedures.
- Respond to all allegations of misconduct or abuse of children and/or adults at risk in line with this Policy and these Procedures.
- Liaise with statutory and all other appropriate agencies.

5. It is possible that through the normal working practices of NFCC, volunteers may work with or come into contact with adults, and possibly children, who may be deemed as vulnerable or at risk. In such instances NFCC will uphold its duty to offer assistance and raise concerns with the appropriate safeguarding authority.

6. NFCC Policy and Procedures are based on the following principles:-

- The welfare of adults and children at risk is of paramount concern.
- All adults and children at risk, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to safeguarding from abuse.
- It is everyone's responsibility to report any concerns about abuse and the responsibility of the statutory authorities (e.g. Adult Care Trust, Children's Social Services and the Police) to conduct, where appropriate a safeguarding investigation.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Safeguarding Act 1998.

## **INTRODUCTION**

7. In promoting this policy NFCC will take reasonable steps to:-

- Provide a welcoming, secure and comfortable environment for the benefit of vulnerable individuals;
- Keep them safe from harm while in the care of its staff or volunteers;
- Comply with relevant statutory requirements;
- Support and protect the interests of staff and volunteers who have contact with, or access to, clients, children, young people and others who may be considered vulnerable.

This policy is intended as a practical guide for staff and volunteers involved with vulnerable people.



## **SCOPE OF THE POLICY AND THOSE AFFECTED**

8. This policy applies to all staff and volunteers (including Management Team / Trustees) and others representing NFCC who have contact with vulnerable people.

## **DEFINITIONS**

9. In law a child is anyone under the age of 18. However, older children, for example, teenagers, may prefer to be called young people.

10. A vulnerable person is anyone with special needs who may need extra support, such as someone with a physical or learning disability, mental health problem, frailty due to old age, recovering from addiction, or disempowerment due to illness. See Appendix 1 for a fuller definition, as set out within the Safeguarding Vulnerable Groups Act 2006.

11. NFCC recognises the following: -

- people with special needs are able to cope in many situations, so sensitivity and common sense should be exercised.
- it may not necessarily be obvious that an individual is vulnerable.

## **IMPLEMENTATION OF THE POLICY**

12. The main contact between NFCC and vulnerable people would be via its staff and volunteer mentors. NFCC thus recognises the essential importance of thorough checks in the recruitment of staff and volunteers.

### **Recruitment and selection of staff and volunteers**

13. NFCC will consistently apply fair and objective methods of selecting employees, volunteers and contractors. A thorough selection procedure for positions, both paid and unpaid, which could involve unsupervised access to any vulnerable groups is probably the most effective way of assessing a person's suitability, and may act as a deterrent to those with an increased potential to mistreat others. When recruiting: -

- The need for any role will be properly evaluated.
- Equal Opportunities will apply. This is clarified in the NFCC Equal Opportunities Policy and how it relates to the NFCC Statement of Faith.
- Potential candidates will be invited to apply by completing an application form.
- Project Manager will interview each applicant by phone to assess applicant's relevance to the role. This is to allow applicants and NFCC staff to assess whether or not the applicant has the requisite skills, attributes and potential, to fulfil the job's requirements. People who are not accepted for training are entitled to feedback from the Project Manager.
- A final assessment will take place after the applicant has attended a Mentor Training course.

- A probationary period will be agreed that is acceptable to both applicant and NFCC. As a guideline, it is expected that this would normally be 6 months.

## References and screening

14. NFCC will ask for two written references, which cannot be from a relative, partner or spouse of the potential volunteer. One of these will normally be from someone who has experience of the applicant in a professional capacity, such as a current or recent employer.

15. Applicants will be required to undergo a DBS check. For all staff and volunteers whose role will bring them into contact with children, young people and/or vulnerable adults, an enhanced DBS check will be required.

16. The Disclosure and Barring Service offers organisations a means to check the background of volunteers to ensure that they do not have a history that would make them unsuitable for the post. Further information about Disclosure can be found at the website <https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

## Training and induction

17. NFCC seeks to ensure that its volunteers are suitably trained and that their voluntary tasking matches their experience. NFCC will deliver an ongoing programme of appropriate training to staff and volunteers within a framework of continuous learning and improvement. All staff and volunteers will receive induction training that provides an overview of the organisation, its purpose, values services and structure. This will include Safeguarding training at a level appropriate to their role. To support this policy and good practice within the organisation:

- Volunteer Mentors** are required to undertake Safeguarding training at a minimum of Level 2 (Raising Safeguarding Concerns).
- Those with Supervisory roles** are required to undertake Safeguarding training at a minimum of Level 3 (Practitioner)
- The Designated Safeguarding Officer / Deputy Safeguarding Officer** are required to undertake Advanced Safeguarding Training for Designated Safeguarding Leads.
- In addition, staff and volunteer refresher training in Safeguarding should be undertaken every two years.

18. For the most part, and wherever practicable, safeguarding training will be sourced externally, however, in the event that Safeguarding training is delivered in-house, trainers will be suitably qualified.

## **Identifying abuse**

19. Abuse is behaviour towards a person that either deliberately or unknowingly causes harm or endangers their life, general welfare or their human or civil rights. It can be passive, eg. failing to take action to care for someone, or failing to raise the alert about abuse; or active, eg. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated. Children, young people and vulnerable people are clearly at greater risk of abuse since they are less able to protect themselves against it. Abuse will usually fall within one or more of the following categories (detailed definitions of abuse can be found at Appendix 2):

- Physical
- Psychological and Emotional
- Sexual
- Domestic Violence
- Neglect and acts of omission
- Financial/Material Abuse
- Institutional/Organisational Abuse
- Discriminatory Abuse
- Modern Slavery
- Significant Harm
- Issues of Spirituality
- Self-Neglect

20. Common sense judgment should be relied upon to recognise the warning signs. However, it is essential to rely on facts rather than opinions and not jump to conclusions.

## **General behaviour**

21. In welcoming and working with people who are vulnerable NFCC will:

- Provide a friendly welcome for them and promote their general welfare, which must always be paramount.
- Recognise their rights as individuals and treat them with dignity and respect.
- Plan activities involving vulnerable people with care to minimise risks to their health and safety.

22. Staff and volunteers should:

- Remember they are role models and provide an example to follow for those they work with
- Bear in mind that some actions, no matter how well-intentioned, could be easily misinterpreted
- Be alert to any potential harm or inappropriate behaviour, particularly towards people who are vulnerable

- Respect individuals' rights to privacy
- Provide opportunity for vulnerable people to discuss any concerns they may have
- Speak to the NFCC Project Manager or Safeguarding officer if they have concerns about an individual's safety, or believe that a child, young person or vulnerable person may be at risk of harm.

23. Employees and volunteers should not:

- Arrange to see vulnerable people in circumstances unconnected with their work
- Be unnecessarily left alone for substantial periods of time with anyone who is vulnerable. Where one-to-one work is necessary, they should inform another responsible individual where they are going, with whom and for how long
- Permit, or in any way accept as normal, abusive behaviour by others or engage in it themselves
- Show favouritism to or become too closely associated with an individual. Nor should they get drawn into inappropriate attention-seeking behaviour (eg. crushes)
- Allow or engage in suggestive remarks, gestures, exchange of images or touching of a kind which could be misunderstood, even when such behaviour is meant to be amusing or taken in jest
- Promise to keep secrets
- Jump to conclusions about others without checking facts
- Do anything which might undermine the charity's good reputation for providing a safe environment
- Hesitate to share concerns on any of these matters with the appropriate representative.

## **PROCEDURE FOR RESPONDING TO ALLEGED OR SUSPECTED HARM**

24. In the event of alleged or suspected harm, the NFCC employee or volunteer is required to utilise the 'Incident Report Pack' which includes detailed guidance on responding appropriately and instructions on correctly filling in the report form.

25. If a person who may be vulnerable has talked about harm, or harm is suspected, or where there is significant concern that a child or vulnerable adult may be abused, NFCC employees or volunteers are expected to adhere to the following guidance:-

### **Receive**

- Listen to what is said calmly
- Accept what you are told and acknowledge the information received. You do not need to decide whether or not it is true
- Do not display shock or disbelief
- Be aware that the individual may have been threatened not to disclose information and may be nervous

## Reassure

- Comfort and offer support and encouragement to the client
- Do not promise confidentiality
- Acknowledge their courage in disclosing
- Reassure them they are right to talk about it and what they say is accepted
- Remind them they are not to blame – avoid criticising the alleged perpetrator or expressing a view on the specifics of the situation
- Do not promise that “everything will be alright now” (it might not be)

## Respond

- Respond but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- Explain what you will do next, i.e. inform the Designated Safeguarding Officer

## Record

- Make notes as soon as possible – during the interview if you can include: time, date, place, the client’s own words. Do not assume, but do ask, e.g. *“Please tell me what xxxxx means”*.
- Describe observable behaviour and appearance
- Cross out mistakes in original handwritten notes – do not use correction fluid
- Do not destroy your original notes – they may be needed later on and must be given to the NFCC Safeguarding Officer.
- Full and accurate notes (i.e. **word for word**) must be written as soon as possible, using the pro forma in the Incident Report Pack. Records should be as accurate as possible as they may be invaluable to the investigation and possibly used as evidence in court.

## Notify

- Contact the Designated Safeguarding Officer or the Deputy, giving them the completed pro forma/written information.

## Support

- Consider what support is needed for the individual – you may need to give them additional time or they may need to be referred
- Ensure you are supported - such interviews can be extremely stressful and time consuming.
- Once reported to them, the NFCC Safeguarding Officer will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.
- Any employee or volunteer who is involved in a disclosure of any kind may feel that they need to speak to a child care professional to reassure themselves that they have done the right thing. The **NSPCC**

operates a 24-hour help line for anyone concerned about a child or young person. It is primarily for use by adults and can be used anonymously: **0808 800 5000**

26 NFCC workers would be advised that in the event of a safeguarding concern the following procedures should be followed: -

a. If there is imminent danger of loss of life or a serious emergency then the Emergency Services (**999**) should be contacted immediately.

b. For other safeguarding concerns the procedure is as follows: -

i) Contact to be made with the Designated Safeguarding Officer or Deputy Safeguarding officer.

If the safeguarding officers are not available and immediate advice is required then ii) and iii) below apply:-

ii) Contact to be made with NFCC's safeguarding support from specialist safeguarding charity (31:8) for advice: helpline 0303 003 1111 *or...*

iii) To report an issue or for advice contact MASH (Multi Agency Support Hub for Hampshire County Council) helpline: 0300 555 1386 (out of hours 0300 555 1373)

The NFCC worker would be required to contact a NFCC Safeguarding Officer as soon as possible to advise of any safeguarding actions taken.

(see also information at Appendix A at the end of this Safeguarding section)

27. Any information disclosed would be shared on a 'need to know' basis only and would only be discussed with the NFCC Safeguarding Officers or the Statutory Authorities (Listed on page 8 of this document under the headings of Internal Contacts and External Contacts).

28. Dealing with incidents of harm is difficult for any individual so employees and volunteers **should not:**

- Act alone;
- Start to investigate privately; or
- Make any assumptions about the persons involved.

29. Where it is suspected that an employee or volunteer may be involved in the abuse, employees and volunteers should let the Designated Safeguarding Lead know as soon as possible. The employee or volunteer in question should be immediately removed from access to vulnerable individuals, but be assured that no presumptions have been made and that the allegation will be fully investigated by the relevant authorities.

30. If gross misconduct is reasonably suspected, it may be appropriate to ask them not to attend the office or property at all while the matter is under investigation (suspended on full pay if an employee). Once the relevant authorities' enquiry has concluded, the line manager should decide what further action is appropriate in conjunction with other relevant policies.

31. When dealing with personal and emotive details of this nature, confidentiality must be maintained at all times since the allegations or suspicions may prove to be unfounded. Notes and records should be kept in a secure place and shared only with those who need to know about the incident or allegation (See Confidentiality Policy).

32. No assumptions of guilt should be made unless and until an actual conviction has been obtained in the proceedings. Impartial contact will be maintained by a nominated staff member during this process.

## APPENDIX A

### CONTACT INFORMATION

#### INTERNAL CONTACT DETAILS:

Designated Safeguarding Officer:

Malcolm Knightley (NFCC) 07727 291641  
malcolm@newfoundations.cc

Designated Deputy DSO: Roger Vann (NFCC) 07961 103688

roger@newfoundations.cc

#### EXTERNAL CONTACT DETAILS

For advice: NFCC's Safeguarding specialist support charity (31:8)  
helpline: 0303 003 1111

To report Safeguarding concerns:-

Hampshire County Council (MASH - Multi Agency Safeguarding Hub):-  
0300 555 1386 (out of hours 0300 555 1373)

