



# **The Devonshire Association**

## **Policies document**

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## **Policies**

The following policies, subject to annual review, have been approved by the Executive Committee:-

1. Conflicts of Interest
2. Risk Management
3. Complaints
4. Vulnerable Beneficiaries
5. Pay Policy
6. Investment
7. Volunteer Management
8. Data Privacy

Nick Wells  
Hon. Secretary

## 1. Conflict of Interest Policy

Approved June 2017

Next review May 2018

The policy forms part of the Association's governance arrangements.

The policy explains the Association's approach to conflicts of interest and documents the responsibilities of the Executive Committee (who are also the Trustees). While this policy is subject to annual review by the Executive Committee, conflicts of interest are addressed as they arise.

The Association understands the importance of reporting conflicts of interest as this is an important safeguard to protect the interests of the Association.

The Executive Committee will strive to avoid any conflict of interest between the interests of the Association on the one hand, and personal, professional and business interests on the other. This includes perceived as well as actual conflicts.

The purpose of this policy is to protect the integrity of the Association's decision-making process, to enable members and others to have confidence in our integrity, and to protect the integrity and reputation of Executive Committee members.

The risk of such conflicts arising is currently assessed to be low. The most significant potential conflicts lie in the granting of contracts to third parties such as publishers, printers or venue providers.

Such potential for conflicted interests is managed by:-

Executive Committee members are required to notify a conflict of interest to the Committee should such arise, in advance of or during a meeting, and to stand aside from decisions made on matters where they are conflicted. Typically, Executive Committee members will be asked to leave the room for discussion of the item and the minutes will record who was present for the discussion and decision. With effect from February 2017, in line with good practice, there is a standing agenda item for members to declare any conflicts of interest, at the start of the meeting.

With effect from June 2017, a register collating Executive Committee interests will be compiled drawing on declarations of interests made with such declarations to be held on file by the Registrar. In future, upon election or co-option, each Executive Committee member will make a full, written disclosure of interests, such as relationships, and posts held that could potentially result in a conflict of interest. Such disclosure will be included in the register referred to above.

In addition, decisions committing expenditure above modest limits (£500 pa for individual officers) are required to be taken by the Treasurer and Chairman; while those above £2,500 per item are required to be taken by the Executive Committee as a whole.

When entering into a new financial commitment more than one quote should be obtained, unless the expenditure is under £1,000. For repeat arrangements, we seek to ensure expenditure is broadly at the same cost as previously, as well as broadly in line with the market.

The Policy will be shared with Branches and Sections so that they can develop an approach in line with this policy.

## 2. Risk Management Policy

Approved	May 2017
Last Reviewed	April 2018
Next review	April 2019

The policy forms part of the Association's governance arrangements.

The policy explains the Association's approach to organisational risk management and documents the responsibilities of the Executive Committee (who are also the Trustees). While this policy is subject to annual review by the Executive Committee, risks are addressed as they are identified.

The Executive Committee understands the importance of identifying and mitigating risk as unmanaged risk can impact the Association's ability to meet its aims and at its worst lead to closure.

The Executive Committee has responsibility for overseeing organizational risk management and in communicating its approach to risk.

An open approach to mitigating identified risks is adopted by the Committee. Risks are openly discussed and solutions are put forward for evaluation. When presenting significant plans and proposals, such as for events, Executive Committee members are asked to show the total financial commitment on a worst case basis as well as a realistic budget. Typically, 'what if' scenarios are examined. The varied skills and experience of the Executive are brought to bear.

The Association's appetite for risk is low. The Executive Committee determines what types of risk are acceptable and which are not. Major risks have been identified, taking into account the list of risks set out on the Charity Commission website. These risks are monitored.

In 2016, the Executive undertook a risk workshop to develop a list of major risks facing the Society. The Executive then set down mitigation where possible for each top risk. Risks include physical, people, premises, IT, and finances. These risks and their mitigation will be kept under at least annual review.

### **3. Complaints Handling Policy**

Approved      May 2017  
Next review    September 2018

The policy forms part of the Association's governance arrangements.

The policy explains the Association's approach to handling complaints and documents the responsibilities of the Executive Committee (who are also the Trustees) and the Registrar. This policy is subject to annual review by the Executive Committee.

The Association accepts that from time to time it will receive complaints. With limited resources, including one part-time employee and otherwise reliance on volunteers, the service expected by some members and other contacts may exceed what is possible or reasonable. Genuine mistakes can also be made.