**Suspected Imminent Danger: 999** (101 if less urgent)



## APPENDIX B

### DEFINITIONS AND GLOSSARY OF TERMS

<b>1</b>	<b>A person is a vulnerable adult if he has attained the age of 18 and:</b>
a	he/she is in residential accommodation,
b	he/she is in sheltered housing,
c	he/she receives domiciliary care,
d	he/she receives any form of health care,
e	he/she is detained in lawful custody,
f	he/she is by virtue of an order of a court under supervision by a person exercising functions for the purposes of Part 1 of the Criminal Justice and Court Services Act 2000 (c. 43),
g	he/she receives a welfare service of a prescribed description,
h	he/she receives any service or participates in any activity provided specifically for persons who fall within subsection (9),
i	payments are made to him (or to another on his behalf) in pursuance of arrangements under section 57 of the Health and Social Care Act 2001 (c. 15), or
j	he/she requires assistance in the conduct of his own affairs.
<b>2</b>	<b>Residential accommodation is accommodation provided for a person:</b>
a	in connection with any care or nursing he requires, or
b	who is or has been a pupil attending a residential special school.
<b>3</b>	<b>A residential special school is a school which provides residential accommodation for its pupils and which is:</b>
a	a special school within the meaning of section 337 of the Education Act 1996 (c. 56);
b	an independent school (within the meaning of section 463 of that Act) which is approved by the Secretary of State in accordance with section 347 of that Act;
c	an independent school (within the meaning of section 463 of that Act) not falling within paragraph (a) or (b) which, with the consent of the Secretary of State given under section 347(5)(b) of that Act, provides places for children with special educational needs (within the meaning of section 312 of that Act);
d	an institution within the further education sector (within the meaning of section 91 of the Further and Higher Education Act 1992) which provides accommodation for children.
<b>4</b>	<b>Domiciliary care is care of any description or assistance falling within subsection (5) whether provided continuously or not which a person receives in a place where he is, for the time being, living.</b>
<b>5</b>	<b>Assistance falls within this subsection if it is (to any extent) provided to a person by reason of:</b>
a	his/her age;
b	his/her health;
c	any disability he/she has.
<b>6</b>	<b>Health care includes treatment, therapy or palliative care of any description.</b>
<b>7</b>	<b>A person is in lawful custody if he/she is:</b>
a	detained in a prison (within the meaning of the Prison Act 1952 (c. 52));
b	detained in a remand centre, young offender institution or secure training centre (as mentioned in section 43 of that Act);
c	detained in an attendance centre (within the meaning of section 53(1) of that Act);

	d	a detained person (within the meaning of Part 8 of the Immigration and Asylum Act 1999 (c. 33)) who is detained in a removal centre or short-term holding facility (within the meaning of that Part) or in pursuance of escort arrangements made under section 156 of that Act.
<b>8</b>		<b>A person falls within this subsection if:</b>
	a	he/she has particular needs because of his age;
	b	he/she has any form of disability;
	c	he/she has a physical or mental problem of such description as is prescribed;
	d	she is an expectant or nursing mother in receipt of residential accommodation pursuant to arrangements made under section 21(1)(aa) of the National Assistance Act 1948 or care pursuant to paragraph 1 of Schedule 8 to the National Health Service Act 1977 (c. 49);
	e	he/she is a person of a prescribed description not falling within paragraphs (a) to (d).
<b>9</b>		<b>A person requires assistance in the conduct of his/her own affairs if:</b>
	a	a lasting power of attorney is created in respect of him in accordance with section 9 of the Mental Capacity Act 2005 (c. 9) or an application is made under paragraph 4 of Schedule 1 to that Act for the registration of an instrument intended to create a lasting power of attorney in respect of him;
	b	an enduring power of attorney (within the meaning of Schedule 4 to that Act) in respect of him is registered in accordance with that Schedule or an application is made under that Schedule for the registration of an enduring power of attorney in respect of him;
	c	an order under section 16 of that Act has been made by the Court of Protection in relation to the making of decisions on his behalf, or such an order has been applied for;
	d	an independent mental capacity advocate is or is to be appointed in respect of him in pursuance of arrangements under section 35 of that Act;
	e	independent advocacy services (within the meaning of section 248 of the National Health Service Act 2006 (c. 41) or section 187 of the National Health Service (Wales) Act 2006 (c. 42)) are or are to be provided in respect of him;
	f	a representative is or is to be appointed to receive payments on his behalf in pursuance of regulations made under the Social Security Administration Act 1992 (c. 5).
<b>10</b>		<b>The Secretary of State may by order provide that a person specified in the order or of a description so specified who falls within subsection (1) is not to be treated as a vulnerable adult.</b>

## **APPENDIX C**

### **DEFINITIONS OF ABUSE**

#### **Physical Abuse**

Physical abuse is the physical ill treatment of an adult or child, which may or may not cause physical injury and causes harm to the individual's person. It may involve pushing, slapping, pinching, punching, hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating, force feeding, improper administration of medicines or denial of prescribed medicines, forced isolation and confinement, including a person being locked in a room or inappropriate sanctions or restraint, or inappropriate manual handling. It may be the result of a deliberate failure to prevent injury occurring.

#### **Psychological and Emotional Abuse**

Psychological abuse may involve the use of harassment, bullying, intimidation, indifference, hostility, rejection, threats, humiliation, name-calling, other degrading behaviours, shouting, swearing, discrimination or the use of oppressive language, mobile phone texting abuse, email, emotional abuse and all forms of Cyber abuse. It can result in feelings of low self-worth. Some level of psychological or emotional abuse is present in all forms of abuse.

#### **Sexual Abuse**

Sexual abuse involves an individual participating in, or watching, sexual activity to which they have not consented or were pressured into consenting, or to which they cannot give informed consent. It is not necessary for the individual to be aware that the activity is sexual. The activities may include: physical contact, including penetrative or non-penetrative acts, eg. rape, buggery, indecent assault or inappropriate touch, incest, and situations where the perpetrator touches the abused person's body (eg. breasts, buttocks, genital area); Non-contact activities, eg. exposing genitals to the abused person, or coercing the abused person into participating in or watching pornographic videos or photographs.

#### **Domestic Violence**

Including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

#### **Neglect and acts of omission**

Neglect is the deliberate withholding or unintentional failure to provide help or support, which is necessary for the individual to carry out activities of daily living. It also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk. Neglect may involve: failing to provide adequate food, shelter and clothing; failure to ensure access to appropriate medical care or treatment; neglect of basic emotional needs

#### **Financial/Material Abuse**

Financial/Material Abuse is the exploitation, inappropriate use or misappropriation of a person's financial resources or property. It occurs when the individual is deprived of their own financial assets, for example, by holding money back from the individual,

obtaining money by deception, or stealing money. It includes the withholding of money or the improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs.

### **Institutional/Organisational Abuse**

Institutional abuse can be defined as abuse or mistreatment by a regime as well as by individuals within any building where care is provided. Examples include lack of flexibility and choice, lack of consultation, public discussion of personal matters, inadequate or delayed responses, staff overly controlling service users' relationships and activities.

### **Discriminatory Abuse**

Repeated, ongoing or widespread discrimination on the grounds of age, race, disability, religion, sexual preference or gender, slurs, harassment, name-calling, breaches in civil liberties, unequal access to health or social care.

### **Modern Slavery**

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

### **Significant Harm**

Sometimes, a single traumatic event may constitute significant harm, e.g. violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the individual's physical and psychological development.

### **Issues of Spirituality**

Within faith communities harm may be caused to vulnerable adults by the inappropriate use of religious belief or practice. This can include:

- The misuse of the authority of leadership or potential discipline
- Oppressive teaching
- Obstructive healing and deliverance ministries
- The denial of the rights to faith and religious practice

Any concerns in relation to these matters should be dealt with via the procedures outlined in guidance in this policy.

Spiritual growth and well-being among vulnerable adults can be enhanced by:

- Making reasonable arrangements for them to attend acts of worship
- Providing for dietary, dress and other requirements of faith
- Enabling adequate and reasonable access to them by representatives of their faith community
- Accepting the integrity of the person's religious belief and spirituality

**Self-Neglect**

This covers a wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

## **SECTION 4:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

### **INFORMATION SECURITY POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 3 years) (Feb 24)

**Amended:**

## **OVERVIEW**

### **Objectives**

1. New Foundations Community Chaplaincy (NFCC) needs to collect and use certain types of information about the Individuals who it comes into contact with in order to carry out its work. This personal information must be collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material. Safeguards ensure compliance with the 1998 Data Protection Act and the General Data Protection Regulation (GDPR) (EU) 2016/679.

### **Data Controller**

2. NFCC is the Data Controller under the Act, which means that it determines what purposes personal information held will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

### **Disclosure**

3. NFCC may share data with other agencies such as the local authority, funding bodies and other voluntary agencies. The Individual will be made aware of how and with whom their information will be shared. There are circumstances where the law allows NFCC to disclose data (including sensitive data) without the data subject's consent. These are:

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of an Individual or other person
- c) The Individual has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion

4. All data protection policy information contained in Sections 5 – 15 apply to NFCC clients, staff and volunteers.

5. NFCC regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. NFCC intends to ensure that personal information is treated lawfully and correctly. To this end, it will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998. Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent un-authorized or unlawful processing or accidental loss or destruction of, or damage to, personal information
- h) Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

6. NFCC recognises the additional duties it owes to comply with General Data Protection Regulation (GDPR) (EU) 2016/679. Specifically, it will:

- Secure and document the consent of Individuals prior to collecting any personal data.
- Ensure that individuals understand their rights with regard to the consent that they have given for us to hold and process their data;
- Make it clear that individuals can withdraw their consent for NFCC to hold and process data at any time;
- Not use the data for any purpose other than that for which informed consent is held, except in one of the circumstances outlined in the GDPR.
- Make the information we hold on an individual available to them upon request and correct inaccuracies in a timely manner.

7. NFCC will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
  - The right to be informed that processing is being undertaken
  - The right of access to one's personal information
  - The right to prevent processing in certain circumstances
  - The right to correct, rectify, block or erase information which is regarded as wrong information and
  - The right to erasure.
- Take appropriate technical and organisational security measures to safeguard personal Information.
- Ensure that personal information is not transferred abroad without suitable safeguards.
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
- Set out clear procedures for responding to requests for information.

8. Further information regarding disclosure, confidentiality, data management and procedures of NFCC can be found in the charity's Confidentiality Policy and Procedure. See Appendix A for NFCC data handling procedures.

9. For further information regarding GDPR see Appendix B – NFCC Privacy Notice.

## **DATA**

### **Date Collection**

10. Informed consent is when:

- An Individual clearly understands why their information is needed, who it will be shared with and the possible consequences of them agreeing or refusing the proposed use of the data.



- An Individual gives their consent predicated on the above

11. NFCC will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form. When collecting data, NFCC will ensure that the Individual:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the Individual decide not to give consent to processing
- c) Grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used.
- f) Understands that they have the right to withdraw consent at any time.

#### Data Storage

12. Information and records relating to service users will be stored securely and will only be accessible to authorised staff. (See Appendix A).

13. Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

14. It is NFCC's responsibility to ensure all personal and charity data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

#### Data Access and Accuracy

15. All Individuals have the right to access the information NFCC holds about them. NFCC will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes. In addition, NFCC will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do

- NFCC deals promptly and courteously with any enquiries about handling personal information
- NFCC describes clearly how it handles personal information
- NFCC regularly reviews and audits the way it holds, manages and uses personal information
- NFCC regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

16. This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998 or the General Data Protection Regulation (GDPR) (EU) 2016/679.

## **GLOSSARY OF TERMS**

### Definitions

**Data Controller** – The person who (either alone or with others) decides what personal information NFCC will hold and how it will be held or used.

**Data Protection Act 1998** – The UK legislation that provides a framework for responsible behaviour by those using personal information.

**Data Protection Officer** – The person(s) responsible for ensuring that NFCC follows its data protection policy and complies with the Data Protection Act 1998.

**Individual/Service User** – The person whose personal information is being held or processed by NFCC, for example, a client, an employee, or supporter.

**Explicit consent** – is a freely given, specific and informed agreement by an Individual/Service User in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

**Notification** – Notifying the Information Commissioner about the data processing activities of NFCC, as certain activities may be exempt from notification.

(This link to the ICO website provides a self-assessment guide which NFCC will use to decide whether there are exemptions from notification:

[http://www.ico.gov.uk/for\\_organisations/data\\_protection/the\\_guide/exemptions.aspx](http://www.ico.gov.uk/for_organisations/data_protection/the_guide/exemptions.aspx)

**Information Commissioner** – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

**Processing** – means collecting, amending, handling, storing or disclosing personal information.

**Personal Information** – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within NFCC.

**Sensitive data** – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings

## **APPENDIX A**

### **NFCC Data Handling Procedures / Record Keeping and Information Sharing**

Data providing risk assessment will be received from referral agency via SecureMail (cjsm) only and directed only to Project Manager.

Correspondence containing between Probation Officer / Accommodation Manager and NFCC volunteer containing Data will be handled by SecureMail (cjsm).

Any non-data email correspondence with the relevant agencies will refer to the Data Subject by first name or initials only

Data will be stored on a single PC device that:

- is running Bitlocker encryption
- is backed up to secure cloud storage on a daily basis
- is password (PIN) protected
- is only used by the Project Manager
- is behind an up-to-date Firewall
- is running up-to-date Anti-virus software
- is not synced (in terms of said Data) with a tablet or smartphone

Any printed version of said Data is managed only by Project Manager and stored in a locked room.

Email communication between Project Manager and the volunteer mentors involving any Data Subject will only refer to client by first name or initials and will otherwise be anonymised.

Email communication with HMPPS personnel regarding clients or those being referred for support which contains what is classified as 'Official' information will take place using CJSM SecureMail.

Volunteer mentors are given an account and authorised to access password-protected cloud-based Document Library and Case Management System (on Office365 SharePoint Online – ISO 27001 certified) to review all information related only to their specific Data Subject.

NFCC Data Privacy policy requires volunteer mentors to not have a hardcopy of Data Subject details in their possession or digital copy of the Data on any of their devices and to not share Data in any way with non-authorised individuals.

Meeting reports refer to Data Subject by first name or initials only. These digital reports are uploaded to Case Management system and the original digital file is stored in anonymised form on the volunteer's computer behind password / PIN protection.

Meeting Reports cannot be printed out and retained by the volunteer. Handwritten meeting notes must be anonymised.

Data Subject's first name and initial of last name along with phone number and email address can be stored in the volunteer's mobile phone Contacts behind PIN or face-recognition security.

## **APPENDIX B - PRIVACY Statement**

New Foundations Community Chaplaincy (NFCC), a registered charity (Number 1192181) and is committed to a policy of respecting and protecting the rights and privacy of all individuals.

This statement describes how NFCC collects and uses personal information about people who engage with our charity and/or visit our websites. The terms of this statement may change, so please check it from time to time. If you have any queries about this privacy statement, please contact the Information Co-ordinator at NFCC, Suite 604 – 5 Charter House, Lord Montgomery Way, Portsmouth PO1 2SN or email [info@newfoundations.cc](mailto:info@newfoundations.cc)

### **Contents**

1. General privacy information
2. Our legal basis for using your information
3. What information do we collect and how do we use it?
4. Sensitive personal data
5. Your rights
6. How you can access and update your information
7. Third party service providers
8. Security precautions
9. Retention of information
10. Cookies
11. Links to other websites
12. General
13. Changes to this Privacy Policy
14. Definitions and Interpretation

### **1. General privacy information**

NFCC is registered with the ICO (Information Commissioner's Office).

All personal data is collected and processed in accordance with UK legislation, including the Data Protection Act 1998, General Data Protection Regulations (GDPR 2018) and Privacy and Electronic Communication Regulations (PECR).

To help you understand how this legislation protects you, good information and advice is available on the Information Commissioners Office website.

### **2. Our legal basis for using your information**

We hold your personal data under the following lawful bases:

- Where you have consented to us using your personal information
- Where it is necessary for our legitimate interest - to best provide you with the service you have requested

We primarily collect data in relation to the relationship we have with individual clients. In the work that we do with our clients, and in the engagement we have with supporters and funders, NFCC gathers personal data; to enhance our service quality; help us to tailor our services for training and resource allocation; to understand our supporters better and also help us to fundraise more effectively.

We want every interaction people have with NFCC to be positive. In all areas of our work, we are committed to protecting your personal information, being open about what information we hold, ensuring that we only gather information as necessary and retaining it only for as long as we need to.

The policy applies to how NFCC collects and uses personal information you provide to us and that we collect, whether online, via phone, email, in letters or in any other correspondence or from third parties.

### **3. What information do we collect and how do we use it?**

NFCC collects information in the following ways:

**Information you give us:** When you sign up for a service, engage with our social media, fill in an expression of interest form, make a donation to us, register for an event or otherwise provide us with personal information. When you register, we'll ask for personal information, such as your name, email address and telephone number to store in our records.

**Information we get from your use of our website and digital services:** We collect information about the services you use and how you use them, like when you visit our website or view and interact with the content. This helps us to understand your interests in our work and to tailor our resources to be more focused on what supporters or clients need.

**Information from third parties:** We may receive information about you from third parties and from the public domain. This may include information such as your name, postal address, email address, phone number, your geographic location. We, like all charities and companies, are able to confirm what browser you are using, IP address and computer operating systems that are being used and this information may be used to improve the services we offer. We do not buy, sell or swap data with third parties or other charities.

### **4. Sensitive personal data**

Data Protection law and the GDPR recognises that certain categories of personal information are more sensitive. This is known as sensitive personal data and covers:

- Racial or ethnic origin;
- Political opinion;
- Religious or other beliefs;
- Trade union membership;

- Physical or mental health or condition;
- Sexual life;
- Criminal proceedings or convictions.

Our main use for sensitive personal data will be to provide the services that we are commissioned to deliver and we will always make it clear to our clients what sensitive personal data we are collecting, why we are collecting this data and what purposes we may use it for.

We may also collect sensitive personal data if you make the information public or if you tell us about your health and care experiences relating to the support we provide you (for example, if you agree to act as a case study for us or volunteer to share your story); however, again, we will always make it clear to you when we collect this information from you what the sensitive personal data we are collecting is, and what purposes we may use it for.

We will not collect sensitive personal data about non-clients unless there is a clear reason for doing so. For example, to enable everyone to participate in a fundraising initiative, we may need this information to ensure that we provide appropriate facilities or support to enable your participation.

## **5. Your rights**

We hold data to enable us to update people with news and information about:

- our charity and the vital projects we runs
- volunteering opportunities and how you can support NFCC
- appeals, fundraising and our fundraising events
- regular financial support or leaving a legacy

You have a choice about whether or not you wish to keep hearing from us. You can change your marketing preferences and you also have the choice to unsubscribe to any direct communication that we send you. This feature is included in mailings such as our newsletter and prayer pointers.

At any time you have the right to request and view your personal data held by NFCC. Your rights also include:

- The right to be informed
- The right of access
- The right to rectification
- The right to be forgotten (data erasure)
- The right to restrict processing
- The right to data portability
- The right to object



## **6. How you can access and update your information?**

The accuracy of your information is important to us and you have the right to ask for a copy of the information we hold about you and to have any inaccuracies in your information corrected.

Please contact us at NFCC, Suite 604 – 5 Charter House, Lord Montgomery Way or email [info@newfoundations.cc](mailto:info@newfoundations.cc), or telephone 07961 103699 if you would like to exercise any of the above rights.

## **7. Third party service providers**

We will not sell or rent your information, including web browsing activity (see our Cookie Policy) to third parties and will not share your information with third parties for marketing purposes.

In order to carry out some of the activities listed in ‘How do we use this information?’ we may share information with service providers, agents and associated organisations. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure.

When you are using our secure online donation pages, your donation is processed by a third party payment processor, who specialises in the secure online capture and processing of transactions.

We may also need to disclose your information if required by law (for example to government bodies and law enforcement agencies) or if we have your permission to do so.

Our websites may include links to websites run by other organisations. NFCC is not responsible for the privacy practices of these other websites so you should read their privacy policies carefully.

## **8. Security precautions**

Data security is of great importance to NFCC and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected via this website.

If password access is required for certain parts of the website, you are responsible for keeping this password confidential.

We endeavour to protect your personal data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your data transmitted to the website.

We will inform you if a breach occurs and that we consider your data exposure to be a risk to you and your rights.

## **9. Retention of information**

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We have a retention policy which lays down timescales for the retention of information. Customer data retention periods can be found below:

Supporter Dataset: Name and contact details may be retained for up to 12 months from last contact

Client Dataset: Name, contact details and other information (including sensitive data) relevant to the support of the client may be retained for up to seven years after last contact.

If you chose to send us information via email, we cannot guarantee the security of such information until it is delivered to us.

## **10. Cookies**

We may place and access certain Cookies on your computer. NFCC uses Cookies to improve your experience of using the Website. NFCC has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Our Website may place analytical/performance cookies, which allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You can choose to enable or disable Cookies in your internet browser and delete Cookies at any time.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help provided by your internet browser if you are unsure about adjusting privacy settings.

## **11. Links to other websites**

We may provide links to other websites from our own website. We have no control over such websites and are not responsible for the content of these websites. This Privacy Policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

## 12. General

You may not transfer any of your rights under this Privacy Policy to any other person. We may transfer our rights under this Privacy Policy where we reasonably believe your rights will not be affected. We may transfer your personal information to a third party as part of a sale of some or all of our business and assets. We would take steps to ensure your privacy rights continue to be protected.

## 13. Changes to this Privacy Policy

NFCC reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the website and you are deemed to have accepted the terms of the Privacy Policy on your first use of the website following the alterations.

You may contact NFCC by email at [info@newfoundations.cc](mailto:info@newfoundations.cc)

## 14. Definitions and Interpretation

In this Privacy Policy, the following definitions are used:

1. **Data:** collectively all personal information that you submit to NFCC. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998 and GDPR (2018).
2. **Cookies:** a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause above (Cookies);
3. **UK and EU Cookie Law:** the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
4. **User or you:** any third party that accesses the Website and is not either (i) employed by NFCC and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to NFCC and accessing the Website in connection with the provision of such services; and

**Website:** the Website that you are currently using, [www.newfoundations.cc](http://www.newfoundations.cc), and any sub-domains of this site unless expressly excluded by their own terms and conditions

## SECTION 5:

### NEW FOUNDATIONS COMMUNITY CHAPLAINCY

### CONFIDENTIALITY POLICY AND PROCEDURES

Date of issue: (12 Feb 21)

Date of Review: (+ 3 years)

Amended:

#### **POLICY STATEMENT**

New Foundations Community Chaplaincy (NFCC) is committed to practices and procedures that ensure confidentiality in respect of information relating to clients, volunteers and employees.

#### General

1. New Foundations Community Chaplaincy (NFCC) is ICO registered (Information Commissioner's Office); all operations are carried out under the GDPR 2018 guidelines.
2. NFCC operates in prison and community settings. Personal details relating to individual clients are acquired from a wide range of sources. Such information gathered about clients is subject to total confidentiality in all dealings with the general public.
3. All information given to staff and volunteers about clients is treated with the utmost care. Clients' personal files are kept in secure cabinets (or digitally secured – see Information Security policy – Appendix A.). Clients have right of access to manual and computerized files when project staff have been notified in writing. Exposure of clients to the media will be subject to strict provisos, from the client, in writing. Information will be given to a client's family and close relatives about the client's well-being and progress but **only** with the express permission of the individual concerned.
4. Personal information will be given to other professionals (for example: recovery key worker; prison officer; probation officer; social worker; clergy) on a need-to-know basis. This will be with the consent of the client, except in instances where NFCC staff have reason to believe that children are at risk or any individual is at risk of serious personal harm or that a crime has been committed. (See NFCC Mentor-Mentee Agreement form)

#### Prison Settings

5. Information regarding confidentiality will be given to, and discussed with, prisoners when they are assessed for acceptance as a client. The prisoner will be required to understand and accept that personal information will be discussed within the management team, with the relevant volunteer mentor and where appropriate with Offender Managers, Supervisors and prison staff. Information will be totally confidential within that context. The prisoner will be required to sign a Consent Form for this purpose. (See Appendix A and Appendix B)

### Community Settings

6. New Foundations Community Chaplaincy operates in community settings - often in partnership with other organisations. The general principles above will apply. In addition however staff and volunteers working in these areas will be subject to the confidentiality policies of that particular organisation. Aspects of confidentiality will be explained to clients as part of the assessment process. (See Appendix B)

7. Confidentiality is an important issue. NFCC staff and volunteers will try to maintain a balance between encouraging openness, avoiding unnecessary secrecy and bureaucracy, and ensuring that privacy is respected. NFCC carries out all functions in accordance with the Data Protection Act 1998.

8. Information will be accurate, up to date and accessible only to personnel who need it in the course of their work. All staff should operate a policy of confidentiality within the organisation. All other personnel will have access to information only on a genuine need-to-know basis. Staff and volunteers are not covered within the Data Protection Act to use personally owned computers to record or store information of clients or charity personnel.

9. NFCC will allow clients reasonable access to information held by the organisation and to correct any inaccuracies in it. An individual may have access to information held on their personal file by making a verbal request to the relevant member of staff. Access should be arranged within 5 working days. This notice is required as it may be necessary to check with third parties as to whether certain information can be shared. An individual may not remove information, but permission may be given by the Project Manager to photocopy items.

10. Information will be withheld from an individual only for a specific reason. This may include information about or from a third party, or information that is subject to legal privilege. Personal files may hold simply noted client responses to questions, factual records or detailed assessments – see paragraph 13. The opportunity for a client to see, comment on and correct information helps to ensure that the information is complete, accurate, clear and unbiased. However, where there is a genuine risk of harm to a third party, access may be refused.

11. Disclosure to other persons, agencies or contractors will be made only with the informed consent of the person to whom the information relates. If the health, safety, security or welfare of clients or others may be seriously compromised, the

NFCC has a moral duty to act appropriately on any information in its possession. Disclosure without consent will be made only after careful and thorough consideration by the management team. Personnel will not knowingly provide false information to the police, DSS, housing benefits office, local authority or any other agency.

12. Any complaint about the operation of this policy should be made through the NFCC Complaints Procedure. A full copy of the confidentiality document including procedures is available from the organisation in accordance with the Data Protection Act 2018 & Access to Personal Records Act 1989.

## **PROCEDURES - REGARDING CLIENTS**

### Personal files

13. Personal files are kept on individual people. The following information may be kept on file, where relevant:

- Application forms completed by applicant.
- Referral letter/supporting information from agency.
- Notes of interviews/visits/telephone calls/correspondence.
- Copy of agreements and consent forms with clients' signature.
- Medical information in appropriate cases.
- Care plan/sentence plan/resettlement plan.
- Risk assessment information.
- Correspondence/interviews/meetings/incidents/complaints/support needs.
- Correspondence/reports from other agencies.

Personnel must be aware of the specific purpose for which they are collecting personal information.

### Purpose of holding information

14. Information on clients' files is held for one or more of the following purposes:

- To assess applicant's suitability for a service in accordance with the selection and allocation criteria.
- For the provision of appropriate support to clients, where required, and development of programmes.
- For the provision of continuing planned care.

- For responding appropriately to accidents and emergencies and for seeking to ensure the health, safety and well-being of other clients.

#### Access to personal files by a client

15. Clients have the right to see their personal file and correct any inaccuracies in it. Information can only be withheld from an individual for a specific reason (see below). Appointments for viewing a file should be made as soon after the request as possible. If consent of a third party is needed before a particular piece of information can be disclosed, this should not delay access to the rest of the file.

16. The individual or their authorised representative must provide identification (visual recognition will be sufficient in most cases). If possible, a table, chair and degree of privacy should be provided. An appropriate person should be available to explain anything, give assistance or discuss the contents, where this is appropriate.

17. Where possible, photocopying facilities should be made available if the individual wishes to copy the documents.

### **MANAGEMENT OF INFORMATION**

18. For specific details on NFCC practices regarding Data handling, record keeping and information sharing, please refer to NFCC Data Protection Policy, at Section 4 Appendix A)

#### Keeping up to date

19. Where information is no longer relevant, it may be removed from the file in agreement with the client and the Project Manager and disposed of by shredding.

20. Other information should be kept up to date, as necessary, and any inaccuracies corrected as soon as identified.

21. Individual client files are kept securely in online storage only.

22. Confidential printed material must be disposed of by shredding.

#### Keeping information confidential

23. All volunteer personal files and other confidential information must be kept in a secure area or locked storage, except when actually in use. This includes any information, which would not normally be public knowledge.

24. Keys to filing cabinets and offices, etc., must only be held by personnel who need regular access to them.

#### Access to information

25. As a general principle, personnel should only have access to personal files or other confidential information when they need information in the course of their duties.

26. In practice, only management staff will generally have access to personal files as required. Administrative personnel will have such access as is required by their work.

27. Care personnel/project workers/volunteers will have access on a 'need-to-know' basis.

28. Ancillary personnel will not have access to personal files and will only be provided with information about clients where it is relevant to their work.

29. In all cases, care should be taken not to pass to anyone sensitive information that may cause embarrassment to clients.

#### Information that can be withheld

30. Information should only be withheld for one or more of the reasons set out below, and never because a staff member or volunteer does not want someone to read what has been written. Although some information may be very sensitive and unpleasant, the knowledge that such information exists and that the person concerned is denied access to it can be equally or more upsetting.

31. If any documents are to be withheld, a note of such items must be recorded on the file and made known to them. The Project Manager should take the opportunity to reassess the need to keep such information on file. If it is not relevant, it should be destroyed or returned to the author.

32. Only the following reasons should be considered as valid for withholding information from someone wanting to see their personal files:

- a. Information that relates to or identifies a third party, unless they have given their consent for it to be disclosed to the person concerned. This includes other members of a family. Although in normal circumstances information would be shared within a family, there are exceptional cases where a member of a family expressly wishes information to be withheld from other members of the family. This wish should be respected. This includes information provided by a child. In all cases staff should take decisions on the merits of the case.
- b. Information provided by an outside agency on the understanding that it will not be disclosed to the person it concerns. This sort of information should only be kept if it is really relevant in providing a service to that individual, otherwise it should be destroyed or returned to the author. NFCC should always make clear that the policy of sharing personal information with the



person it concerns is considered necessary for the best possible services to be provided. Outside agencies should also be encouraged to adopt a similar desire for openness and to allow their contribution to be disclosed to the person concerned.

- c. Information that would cause physical or mental harm to another person, if it is disclosed to the individual.
- d. Information that is the subject of legal professional privilege or statutory requirement or is likely to lead to legal proceedings being taken against the individual.
- e. Information where, in the opinion of a medical practitioner, immediate disclosure would be likely to expose the individual to the risk of serious physical or mental harm. Individual work with a person should aim to help them come to terms with the facts, and special counselling should be offered to prepare the individual for the disclosure of such information, which, if released, could prejudice the interests of NFCC.

#### Disclosure of information to third parties.

33. NFCC will make personal information available where required to do so by a court of statutory obligation, including information such as medical details, rent arrears, domestic violence, child abuse, criminal behaviour and harassment, etc.

34. Otherwise, no third party outside NFCC shall have access to personal information without the consent of the individual.

35. If any personal information is passed onto a third party outside of NFCC, the fact will be recorded on the clients' personal file, together with details of information that has been shared. This will be disclosed to the individual concerned.

36. In connection with the purposes defined above, NFCC will need to pass on certain personal information to third parties. The guidelines refer to certain common situations, which will be explained to clients at the outset and this consent obtained at the time. Criteria used for deciding what information needs to be shared with third parties is found in the NFCC Safeguarding Policy.