All expressions of dissatisfaction whether written, by phone or in person, will be reported by the Registrar or Executive Committee member to the Hon Secretary. A record should be kept. The Hon Secretary will be responsible for determining the response to complaints. The Hon Secretary should inform the Executive Committee about the complaint and action taken.

Complaints will be responded to politely. A response should be provided immediately where possible and no later than 10 working days after receipt.

Should the response not resolve the complaint, the Hon Secretary will escalate the complaint to the Chairman and a further response will be made.

Should this not resolve the complaint, the Association will respond to say that it has exhausted its procedures and that it has recorded the failure to agree. In some circumstances, it may be appropriate to end the relationship by return of the current year's annual membership subscription.

## 4. Vulnerable Beneficiaries Policy

Initial Approval	May 2017
Last Reviewed	February 2018
Next review	February 2019

The policy forms part of the Association's governance arrangements.

The policy explains the Association's approach to vulnerable beneficiaries and documents the responsibilities of the Executive Committee (who are also the Trustees). This policy is subject to annual review by the Executive Committee.

Vulnerable beneficiaries are defined by the Charity Commission in their Policy Paper on this topic published on the internet, as children and persons under the age of 18 and adults who are in receipt of a regulated activity. Regulated activities are further defined as the provision of healthcare, relevant personal care, and/or social work; assistance with general household matters and/or in the conduct of the adult's own affairs; and /or an adult who is conveyed to, from, or between places, where they receive healthcare, relevant personal care or social work because of their age, illness or disability. It is the responsibility of charity Trustees to safeguard such individuals from maltreatment and to prevent impairment of health.

As membership of the Association is open to the general public, and non-members may attend the Association's events, it is possible that vulnerable beneficiaries could participate in the Association's activities. However, without a screening process, which may be regarded by members and attendees as intrusive and inappropriate, this vulnerability may not always be evident.

In order to mitigate potential problems, the Trustees therefore require the following actions to be taken:

1. Those running meetings or events should as a matter of course pay close attention to the safety of all those attending. Access for disability should always be considered and where possible, provision made.
2. Those aged under 18 attending the Association's activities may only do so in the company of a responsible adult. That adult will be responsible for the safeguarding and welfare of the child or youth.
3. The Registrar will notify the Committee of any members, or those seeking to join, aged under 18, and a relevant responsible adult will be contacted to advise what is necessary in order for their child to attend meetings or events.

## 5. Pay Policy

Approved	May 2017
Next review	May 2018

The policy forms part of the Association's governance arrangements.

The policy explains the Association's approach to paying its one employee. The employee, our Registrar, works part-time.

The Association understands the need to pay its employees at a level which supports their retention and provides appropriate motivation.

The level of base salary is benchmarked by reference to an internet search, for example, of salaries offered under live charity vacancies in the South West.

Base Annual Salary is reviewed each year on the anniversary of the Registrar's commencement of employment, currently September.

The Review will not necessarily lead to an increase in the level of pay. Increases in responsibility and in the cost of living are taken into account when reviewing the level of pay.

Any increase in Base Annual Salary is recommended by the Hon. Secretary, who is the Registrar's line manager, for approval by the Chairman and Treasurer. Details of the revised salary amount should be provided to the Executive Committee.

The current level of pay exceeds the National Minimum Wage.

Where the employee works, by mutual agreement, hours additional to those contracted, pay is at the standard hourly rate.

Pension contributions are made in line with current Government legislative requirements relating to pensions auto-enrolment.

## 6. Investment Policy

Approved	December 2017
Next review	December 2018

The policy, which forms part of the Association's governance arrangements, explains the Association's investment objectives and how it seeks to achieve them. It is subject to annual review by the Executive Committee.

The scope of the Association's investment powers are set out in Rule 3 vi) of the Rules, 2004: 'the Association may invest the monies of the Association in such investments or securities as may be authorised by law for the investment of charity funds'.

A deposit account is held and the Association's long-term investments are invested in the stock market on advice received from our stockbroker, who specialises in private clients. Our stockbroker is authorised and regulated by the Financial Conduct Authority and is a member of the London Stock Exchange.