37. Consent should be informed consent and, where appropriate, in writing.

#### Publicity

38. Clients will be made aware of the Confidentiality Policy and what it means for them and for others when they are offered a service from NFCC. (See Appendix A and Appendix B). External agencies, particularly referring agencies, will also be made aware of the policy.

#### Breaches of the Confidentiality Policy

39. NFCC will view very seriously any breach of its Confidentiality Policy. Breaches by personnel will result in disciplinary action being taken in accordance with the organisation's Complaints & Grievance procedures.

### Complaints

40. Complaints by clients concerning any aspect of the operation of these policies and procedures e.g. breach of confidentiality, access to files, inaccurate or irrelevant information should be made through the organisation's Complaints Procedure.

### Training

41. Training will be provided for personnel in order to ensure that they understand the policy, procedures and guidelines set out here. They will be made aware of the need and reasons for maintaining confidentiality and the potential consequences of breaches of confidentiality for clients and for themselves.

42. The Confidentiality Policy will be introduced to personnel as part of the induction process.

### Management Committee Information

43. At meetings of the Trustees, or in mailings, clients will be referred to by a first name (coded where necessary) or initials only so that the identity of the individual is not revealed. No more personal details than are necessary will be discussed. Members of the Trustees recognise that meetings and mailings are regarded as confidential.

## **GUIDELINES**

### Legal obligations

44. NFCC seeks to comply with the data protection principles, for any personal data held on computer.

45. NFCC may be obliged to give information to:

- Social Services authorities
- Police
- Police Commissioner
- Government departments Local authorities

### Telephone calls

46. When other agencies telephone requesting information on clients, personnel will take the caller's name, status and telephone number. If appropriate, a response will be delayed until the caller is verified, in accordance with our procedures, the response has been thought out, and permission to pass on information has been obtained from the clients.

47. Returning the call (thereby justifying the number), if the organisation is known, and the caller is bona fide, information may be provided. Non-confidential information may be passed to outside agencies seeking details of former clients. All such telephone conversations should be accorded appropriate privacy and should be recorded in writing and noted according to established procedures.

#### Recording of information

48. Where records are kept, it is important that they are kept properly:
- a) using the person's full name,
  - b) they are factual and accurate,
  - c) legible and dated, signed or initialled as appropriate,
  - d) secured in a lockable filing cabinet or lockable storage place,
  - e) if on computer there is an agreed limited access arrangement,
  - f) Feelings, assumptions and interpretations, if used, should be owned by the author.
  - g) Standard forms should be used where appropriate

#### Confidential discussions

49. Personnel must ensure confidentiality when they are discussing clients amongst themselves or with other agencies, either in person, on the telephone or any form of recording or reporting. The following precautions should be taken:

- a) Ensure privacy.
- b) Cease the conversation if someone, who should not have that information, comes into the room.
- c) If a phone call is received, ask the clients, personnel or visitor to leave the room or arrange to phone back.
- d) Replace information to its secure place when it is finished with.
- e) Ensure derogatory comments are not used about anyone, anywhere.
- f) Ensure day books or files are never left lying open or around.
- g) Ensure that all handwritten notes and/or letters, which are subsequently typed and filed, are destroyed.
- h) Ensure that personal facts about one client are not discussed with another client.

#### Other clients asking for information

50. It should be made clear in such a situation that a staff member or volunteer is bound by the Confidentiality Policy.

#### Other personnel asking for information

51. It should be explained to personnel who do not normally have access to personal information that they are bound by the Confidentiality Policy, and that information should only be given where it is relevant to the person's job.

#### Clients speaking confidentially to one member of staff or a volunteer

52. When a client wishes to tell a member of staff or volunteer sensitive, contentious or personal information, it should be made clear that the personnel work as a team and that it is therefore NFCC's policy that such information be shared with appropriate personnel in the project. Precautions will be taken in accordance with paragraph 4, above.

#### Record Keeping and computer data, etc.

53. The principles outlined above in regard to record keeping, access, security and storage apply to these documents as well as to clients' individual files.

#### Monitoring information

54. Procedures will be actively followed which protect individual identification.

#### Unsolicited and anonymous information

55. Unsolicited information will be considered and if not required by NFCC will be disregarded, returned or destroyed.

#### Information to the DSS, Housing Benefit, Local Authority or CAB

56. NFCC will provide information to any of the above in order to assist clients in expediting legitimate claims for benefit to which they are legally entitled. Clients will be informed about any information passed on.

57. When requests for information are received from DSS or the local authority, it is good practice to agree to ring back with details. Where there is uncertainty as to whether information may be passed on, the NFCC Project Manager should be consulted first.

58. Where there is a persistent request for information, which appears to be unrelated to a claim, the DSS or local authority should be asked to put the request in writing.

59. Where personnel are requested to confirm information on a client's claim that is known to be incorrect, personnel will provide the correct information.

#### Police inquiries

60. Where police are investigating a criminal matter and are requesting assistance, information that is not of a sensitive or personal nature may be provided, e.g. whether a client is receiving a service.

61. For more sensitive and personal information, personnel should refer the matter to the Project Manager

#### Passing on information to other agencies

62. Personal information must never be passed onto another agency without the client's consent, e.g. where the client has AIDS or is HIV+, has Hepatitis C.

63. When NFCC is referring a client to another agency for assistance, e.g. with housing or for a particular help or support, the client's consent must be sought before passing on personal information. Personnel must explain to the client how the information provided will be used by the referring agency, and the potential benefits to them of providing such information.

64. In exceptional circumstances, where the health and safety of the individual or of other individuals is at risk and it is not feasible to obtain the individual's consent, information that would normally be considered confidential may be passed onto appropriate agencies, e.g. relevant medical information to medical personnel where an individual is unconscious.

#### **ACCESS TO RECORDS** (For former clients)

65. Former clients must make their request in writing and also provide identification. On receiving a request from a former service user (or relative) for access to a personal file, the member of staff needs to retrieve the file from the archives, with the knowledge of the Project Manager, and carefully sort the relevant information that can be accessed by the former service user.

66. Information will only be withheld from an individual for a specific reason. This may include information: about another person, written by a third party, which is subject to legal privilege. (See para 29-31)

67. A suitable venue and time should be made for the former client to access the file and if s/he wishes to make photocopies of the information it is acceptable as long as it meets with the requirements already stated.

68. Disclosure to relatives or other persons will only be made when the following is available:

- identification of the person making the request.
- evidence is produced justifying the reason for the request.
- authorisation for them to have the information.

69. At all times staff should show sensitivity and support to the former service user when accessing information from the past.

## APPENDIX A

### Disclosure Consent

The following is to be included on the Request for Mentoring Support form complete by a prospective NFCC client:

**\* DISCLOSURE CONSENT \***

**I confirm that, to my knowledge, the information I have provided above is correct.**

**I further agree that:**

- **The following privacy policy covers the information use, sharing and disclosure of the data contained in this Referral Request - <http://bit.ly/privacy-nfcc>**
- **New Foundations Community Chaplaincy can hold this data securely for the duration of my engagement with them and that the data will only be seen by the staff and volunteer(s) involved in my support;**
- **New Foundations can be in contact with my chaplain, resettlement or accommodation manager, and my probation officer in order to decide how to best support me;**
- **My chaplain, resettlement or accommodation manager and my probation officer can disclose to NFCC any information they consider necessary to complete the risk assessment or that requested for making mentoring support decisions;**
- **The completed risk assessment can be forwarded to New Foundations as a digital file to be kept under password protection.**

Signature \_\_\_\_\_

Printed name \_\_\_\_\_

Dated: \_\_\_\_\_

## APPENDIX B

The following Consent form is used once an NFCC client is in the community or if adequate contact is made with the individual prior to release.

### CONSENT Sharing & storage of information

New Foundations Community Chaplaincy (i.e. staff and volunteers) needs to keep limited Information about you and the support you are receiving, and to share information with other people and organisations. It is important that you understand what information we are storing and sharing with others, and that you understand your rights under data protection legislation.

#### Confidentiality

Discussions with New Foundations Community Chaplaincy (NFCC) are confidential EXCEPT when:

- The safety and security of the prison and those within it is at risk
- Your NFCC team believes you may be at risk of self-harm; or
- Your NFCC team has concerns about the welfare or safety of any children or vulnerable adults who may be in your care; or
- The safety and wellbeing of someone else or their property is at risk

#### Sharing information

We need to share and receive information about you and your circumstances with other agencies, including the ones listed below. Please tick to indicate your agreement.

IN PRISON	√	IN THE COMMUNITY	√
Prison Staff		Benefits Agency/Job Centre Plus	
Your Offender Supervisor (OMU)		Offender Manager (Probation Officer)	
Course Supervisors (AA, CARATS, SDC etc.)		Addiction Support (AA, NA, EDP etc.)	
Healthcare Staff		GP, Mental Health Services/Other Healthcare Professionals	
Resettlement Team		Solicitors and Barristers	
Chaplains		Faith Community Leaders (where appropriate)	
		Family	



		Accommodation Providers	
		Social Worker/Social Services	
		Other (please specify)	

**Storing information**

Like similar community chaplaincy charities, NFCC has a computer database of all the people we support. We will record information about you and your circumstances, and also details about the conversations you have with us, and any support we offer you. We record all this information because it helps us to support you better.

We will also use this information to improve the way we work. We will use data about you and other people to analyse how we work and report about what we do, but we will never use data that can identify you personally. The data will not be passed to anyone else (third parties), except in an anonymised form. You have the right to ask to see the information we are keeping about you at any time, and also to ask for your information to be deleted. If you have any questions about the information we hold about you, please contact the NFCC Project Manager.

I CONFIRM that the NFCC representative has discussed confidentiality with me and the limits to that confidentiality. I understand the reasons why certain information I give may be shared with other people and I understand that communication between staff and outside agencies is intended to support me.

I CONFIRM that I would like to work with the NFCC mentoring project. I UNDERSTAND that being assisted by NFCC is voluntary and I can withdraw at any time without giving a reason and without my legal rights or support from other agencies being affected in any way.

I CONSENT to information being shared with other people/agencies and to the storage of information, including electronically on the New Foundations database.

SIGNATURE \_\_\_\_\_

NAME \_\_\_\_\_

DATE \_\_\_\_\_

## **SECTION 6:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

#### **HEALTH AND SAFETY POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 26)

**Amended:**

#### **Introduction**

1. This is the Health and Safety Policy of New Foundations Community Chaplaincy (NFCC). This policy applies to all NFCC employees, contractors/consultants, agency workers, volunteers and visitors to NFCC and those affected by our work activities.
2. The Trustees and Project Manager are committed to providing a safe and healthy environment for all staff, volunteers and all those affected by our work activities.

#### **Statement**

3. Our statement of general policy is to:
  - provide adequate control of the Health and Safety risks arising from our activities.
  - consult with our staff and volunteers on matters affecting their Health and Safety.
  - Where equipment is provided, it will be properly maintained.
  - ensure safe handling and use of substances.
  - provide information, instruction and supervision for staff and volunteers.
  - ensure all staff and volunteers are competent to fulfil their tasks, and to give them adequate training.
  - prevent accidents and cases of ill health related to NFCC's operations.
  - maintain safe and healthy working conditions.
  - review and revise this policy as necessary at regular intervals.

#### **Responsibilities**

4. The trustees of NFCC have overall responsibility for Health and Safety. One trustee will be nominated to have specific responsibility for oversight of Health and

Safety issues.

5. Responsibility for day-to-day tasks is delegated to the NFCC Project Manager. Specific tasks are delegated to individuals within the organisation, by region or by topic. Responsibilities are clearly set so that if there are any Health and Safety concerns, they can be reported to the right person.

6. Staff and volunteers also have legal responsibilities to take care of the Health and Safety of themselves and others, and to co-operate with NFCC to help them comply with the law. In particular, all staff and volunteers must:

- 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 their regional coordinator or to the Project Manager.

#### Risks Arising from NFCC Activities

7. The NFCC Risk Assessment process will incorporate Health and Safety issues for all staff and volunteers engaged in activities for NFCC, including home and remote working. All employees are required to manage and control risks appropriately, given appropriate training, in line with the Risk Assessments.

8. Health and Safety risk assessments are conducted as follows:

- Risk assessments undertaken by the Project Manager and, where appropriate, reviewed by Area Coordinators.
- Risk assessments specific to an area may be undertaken by the Area Coordinator.
- The findings of the risk assessments are retained in a Risk Assessment Log which is held electronically in the NFCC Shared Area. It is maintained by the Project Manager and reviewed regularly by the trustee with specific responsibility for Health and Safety issues.
- All Health and Safety incidents are captured within the Incident log which is retained electronically by the Project Manager.
- Significant risks are captured within the NFCC Risk Matrix.
- Action required to remove/control risks will be approved by the Project Manager.
- The trustee responsible for Health and Safety oversight will check that the implemented actions have removed/reduced the risks
- Assessments will be reviewed annually, or when the work activity changes.

### Consultation with Staff and Volunteers

9. Staff and volunteers are to be consulted with regards to Health and Safety matters through area team meetings.

### Safe Handling of Substances

10. NFCC has no central office or managed building and it is unlikely that staff or volunteers will be required to handle dangerous substances. Nonetheless to meet with regulation the Project Manager is nominated as the COSHH coordinator and if substances do become the responsibility of NFCC he/she will assess the risks from substances hazardous to health under the Control of Substances Hazardous to Health Regulations 2002 (COSHH). These are called COSHH assessments.

### Competency for Tasks and Training

11. All staff and volunteers are to given basic Health and Safety induction training when they start working with NFCC. Training will be provided if risks change, and refresher training provided when skills are not frequently used.

### Accident, Incidents, First Aid and NFCC Related Ill Health

12. Regulation requires that employees must receive specialist health surveillance for certain work. In the unlikely event that risk assessments highlights that any NFCC tasking requires such surveillance this will be done.

13. Reporting accidents and ill health at work is a legal requirement under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). Time limits for reporting accidents vary depending on the severity. Guidance is available from the Health and Safety Executive at <http://www.hse.gov.uk/>.

14. Since NFCC has no office or managed premises, and staff and volunteers generally work independently the trustees accept that first aid must be a personal responsibility.

## **SECTION 7:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

#### **BUSINESS CONTINUITY POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 26)

**Amended:**

#### **Introduction**

1. The object of the New Foundations Community Chaplaincy (NFCC) is to promote the rehabilitation and resettlement of ex-offenders in Hampshire, primarily through the provision of mentoring, advice, practical support and training. Given the vulnerability of the client base it is important to ensure that the service which is being provided is consistent and reliable. This document provides an accountable and pragmatic Business Continuity Plan that seeks to ensure that NFCC can maintain its service to clients in the event of an incident. The plan details rapid, initial, secondary and tertiary activities required to recover the business operations and thus maintain NFCC's ability to meet its charitable objects.

2. On a regular basis the NFCC Trustee Board considers credible risks which could impact upon the charity's ability to meet its objects. Risks are identified, assessed, evaluated, managed and reviewed. As far as is reasonably possible, this Business Continuity Plan deals with such risks and defines the actions that are necessary, and the resources needed, to allow the charity to continue to deliver its objects should any foreseen or unforeseen events impact on its operations. The steps outlined in this plan are not intended to provide an exhaustive list, or to cover every eventuality, but they do cover those risks highlighted on the Risk Matrix and are general enough to be a useful starting point in planning a response to any incident.

#### **Objectives**

3. The Plan's objectives are to:
- a. Provide details of procedures and resources needed to recover business critical functions.
  - b. Provide details of key contacts during an incident and during return to business as usual.

#### **Assumptions**

4. The development of this plan is based on the following assumptions:

- a. The primary output of NFCC is delivered through volunteer mentors who are fully supported, but on a day to day basis operate independently and have direct access to their clients as assigned by the charity.
- b. NFCC has no HQ and is managed by the members of the Executive Board operating from their homes.
- c. The IT is managed by the Project Manager at his home office. All relevant operational documents are stored online. The Information Security policy sets out how data is secured and managed.
- d. The service provided by NFCC is in support of, and addition to, the supervision of the client by NPS. Thus, in the event of an existential crisis for NFCC the clients would still have access to the Crown funded support of the National Probation Service.
- e. All volunteer mentors are members of a local church, thus in the event of an existential crisis for NFCC the volunteers would still be able to access pastoral support from their home church.

#### System Check

5. In the event of a serious incident or issue, smooth communication with the full NFCC team will be a key tool in ensuring unbroken service, maintaining the reputation of the charity and a smooth recovery. A telephone cascade system is therefore established in this plan (paragraph 8). A telephone call-out cascade test is to be conducted annually (including verification of contact numbers).

#### Accountability, Roles and Responsibilities

6. In the event of an incident or issue which could impact upon NFCC's ability to deliver its objects it will be important to gather a management team which can coordinate the response. Personnel are to be delegated into the following roles:

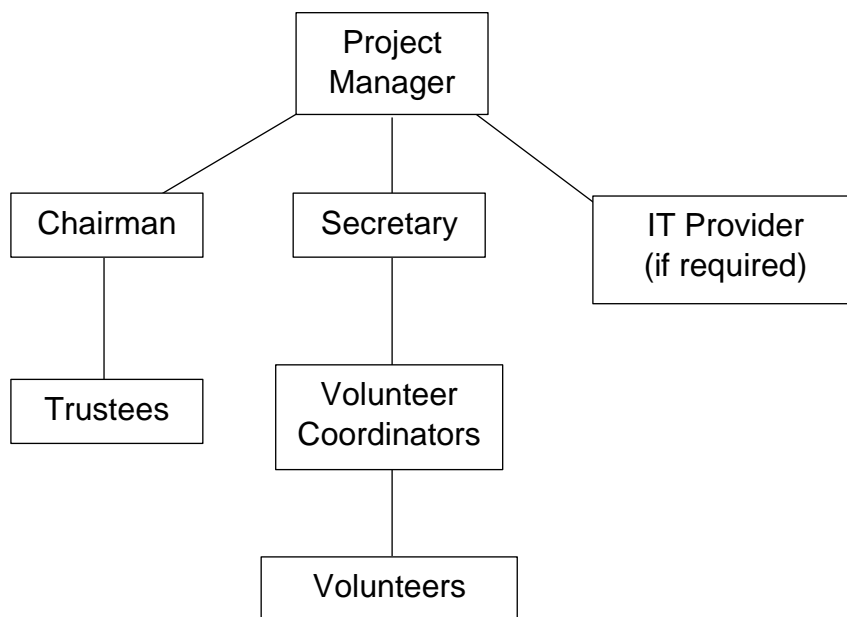
- a. The Project Manager is to assume the role of Business Continuity Manager with the overall responsibility for ensuring that continuous delivery of the charitable objects in the immediate and long term is at the centre of all responses.
- b. A trustee is to be assigned as the Incident Communications Manager with overall responsibility for internal and external communications throughout the incident. He/she is to ensure that all stakeholders are fed with information which is relevant to their need.
- c. A Business Continuity Team is to be formed using available expertise. This team will coordinate all actions as outlined in the Recovery Plan section at paragraph 9 below.

## Health and Safety

7. Health and Safety throughout the incident will be a key role for the Business Recovery Team. They are to continuously assess the risk of harm to any NFCC staff, volunteers, clients or other stakeholders, and where such a risk exists they are to make this their top objective.

## Notification

8. In the event of an incident or event which may lead to this plan being enacted, the first point of contact should be to the Project Manager, or should he be unavailable then the Chair of Trustees, or should neither be available then the Secretary to Trustee Board. The Project Manager, or the substitute, will then determine whether all NFCC personnel and volunteers need to be informed, and if so then the following telephone cascade system is to be used to pass the information:



## Response, Recovery and Review

9. It is impossible to prepare an action list to cover every eventuality, since every situation will be different. Nonetheless it is helpful for trustees to have considered how they may respond in advance of such a situation, and to have a broad response plan in place to help them as they consider all appropriate actions. The following procedure is to be used as a template for action:

- a. RAPID ASSESSMENT – The first few hours
  - Do emergency services need to be called?

- Where a crime is known to have been committed the police should be called as soon as possible.
- Gather the known facts. Some actions will need to be taken quickly, particularly in a safeguarding situation, but it is important to consider all the facts which have led to the concern. The concern may have come to the attention of trustees as a result of a complaint or an observation. It could be damaging to over-react to an unsubstantiated rumour.
- Begin a detailed narrative of what is known and the events as they unfold.
- Decide whether it is appropriate to call a meeting of the trustees, or the established Business Continuity Team to coordinate all activity relating to the matter.

b. INITIAL RESPONSE – The first 24-48 hours

- Prevent or minimise further damage or loss

If there is a risk of harm to beneficiaries/staff, damage or loss of assets then action should be taken to stop this immediately. This may involve stopping an activity, suspending staff who may be involved or removing spending authority.

- Assess the damage

Accepting that there will be some uncertainty, the potential damage should be scoped (best case and worst case). Where there are safeguarding or health & safety issues, err on the side of "worst case" until the facts are clear.

- Assess impact on service delivery

What has been affected? What needs to be recovered first? Consider most vulnerable beneficiaries first.

- Consider the Business Continuity Team

Does the Business Continuity Team have all the required expertise? Consider drawing in specialist knowledge from within the trustee board, executive staff or from a specialist organisation.

- Consider a Formal Investigation

It is important to have all the facts so that mid to long-term decisions can be considered. It will normally be appropriate to conduct a formal internal investigation. The investigation team should take into consideration any conflicting interests. It may be necessary to seek an independent advisor to lead the investigation where the issues and responsibilities are not yet clear.



- Acknowledge the incident

Decide who needs to be informed. Report to the Charity Commission, police, Action Fraud, safeguarding authority or other relevant regulator as appropriate.

Acknowledge the issue at the right level. Decide who needs to know. Where the incident is internal (for example a potential fraud) then it may only be necessary to let staff know that there is an issue and that an investigation is ongoing. Where the matter is more public (for example a safeguarding issue) then a message on the charity's website or a social media comment may be appropriate.

Where appropriate a press release should be prepared. A spokesperson should be selected from the Response Committee and all staff and trustees informed that media enquiries should be forwarded to that person.

Where staff are impacted by the issue, for example if they are unable to come to work because an activity has ceased, they should be informed personally and promptly.

c. SECONDARY ACTIONS – Within first two weeks (or on completion of internal investigation)

- Update communications messaging and update the narrative account.

Keep website, social media and press release updated. Give them the facts so that they don't make up their own.

- Ensure operational business continuity

Consider the full extent of the damage and its effect on services? How will this impact on the beneficiaries? What are the time frames for service recovery, what needs to be prioritised?

- Consider staff

Is disciplinary action required? Gross misconduct or negligence may warrant dismissal. Consider formal warnings. Start processes without delay.

Consider any medium term impact on staff. Any changes in working practice or temporary changes in procedures and policies.

- Consider donors and grant givers

Any incident has the potential to cause reputational damage, which will ultimately impact upon income and the ability for the charity to continue to operate. The message of the trustee's robust response to an unfortunate and unforeseen incident, and their focus on protecting

beneficiaries and continuing to deliver on their objects can have the effect of increasing trust and loyalty to the charity.

- Consider other Stakeholders

Who else may be interested or impacted upon. Contractors, beneficiary families?

Who needs to be contacted personally; what other messaging platforms might be considered?

d. TERTIARY ACTIONS – In slower time or ongoing

- Lessons Learned

Prepare a formal 'Lessons Learned' document which will help to ensure that similar incidents do not happen again.

- Consider whether all the Charities Policies were robust enough to deal with the matters as they unfolded. Would any policy changes reduce the risk of similar incidents occurring in the future?

In particular, is any ongoing training required for staff?

- Consider long term impact on business?

Revisit key vision and strategy documents. Have they been affected?

- Is there long term reputational damage?. How to rebuild and renew.

Will income streams be affected? Consider diversification.

- Consider Board Effectiveness

In the light of events, is the Trustee Board still appropriately formed. Are any trustees now conflicted. Would the Board benefit from any specific expertise.

- Risk Management

Many lessons will have been absorbed into the organisation, and the recent experience of the Board and Executive may have made them more sensitive to risks management. This may therefore be an appropriate moment to spend some time reviewing the risk matrix.

- Ongoing communications management

Do not just let the matter drop. Keep internal and external stakeholders informed on response and recovery. Prepare a closing statement on the issue listing what was done about it and why the charity should be considered as a responsible and trustworthy operation.

- Issue any apologies if necessary.

## **SECTION 8:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

### **EQUALITY AND DIVERSITY POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 26)

**Amended:**

#### **Introduction**

1. New Foundations Community Chaplaincy (NFCC) is committed to providing equal opportunities for staff and volunteers. This is primarily because it is a Christian charity and believes that all men and women are equal in the eyes of God. However, it also seeks to abide by the laws of the nation relating to unlawful discrimination in recruitment, selection, employment and in services relating to NFCC's stakeholders including partners, suppliers and beneficiaries. NFCC is committed to valuing diversity in the workplace, by creating an environment in which individual differences and the contributions of all staff, volunteers and beneficiaries are recognised and valued.

#### **Commitments**

2. NFCC's goal is to ensure that these commitments are embedded in the day-to-day working practices. The commitment will be demonstrated through:

- promoting equality of opportunity and diversity within the communities in which we work and with all our staff, volunteers and beneficiaries.
- aiming to build a team which reflects our community in which we work, with the aim of having parity of representation.
- encouraging engagement and participation from groups currently under-represented.
- reviewing our employment practices to ensure fairness.
- treating all those that we come into contact with fairly and with respect\.
- promoting an environment free from discrimination, bullying and harassment, and tackling behaviour which breaches this.
- recognising and valuing the differences and individual contributions that people make.
- providing support and encouragement.

3. Every person working with NFCC has a personal responsibility for implementing and promoting these principles. Compliance with this policy should ensure that NFCC does not commit unlawful acts of discrimination. Striving to ensure that the operating environment is free of harassment and bullying and that everyone

is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment.

### Training

4. NFCC will promote a spirit of Equality and Diversity to all staff and volunteers to help them understand their rights and responsibilities in relation to equal opportunities, and to create an environment that values diversity and is free of discrimination.

### Responsibility

5. Trustees, staff and area coordinators are responsible for ensuring that they actively promote equal opportunity.

6. All NFCC staff are expected to comply with the principles of Equality and Diversity. They must also read the Bullying and Harassment policy to ensure they understand what they can do to help create a working environment free of bullying and harassment. Where needed NFCC will provide additional training to volunteer coordinators to enable them to deal more effectively with complaints of bullying and harassment.

### The Law

7. It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy & maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief (including philosophical belief), because someone is married or in a civil partnership. These are known as "protected characteristics". Where a staff or volunteer post has been identified as requiring the post holder to be of a particular protected group, such as for example, a practising Christian, we will ensure that our use of the occupational requirement is consistent with and in line with equality legislation.

8. Discrimination after employment is also unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

9. Neither staff nor volunteers should discriminate against or harass each other, a client or a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

## Types of Unlawful Discrimination

10. **DIRECT DISCRIMINATION:** Direct Discrimination occurs when a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

11. **INDIRECT DISCRIMINATION:** Indirect discrimination occurs where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

12. **HARASSMENT:** Harassment occurs where a person suffers unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

13. **ASSOCIATIVE DISCRIMINATION:** Associative discrimination occurs where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

14. **PERCEPTIVE DISCRIMINATION:** Perceptive discrimination occurs where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

15. **VICTIMISATION:** Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. However, an employee is not protected from victimisation if he or she acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare his or her treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments and is then systematically excluded from meetings such behaviour could amount to victimisation.

16. **FAILURE TO MAKE REASONABLE ADJUSTMENTS:** Failure to make reasonable adjustments occurs where a physical feature or a provision, criterion or

practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

### Equal Opportunities

17. NFCC will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

18. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

19. NFCC will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if NFCC considers it has good reasons, unrelated to any protected characteristic, for doing so. NFCC will comply with its obligations in relation to statutory requests for contract variations. NFCC will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

20. NFCC will monitor the ethnic, gender and age composition of the existing team and the number of people with disabilities within these groups and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

21. NFCC cannot lawfully discriminate in the selection of employees for recruitment or promotion, but may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group that the trustees identify as being under-represented.

### Gender Identity

22. Gender identity refers to an individual's "personal sense of her or his gender" or inner sense of being a man or woman, regardless of biological sex.

23. Some people experience a gender identity that is somewhat, or completely, inconsistent with their sex appearance; or they may regard themselves as gender neutral, or non-gender, or as embracing aspects of both man and woman and, possibly, falling on a spectrum between the two. People have the right to self-identify, and many people reject the whole idea of binary tick-boxes, and describe

themselves in non-binary, more wide-ranging, open terms such as pan-gender, poly-gender, third gender, gender queer, neutrois and so on.

24. Gender reassignment is the process of transitioning from one gender to another. This is a personal process, not a medical process. This means that someone does not need to have undergone surgery or be under any kind of medical supervision to be classed and protected as transgender. When an individual decides to live openly in their acquired gender they have made a social transition.

25. The Equality Act 2010 outlaws' discrimination in employment and vocational training on the grounds of gender reassignment. Harassment or bullying on the grounds that a person is proposing to transition, is transitioning or has transitioned is unlawful discrimination and will not be tolerated at NFCC. Gender reassignment is one of the nine protected characteristics protected by the act.

26. There is no requirement for a transgender and transsexual person to tell NFCC about their gender reassignment status and questions about a possible transgender status should not be asked. It is unlawful to refuse to work with someone with the protected characteristic of gender reassignment.

27. NFCC will only identify a person's transsexual status if we have permission to do so. 'Outing' a person as transsexual is classed as direct discrimination under the Equality Act 2010 and could result in criminal charges under the Gender Recognition Act 2004. Disclosure of the fact that an employee has obtained a gender recognition certificate is a criminal act subject to a fine.

28. If during the recruitment process information is disclosed about a job applicant's gender history, for example because certain documents are in a previous name, NFCC will keep the applicant's gender history confidential and will not take this into account in the selection process, unless an occupational requirement makes this relevant.

### Dignity at Work

29. NFCC has a separate Bullying and Harassment policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with.

### Grievances

30. If you consider that you may have been unlawfully discriminated against, you may use NFCC's grievance procedure to make a complaint.

31. NFCC will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

32. Use of the NFCC's grievance procedure does not affect your right to make a complaint to an employment tribunal. Complaints to an employment tribunal must normally be made within three months from the date of the act of discrimination.



## **SECTION 9:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

#### **MODERN DAY SLAVERY POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 26)

**Amended:**

#### **Introduction**

1. This statement has been published in accordance with the Modern Slavery Act 2015 (the Act). It sets out the steps that New Foundations Community Chaplaincy (NFCC) will take to prevent modern slavery and human trafficking in its business and supply chains. This statement has been approved by the Chair of the Board.

#### **Business Model and Risk**

2. NFCC is a Charitable Incorporated Organisation, which seeks to welcome ex-prisoners into its community and to rebuild their lives. The primary method of achieving this is by establishing mentoring relationships between trained volunteers and the ex-prisoners, and working in partnership with churches, public, private and voluntary sector agencies to help reduce the chance of recently released prisoners re-offending.

3. Given this business model, and the fact that volunteers are selected and DBS checked, trustees assess that the risk of NFCC becoming involved with Modern Day Slavery or people trafficking is low. That said, it is possible that, through interaction with clients, volunteers may become aware of networks which involve human trafficking or modern slavery in some form. As a Christian organisation, it is important for the charity to be aware of the issue, to actively discourage its practice and to be ready to report any suspicion of its existence in our community.

#### **Vision**

4. NFCC's recognises that not all services the public needs can be met from the public purse. The problems for society are endemic, considerable and increasingly complex - from care to climate change, slavery to social cohesion - no one organisation or sector can tackle these on their own. Furthermore, while the public sector looks to reduce spending, respond better to users and innovate they are ill equipped to do so. Thus all organisations have a responsibility to help.

5. NFCC is committed to embracing the emerging momentum where social outcomes are increasingly being achieved at the intersection of the public, private and third sector. Its vision is that “no individual should leave prison and arrive in or return to our community and feel isolated, unforgiven, or unsupported.”

#### Ways of Working

6. NFCC’s ways of working prohibit human rights abuses and promote the United Nations Universal Declaration of Human Rights and the International Labour Organisation’s standards regarding child labour and minimum age. Where relevant, its policies and processes explicitly cover Modern Slavery.

7. Staff and volunteers are required to be familiar with the NFCC Operational Handbook which promotes good practice. Equalities, Safeguarding and Modern Slavery will be covered in the introductory safeguarding course. All staff and volunteers are encouraged to challenge any unethical, dishonest or unacceptable behaviour they encounter and to speak up if they see things that do not meet our high standards. The organisation has a clear Whistleblowing Policy (Section 13), where issues can be raised through clear processes. All reports are treated seriously and all concerns that are raised in good faith are investigated without bias and with absolute discretion.

8. Appropriate action is to be taken where behaviour has fallen below that which is acceptable for a Christian organisation. The Trustee Board has ultimate responsibility for the charity’s code of practice, and the Project Manager has responsibility for ensuring that these policies and practices are enacted in the day to day operations of the charity. However, everyone who works with or for NFCC has a responsibility to operate in an exemplary manner.

#### Actions to Prevent Modern Slavery

9. Whilst there is low risk of NFCC operations becoming involved or engaged with modern slavery or human trafficking, the following procedures are to be followed:

- a. NFCC’s recruitment policy explicitly commits the organisation to the prevention of modern slavery. NFCC managers carry out face to face checks on original right to work documents when they interview prospective employees.
- b. When new employees join NFCC, the pre-employment checks ensure that bank account details provided for the payment of salary match the name of the employee and where discrepancies arise we investigate and may require further assurance to ensure the employee is not

subject to modern slavery.

- c. NFCC will pay staff fairly and always more than the minimum wage.
- d. Since modern slavery is not static, NFCC commits to ensuring that staff remain aware of current issues and requires new and existing staff and volunteers to view the Home Office Modern Slavery Awareness booklet and the current “Gangmasters and Labour Abuse Authority (GLAA) training video entitled “Do the Right Thing.” This is currently at: <http://www.gla.gov.uk/publications/resources/glaa-videos/glaa-modern-day-slavery/>
- e. Reviewing processes to identify the specific risks associated with modern slavery and where improvements can be made.
- f. If, through their work with NFCC, any member of staff or volunteer becomes aware of human trafficking or modern slavery networks, or suspicious that they may exist, they should inform the Project Manager with the facts that they have become aware of. The Project Manager will liaise with the police or the GLAA on the charity’s behalf.

## SECTION 10:

### NEW FOUNDATIONS COMMUNITY CHAPLAINCY

### CONFLICT OF INTEREST AND ANTI-BRIBERY POLICY

Date of issue: (12 Feb 21)

Date of Review: (+ 5 years) (Feb 26)

Amended:

#### Introduction

1. Bribery is defined as: “giving or receiving something of value to influence a transaction.” This policy ensures that New Foundations Community Chaplaincy (NFCC) is compliant with the Bribery Act 2011 which came into force on 1 July 2011. (<http://www.legislation.gov.uk/ukpga/2010/23/data.pdf>). A person or organisation found guilty of bribery may face prosecution and a custodial sentence of up to ten years and/or a fine. Breach of this policy may result in employees being subjected to disciplinary action including dismissal.

2. This policy and procedure apply to NFCC, which includes all trustees, staff and volunteers.

#### Responsibilities

3. It is the responsibility of all parties defined above to prevent, detect and report any incidence of bribery associated with NFCC.

4. All parties must:

- Be aware and alert at all times of all bribery risk as described in this policy;
- Exercise diligence at all times when dealing with third parties on behalf of NFCC; and
- Report any and all concerns relating to bribery to the Project Manager or in accordance with NFCC’s Whistleblowing policy.

#### Offences

5. None of the parties, defined in 1.3 above, may:

- **Bribe another person** where financial advantage is offered to another person to perform improperly a relevant function or activity, or to reward a person for the improper performance of such a function or activity.
- **Accept a bribe** where a person receives or accepts a financial or other advantage to perform a function or activity improperly.
- **Bribe a foreign public official** where a person directly or through a third

party offers, promises or gives any financial or other advantage to a foreign public official in an attempt to influence them in their capacity and to obtain or retain business, or an advantage in the conduct of business.

6. Any trustee, staff member or volunteer of NFCC who has committed an act of bribery will be subject to the NFCC disciplinary procedure in addition to the sentence or fine of the court as indicated at paragraph 1 above.

7. All other parties associated with NFCC who commit an act of bribery may have their relationship/contract with NFCC terminated as a result.

### Responsibilities

8. The Trustee Board is responsible for assessing risk at NFCC and implementing procedures to reduce risk. The Risk Manager leads a review of the Risk Register at each Board meeting.

9. NFCC trustees assess that the greatest risk of bribery in the course of the charity's business to be associated with tendering for public service contracts and procurement of services from suppliers.

10. NFCC has robust procedures in place to defend itself against charges of bribery which includes Board oversight of contracts and monitoring by the Charity Treasurer. It will endeavour to follow best practice guidelines.

### Gifts and Hospitality

11. Gifts and hospitality offered to staff and volunteers are permitted provided that they:

- Do not involve cash;
- Are not given or received at the time of contracts being awarded or tendered;
- Do not exceed common sense or usual practice;
- Are agreed by the NFCC Treasurer;
- Are declared on the NFCC Gifts and Hospitality Log.

### Conflict of Interest

12. Parties are required to declare personal interest or gain in NFCC business. This is monitored by the Finance Director.

### Contract Procedures

13. The responsibility of Bidding and Tendering for Public Service Contracts lies with the PM.

14. NFCC may only act on information received through official commissioner portals, officially arranged meetings or in the usual course of normal communication and networking channels. It is strictly prohibited for NFCC to act on information

regarding bid opportunities procured through actions that are an offence under the Act.

15. NFCC must prepare any bid in strict accordance with the process outlined by the commissioner. It is strictly prohibited for NFCC to use any information, facts or evidence in support of its bid that is procured through actions that are an offence under the Act.

16. All NFCC bids will be released by the PM.

17. NFCC must adhere to the decision process outlined by the commissioner. It is strictly prohibited for NFCC to seek to influence the decision on the award of tenders through actions that are an offence under the Act.

18. NFCC must adhere to the post tender process outlined by the commissioner. It is strictly prohibited for NFCC to seek to influence the decision on the award or other related matter, such as price or performance measures, of contracts through actions that are an offence under the Act.

19. The approval for NFCC to sign a contract must be obtained in writing from the Trustee Board.

#### Procurement of Services

20. NFCC must invite initial expressions of interest in being part of the NFCC supply chain for contract opportunities through a single point of communication at the same time. It is acceptable for potential supply chain organisations to be asked to submit expressions of interest outside of this process through the use of normal communication and networking channels where NFCC staff becomes aware of potential suppliers.

21. It is strictly prohibited to solicit expressions of interest, or for potential suppliers to seek favourable treatment in this process, through actions that are an offence under the Act.

22. All organisations submitting expressions of interest must be subject to the common due diligence process. They must be scored on a consistent basis using the information they have provided for this purpose. It is accepted that there is a degree of subjectivity in the decision to progress an organisation to contract stage.

23. It is strictly prohibited for potential suppliers to seek favourable treatment in this process, either in the due diligence or award of contracts, through actions that are an offence under the Act.

24. All organisations operating contracts as part of the NFCC supply chain must be subject to the common performance management process. They must be managed on a consistent basis using the information provided for this purpose and the NFCC Performance Management Framework.

25. It is strictly prohibited for supply chain members to seek favourable treatment

in this process through actions that are an offence under the Act.

## SECTION 11:

### NEW FOUNDATIONS COMMUNITY CHAPLAINCY

### ENVIRONMENT AND SUSTAINABILITY POLICY

Date of issue: (12 Feb 21)

Date of Review: (+ 5 years) (Feb 26)

Amended:

#### INTRODUCTION

1. This policy considers the way in which NFCC manages environmental and sustainability issues. By its nature, the charity has a minimal physical footprint with most of its work being done through personal interactions. It has no headquarter office and does not make, sell or distribute physical products. That said, as a Christian organisation the NFCC trustees wish their organisation to be recognised as supportive of practices which demonstrate good stewardship or God's world and acknowledge that environmental and sustainable development is essential to ethical and sound business management.

2. The purpose of this policy is to provide an overview of the Environmental and Sustainability Standards of Operation that NFCC conforms to.

#### THE POLICY

3. NFCC's trustees recognise that the charity has a responsibility to the environment beyond legal and regulatory requirements. They are committed to reducing its environmental impact and continually improving environmental performance as an integral part of the business strategy and operating methods, with regular review points. NFCC will encourage clients, volunteers, suppliers and other stakeholders to do the same.

4. NFCC adheres to basic Sustainability Principles in three main areas:

- **Social Sustainability:** investing in communities through working with partner organisations and reinvesting surpluses in effective ways;
- **Economic Sustainability:** supporting reasonable economic growth through the encouragement of clients and helping them to improve their employability and accessibility to work;
- **Environmental Sustainability:** minimising waste in all aspects of the business and encouraging active involvement with environmental issues.



## SCOPE

5. The NFCC trustees are collectively responsible for ensuring that this Environmental and Sustainability policy is implemented. However, all staff and volunteers have a responsibility to ensure that the aims and objectives of the policy are met.
6. Environmental and Sustainability issues are taken into account in all other relevant policies, for example, the Finance Policy (covering procurement), and Health and Safety Policy.

## POLICY AIMS

7. NFCC trustees assess that this policy:
  - is appropriate to the nature, scale and environmental impacts of NFCC 's activities and services.
  - complies with applicable legal requirements and with other requirements to which NFCC subscribes which relate to environmental and sustainable issues.
  - provides a reasonable framework for setting and reviewing environmental objectives and targets.
  - is documented, implemented and maintained.

## ACTIONS

8. NFCC will, as a minimum:
  - Where possible, integrate sustainable development, as appropriate, into policies, plans and decisions.
  - Take into account the impact of business decisions and actions on partners and the environment.
  - Procure sustainable goods and services where it is not unreasonable to do so.
  - Minimise waste by reducing and reusing where possible.
  - Encourage our partners to work to these same standards.
  - Comply with and exceed all relevant regulatory requirements.
  - Continually improve and reduce environmental impacts.
  - Increase staff and volunteer awareness.
9. With regards to paper. NFCC will:
  - Minimise the use of paper, and reuse and recycle where possible.
  - Seek to reduce packaging.
  - Seek to buy recycled and recyclable paper products.

10. With regards to energy and water. NFCC will:
  - Seek to reduce the amount of energy used.
  - Switch off lights and electrical equipment when not in use.
  - Adjust heating with energy consumption in mind.
  - Take energy consumption and efficiency into account when purchasing new products.
  
11. With regards to office supplies. NFCC will:
  - Evaluate if renting or sharing is an option before purchasing equipment.
  - Evaluate the environmental impact of any new products before purchase.
  - Favour more environmentally friendly and efficient products wherever possible.
  - Reuse and recycle everything that it is able to.
  
12. With regards to transportation. NFCC will:
  - Reduce the need to travel, restricting to necessary trips only and encourage the use of public transport.
  - Promote the use of travel alternatives such as e-mail or video/phone conferencing.
  - Make additional efforts to accommodate the needs of those using public transport or bicycles.
  
13. With regards to maintenance and cleaning: NFCC will:
  - Use environmentally friendly control and use of cleaning materials.
  - Use licensed and appropriate organisations to dispose of waste.
  
14. With regards to monitoring and improvement. NFCC will:
  - Comply with and exceed all relevant regulatory requirements.
  - Continually seek to improve and monitor environmental performance.
  - Continually seek to improve and reduce environmental impacts.
  - Incorporate environmental factors into business decisions.
  
15. NFCC will seek to develop an organisational culture where:
  - Staff and volunteers are involved in the implementation of this policy
  - This policy will be reviewed and updated every 5 years.
  - Staff will be provided with relevant environmental training where necessary.
  - Suppliers, contractors and sub-contractors are encouraged to improve their environmental performance.

## **SECTION 12:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

### **CHILD EXPLOITATION AND EXTREMISM POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 26)

**Amended:**

#### **Overview of Prevent Duty**

1. The [Counter-Terrorism and Security Act 2015](#) contains a duty on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. Statutory guidance issued under Section 29 of the Act has been produced to help towards understanding the implications of the Prevent Duty.

2. In fulfilling the duty in Section 26 of the Act, it is expected that all specified authorities will participate fully in work to prevent people from being drawn into terrorism. This duty is known as the Prevent Duty. It applies to a wide range of public-facing bodies. How they do this, and the extent to which they do this, will depend on many factors, for example, the age of the individual, how much interaction they have with them, etc. The specified authorities in Schedule 6 to the Act are those judged to have a role in protecting vulnerable people and/or our national security.

3. Prevent has three main objectives. To:

- respond to the ideological challenge of terrorism.
- support vulnerable people and prevent people from being drawn into terrorism.
- work with key sectors and institutions and address risks.

It focuses on early intervention before any illegal activity takes place. The aim is to reduce the likelihood of individuals who support a violent extremist ideology of becoming terrorists.

#### **What it Means for Childcare Providers**

4. From 1 July 2015 all schools, registered early years' childcare providers and registered later years childcare providers (referred to in this advice as 'childcare providers') must have regard to the statutory guidance.

5. NFCC staff and volunteers will not undertake childcare in the delivery of its objects. However, it is feasible that through interaction with clients that volunteers or staff may become aware of families and circumstance. If this knowledge leads to a suspicion that a child may be vulnerable to radicalisation then it is essential that the charity responds effectively. This risk is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

6. In the first instance, should an NFCC volunteer suspect that a child may be at risk of radicalisation the matter should be raised with the Project Manager or the Safeguarding Officer.

#### What it Means to Providers of Services to Vulnerable Adults

7. As providers of services to adults who may be deemed vulnerable, NFCC has a duty to report any behaviour that may be considered extremist to the authorities. For the purposes of this policy “Extremism” is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It includes calls for the death of members of UK armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations.

#### General Risk

8. The general risks affecting children and vulnerable adults may vary from area to area, and according to their age. NFCC may be in an important position to identify risks within a given local context. It is important that staff and volunteers understand these risks so that they can respond in an appropriate and proportionate way.

9. *The responsibility for public protection and reducing re-offending gives both prisons and probation services a clear and important role both in working with offenders convicted of terrorism or terrorism-related offences and in preventing other offenders from being drawn into terrorism and the extremist ideas that are used to legitimise terrorism and are shared by terrorist groups.*

10. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection.

#### Channel

11. Channel forms a key part of the UK’s “Prevent” strategy. The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. Section 37(5) of the Counter Terrorism & Security Act requires Channel panels to be set up and chaired by the responsible local authority.

Members of the panel must include the responsible local authority and the police for the relevant local authority area under Section 37(1) of the Counter Terrorism & Security Act, and they have principal responsibility for Channel in their areas. The police co-ordinate activity by requesting relevant information from panel partners about a referred individual. They will use this information to make an initial assessment of the nature and extent of the vulnerability which the person has. The information will then be presented to the panel.

12. Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist related activity. Success of the programme is very much dependent on the co-operation and co-ordinated activity of partners.

13. Delivery Organisation Partner Providers should understand when it is appropriate to make a referral to the Channel programme. Channel focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people. It provides a mechanism for organisations such as NFCC to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

### Training

14. A Prevent eLearning module and an online general awareness training module on Channel are available. These modules are mandatory for NFCC staff to complete. They provide an introduction to the topics covered by this advice, including how to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types of intervention that may be appropriate, in addition to Channel.

## **SECTION 13:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

### **WHISTLEBLOWING POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 26)

**Amended:**

## **INTRODUCTION**

1. The New Foundations Community Chaplaincy (NFCC) is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff and other members of the charity to voice concerns in a responsible and effective manner. It is expected that all staff and volunteers will faithfully serve the charity and not disclose confidential information about other staff or volunteers' affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the charity then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

2. The Public Interest Disclosure Act, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The trustees have endorsed the provisions set out below to ensure that no staff or volunteers should feel at a disadvantage in raising legitimate concerns.

3. This policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the charity and is not a mechanism which should be used to reconsider matters that have already been addressed under harassment, complaint, disciplinary or other procedures.

## **SCOPE OF THE POLICY**

4. This policy is designed to enable staff and volunteers of NFCC to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. It is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

## **SAFEGUARDS**

5. Protection. This policy is designed to offer protection to staff and volunteers of NFCC who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

6. Confidentiality. NFCC will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

7. Anonymous Allegations. This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the trustees. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

8. Untrue Allegations. If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

## **PROCEDURES FOR MAKING A DISCLOSURE**

9. On receipt of a complaint of malpractice, the trustee or member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the Project Manager unless the complaint is against that individual. In such cases, the complaint should be passed to the Chairman of the Trustees.
- In the case of a complaint, which is any way connected with but not against the Chairman of the Trustees, the Vice Chairman will nominate an external party to act as the alternative investigating officer.
- The complainant always has the right to bypass the line management structure and take their complaint direct to the Chairman of the Trustees or another member of the Board of Trustees.

10. If there is evidence of criminal activity, then the investigating officer should inform the police. The charity will ensure that any internal investigation does not hinder a formal police investigation.

## **TIMESCALES**

11. Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or the police, it is not possible to lay down precise timescales for investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

12. The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

13. All responses to the complainant should be in writing and sent to their home address marked "confidential".

## **INVESTIGATING PROCEDURE**

14. The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the person against whom the complaint is made as soon as is practically possible. That person will be informed of their right to be accompanied at any future interview or hearing held under the provision of these procedures.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Chairman of the Trustees.
- The Trustee Board will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate procedures.



- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of procedures.

15. If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with any member of the Board of Trustees

16. If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, NFCC recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or bodies. A list of prescribed people and bodies can be found on the Government Website ([www.gov.uk](http://www.gov.uk)).

## **SECTION 14:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY COMPLAINTS POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (Feb 24)

**Amended:**

#### **INTRODUCTION**

1. New Foundations Community Chaplaincy (NFCC) is committed to providing the best possible service to the organisations and individuals with whom we work. We acknowledge, however, that there will be occasions when people may not be happy with some aspect of our provision. This Policy exists to make it easier for stakeholders to tell us when they are dissatisfied, or indeed when they have any comment or feedback which they wish to make about NFCC. All complaints will be taken seriously, and we aim to treat everyone with respect and consideration throughout the complaints process.

#### **WHAT CIRCUMSTANCES MAY LEAD TO A COMPLAINT**

2. Dissatisfaction may occur at any point in our process and whether you are a supporter, beneficiary or a member of our team we will welcome your feedback. The following list is not exhaustive, but complaints may arise if:

- You believe you have been treated unfairly on the grounds of your gender/race/religion/age/sexuality or for any similar reason
- You feel that we have failed to provide information about the NFCC or its services
- You feel that we have failed to provide a key service
- You feel you have experienced an unreasonable delay in receiving a service
- You feel that a service provided has been inadequate
- You believe that our staff have been rude or unhelpful
- You disagree with a decision we have made or a policy we operate

## **INFORMAL COMPLAINTS**

3. In the first instance you can make your complaint to the member of staff concerned, or to the Chair of trustees. Any member of staff or volunteer will be pleased to tell you who is the most appropriate person to approach. This may be done in person, by email or by telephone. We will listen to what you have to say, to apologise whenever necessary, and to try to agree a solution with you. We will try to deal with your complaint to your satisfaction immediately; however, there will be occasions when this may not be possible (for example during holiday periods). If there will be a delay in responding to your complaint you will be told, and we will reply as quickly as possible in writing. If you remain dissatisfied with us or with our response you should use the formal procedure outlined below.

## **FORMAL COMPLAINT**

4. You may use the following formal complaints procedure at any time: you do not have to complain informally first if you believe that your complaint is too serious for that approach.

5. Appendix A to this policy is a basic form which you may use to make your complaint; if you would prefer, you may write a letter or email instead. In either case, you should feel free to obtain assistance with writing your complaint if you need it; such assistance could be given by a friend or family member, a Citizens Advice Bureau or Advocacy group or a similar organisation. Useful contacts are given at the end of this Policy. You should then post or hand-deliver your complaint to the NFCC Chair of trustees, marking the envelope clearly 'Private & Confidential, for the attention of the NFCC Chair.

## **PROCESS**

6. NFCC will acknowledge receipt of your formal complaint within 3 working days; this will be done by letter. This letter will also tell you what steps will be taken to investigate your complaint: we will usually ask you to meet with us to discuss the problem (in which case you are welcome to be accompanied by a person of your choice from outside the organisation), and we may allocate responsibility for this meeting and the subsequent investigation to the Project Manager. If your complaint is about a member of staff nor volunteer, it will be passed immediately to the Project Manager; he/she will write to you to tell you that this has been done and to explain that our internal inquiry process has begun. We aim to resolve all complaints quickly, and to keep you informed throughout the process. You will receive a full written response usually within 7 working days; if there will be any further delay, you will be informed. This letter will include information on what to do if you are still dissatisfied.

## **CONFIDENTIALITY**

7. Your complaint may be seen by the Board of the NFCC as part of the investigation process but we will make every effort to safeguard your privacy; your complaint will not become 'public knowledge' unless you so wish. You should be aware, however, that if your complaint is specifically about a member of staff, volunteer or a Trustee of the Board of the NFCC, it will be necessary for that person to be told that a complaint has been lodged against him/her, to allow the investigation to proceed.

## **APPEAL PROCESS**

8. If you are dissatisfied with any aspect of the formal procedure outlined above, including the final response. You cannot go directly to the appeal stage unless you have used the formal procedure. If you wish to appeal, you should complete the form which will be attached to the letter sent to you after the formal procedure. Again, you can obtain assistance with this. You should post or deliver this form to the NFCC marking the envelope 'Private and confidential: for attention of the NFCC Chair'.

9. You will receive written acknowledgement of your appeal usually within 5 working days, along with information as to when and how it will be dealt with. A panel (consisting of three Trustees of the Board) will usually be formed to consider your appeal. You may attend this meeting (bringing a person of your choice from outside the organisation, if you wish to), or make written comments if you would prefer. Your appeal and the original complaint will be considered in detail, and you will receive a written response within 3 working days of the hearing. The NFCC will make every effort to comply with the decision or recommendations of the appeal panel.

## **OTHER FEEDBACK**

10. NFCC welcomes all comments and suggestions, and tries to take account of these where possible when planning work, etc. If you have any comment, positive or negative please telephone or email the Project Manager or Chair of Trustees using the 'Contact us' information on our website. Complaint Form

**APPENDIX A**

**COMPLAINTS FORM**

**Your name**

**Your address**

**Your telephone number**

Please help us to monitor our complaints by providing the following information which will be kept confidential, and will not be considered alongside your complaint. You are not obliged to include this information if you do not want to:

**Your Gender (circle)**

Female

Male

**Your Ethnic Origin (circle)**

Asian/Asian British

Black/Black British

Mixed

Arab

White

Other (Specify) .....

**Do you have a disability?** Yes

No

**What is your complaint?**

(please continue on a separate sheet if necessary)

**Ideally, what would you like us to do about it?**

**Your Signature**

**Date**

Please return as directed on the Policy attached.

## **SECTION 15:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY** **GRIEVANCE POLICY AND PROCEDURE**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (2025)

**Amended:**

#### **PURPOSE AND SCOPE OF THE PROCEDURE**

1. The purpose of the grievance procedure is to ensure that, as far as possible, grievances are dealt with and resolved informally through discussion between the aggrieved worker and their line manager. Grievances are concerns, problems or complaints raised by a worker and must be made in writing. However, before using the grievance procedure it is expected that a worker will try to resolve their complaint informally if at all possible. The formal stage of the procedure should only be used when the informal stage has failed to resolve the issue or is not making progress at reasonable speed. For the purposes of this policy and procedure, the term 'worker' refers to both staff and volunteers.
2. In appropriate cases New Foundations Community Chaplaincy (NFCC) may offer facilities for mediation.
3. This procedure applies to all NFCC personnel.
4. This procedure takes account of the ACAS code of practice on grievance procedures and will be reviewed periodically in line with developments in good practice.

#### **PRINCIPLES OF THE PROCEDURE**

5. The procedure is based on the following principles:
  - A worker has the right to be accompanied by his/her trade union representative or work colleague at every stage of the formal procedure. The procedure is internal to NFCC and apart from external trade union representatives, does not allow for any external representation
  - Any grievance must be made in writing as soon as possible and in any case within one month of the act that is being complained of
  - it is only possible to hear complaints that are within the power of NFCC to remedy
  - In all cases, reference to the Human Resources department (HR) is recommended
  - All proceedings, whether informal or formal, should, so far as is practicable, remain confidential
  - A formal record of a hearing will be available to the worker. The hearing

will be recorded and a copy given to the worker

- The timescales set out may be extended with the agreement of the parties
- Where more than one worker has lodged a complaint relating to the same, or substantially the same, issue, the complaints may be dealt with together in the interests of fair and consistent decision-making.
- Where a grievance concerns an apparently trivial issue the line manager will discuss this informally with the member of staff to determine whether there is a real need to pursue the matter through the grievance procedure. If the member of staff and line manager are unable to agree, the line manager will decide seeking appropriate HR advice, whether the matter is trivial. If the grievance is determined to be trivial, the worker will be informed that the matter will not be dealt with through the grievance procedure the worker will be entitled to resubmit the grievance together with any further evidence or explanation that throws new light on it, and demonstrates that a substantive complaint is in fact being made.
- If the worker's grievance restates a complaint that NFCC is already dealing with, or that it has dealt with in the past, the worker will be asked to explain how the new grievance differs from the previous one, and either what new incident has occurred or what new evidence has come to light. Where it is clear that there is nothing new being raised, NFCC can reject the grievance without a hearing
- Deliberately false or malicious grievances will be treated as matters of misconduct and will be investigated in line with the Disciplinary policy and procedure
- Grievances raised while an worker is subject to disciplinary proceedings will be heard when the disciplinary process has been completed. If the grievance has any bearing on the disciplinary proceedings, it can be raised in the course of those proceedings.

## **INFORMAL STAGE**

6. If a worker has a complaint that involves another worker or other workers, they should first of all try to resolve the matter by direct approach to the worker or workers involved.

7. If the matter remains unresolved, the worker may request a meeting with their own line manager who will try to resolve the issue. The meeting should be held within 10 working days of the submission of the request.

8. If, after any action to resolve the grievance taken by the line manager, the worker is still dissatisfied, they may proceed to the formal stage of the procedure.

9. If the complaint is against the line manager or there is another reason why the worker does not wish to raise it with their manager they should seek advice from the Chair of Trustees on how to deal with the complaint.

## **FORMAL STAGE**

10. If the complaint has not been resolved at the informal stage and the worker wishes to proceed to the formal stage, the worker may do so and the complaint will



be heard by a panel. The worker must set out in writing the nature of their complaint and the reasons why they are dissatisfied with the outcome of the informal stage. The worker should explain how they think it should be settled. This must be submitted to the complainant's Line Manager. Grievances raised against a Line Manager should be submitted to the Project Manager and grievances raised against the Project Director should be submitted to the Chair of the Board.

11. Should the complaint relate to a process or decision, the Director will appoint an appropriate investigating officer who will be asked to provide a full written report together with any relevant documents. The investigation should be conducted as quickly as possible while allowing for all relevant information and evidence to be gathered. A timescale for this will be agreed between the worker and the Project Director.

12. Should the complaint be against a named individual or individuals, they will be given a copy of the complaint at the earliest opportunity. The individual will present their response at the hearing and it would not normally be necessary to conduct an investigation.

13. The panel will consist of the Project Manager and at least one member of the Board. Grievances submitted by Line Managers will be heard by the Project Manager and a member of the Board, and grievances raised by the Project Manager will be heard by members of the Board. Where possible, there should be a gender balance on panels. NFCC will make every attempt to ensure that the hearing will be held within 10 working days of receipt of the investigating officer's report, or within 10 working days of the complaint being received if it is against an individual. The worker will be given five working days' notice that the hearing is to be held. The worker may request an alternative date to allow up to an additional five working days if their representative is unavailable. If following a reasonable attempt to rearrange the hearing, the worker is still unable to attend, they may send a representative, or the hearing may be held in their absence.

14. The complainant should ensure that they attend the meeting at the specified time. If they are unable to attend because of circumstances beyond their control, they should inform their line manager and/or the chair of the panel if the grievance is against their line manager, as soon as possible. If they fail to attend without explanation, or it appears that they have not made sufficient attempts to attend, the hearing may take place in their absence.

15. Any relevant written information or evidence must be made available to all parties at the earliest opportunity and, in any case, two working days before the hearing.

16. All parties involved will be allowed to attend and make representations at the meeting. Witnesses may be called.

17. Refusal of either party to attend shall not invalidate the proceedings.

18. The panel, in seeking to resolve the complaint, may adjourn the meeting or defer a decision if more information is required.

19. The decision of the panel, reasons for that decision and any redress will be

communicated to the worker who has made the complaint. Where the complaint is against an individual, both parties will be given a copy of the decision. This will be handed to the worker whenever possible or posted directly by recorded delivery to the worker within three working days of the hearing and to the worker's representative, where applicable.

20. Failure to meet the requirements of redress set out by the panel will result in the invocation of the Disciplinary policy and procedure, unless an appeal has been lodged

## **RIGHT OF APPEAL**

21. Should the complainant wish to appeal against the decision of the panel they must do so, in writing, to the Project Manager (or to the Chair of the Board if the grievance was heard by Board members) within five working days of being informed of the decision.

22. A request for an appeal must specify the grounds of the appeal preferably under one or more of the following headings:

- the nature of any redress
- the finding of the hearing on a point of fact which is pertinent to the decision of the hearing
- a failure to adhere to the published procedure.

23. A member of the original panel will attend to present their findings and reasons for their decision. Witnesses may be called.

24. The appeal will be heard by the Chief Executive or nominated deputy and another manager with a member of HR to advise. An appeal to a grievance raised by a member of the Directorate will be heard by members of the Board. An appeal to a grievance raised by the Chief Executive will be heard by the Chair of the Board and a further member of the Board. The appeal panel members, the worker and the management representative should receive the written cases five working days before the hearing. The format of the appeal hearing will depend upon the nature of the appeal. If it is a re-hearing it will follow the format at Appendix 1. The worker will be given five working days notice that the hearing is to be held. The complainant may request an alternative date to allow up to an additional five working days if their representative is unavailable. If following a reasonable attempt to rearrange the hearing, the worker is still unable to attend, they may send a representative, or the hearing may be held in their absence.

25. The complainant should ensure that they attend the meeting at the specified time. If they are unable to attend because of circumstances beyond their control, they should inform their line manager as soon as possible. If they fail to attend without explanation, or if it appears that they have not made sufficient attempts to attend, the hearing may take place in their absence.

26. The appeal is not a rehearing of the original grievance, but rather a consideration of the specific areas with which the worker is dissatisfied in relation to the original grievance. The chair of the panel may therefore confine discussion to those specific

areas, rather than reconsider the whole matter afresh.

27. The panel will hear all or part of the previous hearing depending upon the nature of the appeal. The panel has the scope to:

- uphold all or part of the previous decision
- not uphold the previous decision.

28. If the panel decides either to uphold only part of the previous decision or not to uphold the previous decision, it may at its discretion substitute an appropriate remedy of its own choosing.

29. Within three working days of the appeal the panel will record the decision and hand it to the worker wherever possible otherwise it will be posted directly by recorded delivery.

30. Any recommendations made by the panel will be notified to the appropriate individuals, and will be time bound. Failure to meet the requirements of the panel will result in the invocation of the Disciplinary policy and procedure.

31. The decision of the appeals panel is final.

## Appendix 1

### Format of the formal grievance / grievance appeal hearing

1. The panel shall be responsible for the proper conduct of the hearing, which shall be conducted on a formal basis.
2. The chair of the panel will conduct the introductions of those present and confirm the names of any witnesses who may be called. The chair of the panel will ensure that all parties understand the nature of the complaint and ask the worker who is bringing the complaint to say how they would like to see the situation resolved.
3. The panel shall order the proceedings as follows:
  - Ask the worker to present their case allowing the investigating officer or respondent to ask questions after the presentation has been completed. The worker may call witnesses or refer to documents previously circulated and necessary for the hearing.
  - While the complainant will be given every opportunity to explain their case fully, they should confine their explanation to matters that are directly relevant to the complaint. The chair of the panel will intervene if he/she thinks that the discussion is straying too far from the key issues. The chair may also intervene to ensure that the meeting can be completed within a reasonable timeframe, depending on the nature and the complexity of the complaint
  - Ask the investigating officer or respondent to respond to the case, allowing the worker to ask questions after the presentation has been completed. The investigating officer or respondent may call witnesses or refer to documents previously circulated and necessary for the hearing.
  - The panel may ask questions on points of clarification at any time and may call witnesses. Questions shall be put to each party after it has presented its case.
  - If either party wish to present evidence not previously circulated the hearing may be adjourned to allow the other side to consider it.
  - Allow the worker and then the investigating officer or respondent the opportunity to sum up their cases. Neither party may introduce new matters in their summing up.
4. The panel adjourns to consider its decision, which shall be given as soon as possible after the hearing, but in any case within three working days of the hearing.
5. At the same time the worker shall be advised of their right to appeal against the decision.

## Appendix 2

### Guidance for appeal documentation

#### Worker

1 Grounds of appeal.

2 Case statement, which should include as appropriate:

- introduction explaining the reasons for appealing
- summary of case
- outcome sought
- appendices

#### Management

1 Response to grounds of appeal

2 Case statement, which should include as appropriate:

- introduction, background to the case, processes followed on calling the original hearing, how the decision was arrived at
- summary of case
- recommendations
- appendices

If papers are presented in this way it should be possible for the appeal hearing only to hear any specific comments or particular aspects of the case, rather than a repetition of the original hearing.

## **SECTION 16:**

### **NEW FOUNDATIONS COMMUNITY CHAPLAINCY**

#### **QUALITY POLICY**

**Date of issue:** (12 Feb 21)

**Date of Review:** (+ 5 years) (2026)

**Amended:**

## **INTRODUCTION**

1. This document is the Quality Policy of New Foundations Community Chaplaincy (NFCC). It is the property of NFCC and is a controlled document. The purpose of this policy is to provide an overview of way NFCC carries out its activities and controls the quality standards of its operations.
2. NFCC's customers ("the clients") are the charity's beneficiaries, namely ex-prisoners who are rehabilitating in Hampshire post release.
3. NFCC is controlled by its Board of Trustees who have ultimate responsibility for setting the charity's strategy and approving all policies and procedures. The day to day management of the operations is conducted under the supervision of an Executive Board led by the Project Manager. The Trustees understand the necessity for strong leadership and strategic planning, and are committed to ensuring excellence in everything that the charity delivers. This commitment, coupled with the NFCC core values of "Caring, Professional, Practical and Empathetic" underpin all the charity's activities.

## **PEOPLE**

4. On joining, all staff and volunteers undergo a comprehensive training and induction programme that reflects their role in the charity. This process is designed to enable them to understand their role, and how it fits with achieving the wider strategic objectives of NFCC.
5. All staff and volunteers have regular one to one meetings with their line manager to cover learning and development, their objectives and to provide an opportunity to discuss all aspects of their work. Any issues, particularly lessons concerning good and bad practice, which arise from these discussions are shared with the whole team. In this way NFCC seeks to continuously develop and improve its operations.

## **APPROACH**

6. NFCC's primary output is the mentoring service which is provided to its

clients. This is generally delivered on a one basis and successful outcomes are highly dependent on the history and personality of the client as well as the personal chemistry between the mentor and the client. However, the charity has a robust Quality Management system to ensure that the service provided is at a consistently excellent standard. The Project Manager is responsible for ensuring that the system is enacted and embedded within the operational delivery process.

7. NFCC has an Impact Monitoring Process which, along with Trustee Board and Executive Team meetings, mentor supervision discussions and group discussions allows the management team to understand how effective and efficient NFCC is in achieving its charitable objects. These procedures are all part of the ongoing process of continuous improvement.

8. NFCC is committed to delivering quality mentoring to its clients. The aim is to exceed the expectations of the clients and other stakeholders by delivering the highest quality services. NFCC is committed to continuously improving its effectiveness.

9. All staff and volunteers have a responsibility to accept their personal involvement in this process, but specific responsibility for quality falls upon the Project Manager who will ensure that this Policy remains appropriate to the purpose and objectives of NFCC, and that it is communicated to and understood by staff and volunteers.

10. NFCC aims to provide a good quality mentoring in the right place and at the right time for every applicant. However, it will not allow quality to take second place behind cost or time constraints; in most cases no mentoring is better than poor or unsafe mentoring. All staff and volunteers are encouraged to question decisions or actions if they feel that quality is being compromised. Any action that NFCC undertakes will always take full consideration of the impact of that action on its partners. NFCC will always seek to avoid actions which may harm, intentionally or otherwise, the reputation and integrity of its partnerships.

11. NFCC will ensure that it defines and agrees with its partners a series of deliverable quality assurance checks which are specific to any opportunity or project that it enters into. A clear process will be applied through which progress and attainment against such indicators is periodically tested at a frequency that is appropriate to the scale of the project and the expectations of the partner and commissioner. Should NFCC or our partners fail to achieve qualitative performance against these agreed indicators, then appropriate remedial action will be put in place to rectify this.

12. NFCC will ensure that it maintains clearly documented procedures through which staff, volunteers, clients or partners can raise any concerns or complaints about the service that has been delivered, and through which all such complaints are appropriately investigated. NFCC will ensure a fair and balanced approach in all such cases and will work to resolve any potential disputes as amicably as possible where it is shown upon investigation that service delivery has clearly fallen below the agreed quality levels.



13. NFCC will take account of the quality credentials and reliability of any third-party supplier or partner that it may engage with. Subcontractors who fail to live up to the quality credentials stated at the point of procurement will be removed from NFCC's supply chain. NFCC will appropriately monitor the activity of all third-party suppliers to ensure that their own commitment to quality is no less than the measures set out in this policy.

14. Copies of the Quality Policy are made available to all members of staff at induction and when reviewed. Copies of Management Reviews, or extracts thereof, are provided to individual members of staff in accordance with their role and responsibilities as a means of communicating the effectiveness of the Business Management System.

### **QUALITY ASSURANCE PROCESS**

15. NFCC puts the client at the centre of everything it does within a culture of 'getting it right first time' and customer service excellence. Robust self-assessment and continuous quality improvement sit at the heart of activities, alongside planning, development and budgeting.

16. The Project Manager is responsible for ensuring that quality standards are being met, and that effective continuous improvement is taking place. He/she supports mentors and ensures that emerging risks are identified, assessed, and where appropriate; mitigated.

17. The following NFCC Quality matrix gives an overview of the assurance and improvement activity that takes place throughout the mentoring delivery process to support excellence throughout our provision.  
(PM: Project Manager. AC: Area Coordinator)

QA STAGE		DESCRIPTION	Responsible Person
<b>RECRUITING/SELECTION PHASE</b>			
1	Introduction	An introductory interview will occur after a potential mentor shows interest in volunteering with NFCC. This interview will provide an initial feel for suitability for both the potential volunteer and the PM.	PM or AC
2	Reference	At least one reference will be taken up, normally from a church leader, to provide assurance that the volunteer is likely to be a suitable mentor.	PM
3	DBS	A DBS check will be required to ensure that	PM

		there are no known reasons to prevent the volunteer working with potentially vulnerable adults.	
<b>TRAINING/INDUCTION PHASE</b>			
4	Training Day	The potential mentor will complete a training day during which there is significant interaction and role play type instruction. While it is not a formal pass/fail course, the trainer is able to assess the volunteer's general suitability for a mentoring role. After the training is complete the trainer and volunteer will discuss the day and will together decide whether is appropriate for the volunteer to become a volunteer.	Trainer
5	Induction	In addition to the mentor training programme, the PM will conduct one to one discussions with the volunteer to induct them into the NFCC way of doing business and the NFCC core values. At this point the PM must make the final decision as to whether the volunteer can be accepted as a mentor.	PM
<b>DELIVERY PHASE</b>			
6	Introduction	The PM will ensure that the mentor is paired with a suitable client and will lead the introduction in a 3-way initial meeting. The PM will assess the personal chemistry involved and decide whether the pairing is appropriate and safe.	PM Mentor Client
7	Handover	The PM may also attend the first mentoring session as an observer, to provide reassurance that the mentor/client partnership is likely to succeed. This stage will not be required for experienced mentors.	Mentor PM Client
8	Supervision	During the first year of volunteering the PM will conduct a supervision de-brief with the mentor every six weeks. (less frequently after the first year) This 2 way interview will allow feedback and reflection on the	PM Mentor

		progress of the mentor/client relationship. Any difficulties can be shared and additional support requirements identified.	
9	Ongoing	The client will always have a second point of contact within NFCC. This will either be the PM or the AC. Thus, if the client has difficulty with the mentor there will be an opportunity to raise these issues with a third party.	PM AC
ANNUAL EVALUATION			
10	Annual appraisal	On an annual basis the PM will formally meet with each mentor to discuss progress and ways in which NFCC may be able to improve both its support to that individual mentor and its general practice.	

## SUMMARY

18. NFCC seeks to assure clients and partners that the mentoring service which it provides is quality checked and consistent. Its ongoing, “through the process” approach to quality assurance will ensure that NFCC is a trusted partner of choice in the Hampshire region.

19. The quality management process will not only assure the quality of the mentoring provided today, but will also drive continuous improvement to make sure that NFCC provides a model of excellence which others would seek to emulate.