Our stockbroker provides an Advisory Managed service to the Association, recommending changes to the investment portfolio. The final decision on such changes rests with the Trustees. In this regard, the Executive Committee has nominated three individuals, to act on their behalf, so that it is not necessary to bring all Trustees together to make a decision. The nominated Trustees are the Chairman, Hon. Treasurer and Hon. Secretary. Decisions may be made by no less than two of these three individuals.

As well as contact by phone and email, face-to-face meetings take place periodically with the manager in the stockbroker's Private Client team responsible for our portfolio.

Investment income is an important part of the Association's funding. Accordingly, the primary investment objective is balanced return, that is, a balance between capital growth and income, subject to a medium level of risk. This appetite for a medium level of risk is considered appropriate in view of the intended long-term nature of our investments.

The Association has a diversified portfolio held in funds rather than individual Ordinary stock, with underlying exposure to UK equities, global equities and bonds. The types of holdings include but are not limited to UK and Overseas Investment Trusts; Open-Ended Investment Companies/Unit Trusts; Preference Shares and Government bonds.

Instructions have been given to our stockbroker that as changes are made to the investment portfolio, future purchases are not made into funds with known holdings in the tobacco, alcohol and defence/firearms industries.

Our broker typically provides reports every six months. Investment performance is reviewed at least annually by the Trustees when reviewing the annual Accounts. Ad hoc performance reports can be provided at the request of a single Trustee.

This policy is communicated by inclusion with other policies on the Association's website.

## 7. Volunteer Management Policy

**Approved**                      **April 2018**  
**Next Review**                **May 2019**

The policy, which forms part of the Association's governance arrangements, explains the Association's volunteer policy. The policy helps define the role of volunteers and how they can expect to be treated. It is subject to annual review by the Executive Committee.

The policy has the following objectives:

- To define the role of volunteers in The Devonshire Association and to distinguish their role from that of Trustees and the Registrar;
- To ensure volunteers are treated equally and fairly;
- To allow volunteers to know where they stand, and where they can turn to for support.

### **The Devonshire Association's volunteers**

The Registrar is the sole employee of the Association. The Devonshire Association is a federal organisation with a central organising Executive Committee comprised of the Trustees, Branches located across the county and Sections which explore specific topics of interest in the county. Those actively managing the Association are not paid, other than reimbursement for out of pocket expenses. Volunteers fall into three categories:

- 1) Trustees, who sit on the Executive Committee, and direct the affairs of the Association. Trustees details are held on the Charity Commission website. The Executive Committee also organises an Annual Conference, President's Symposium, the publication of *Report and Transactions*, publishes *DA News* and manages the website.
- 2) Individuals who sit on the committees of the Association's Branches and Sections. These persons typically organise an annual programme of lectures, visits, field meetings and social and other events.
- 3) Others who, while not sitting on a committee, may take responsibility for running an event or activity, or arrange publicity, or provide other support.

This policy is intended to cover volunteers under 2) and 3) above. Trustees have well-defined responsibilities set out by the Charity Commission. Refresher training is provided periodically regarding these responsibilities.

The basis of the relationship between the Association and its volunteers is one of reasonable hopes and expectations rather than obligations. Officers are usually voted in for a period of one year at the Branch or Section AGM with the expectation that they will serve for that period.

## **Recruitment of volunteers, including equality and diversity**

The Association welcomes existing and new members becoming more involved in organising activities. Anyone aged over 18 may do so. Recruitment is typically by word of mouth at DA events. Typically, individuals do not put themselves forward and so it is necessary to approach a person and let them know their involvement would be welcomed. It is important that this is done in a way which does not discriminate in terms of equality or diversity. The Association recognises that its members have a range of talents and interests and often these can be brought to bear in a way that takes forward the Association's objectives of celebrating and exploring the county of Devon.

If any member feels such standards of behaviour are not being achieved then they should contact the Hon. Secretary in the first instance.

## **Induction**

Induction of volunteers currently takes place under the auspices of the relevant Branch and Section. Typically, this will be by taking on a role and learning over time, supported by more experienced members of the Branch or Section.

Executive Committee members or the Registrar will, upon request, attend Branch and Section committee meetings to provide advice on officer posts and succession planning.

## **Expenses**

Each Branch and Section has an Hon. Treasurer who manages the income and expenditure of that Section and reports to the Association's Hon. Treasurer annually on the financial position by 31 January each year. Such reports are verified by an independent examiner (Rule 50, Rules, 2004).

Hon. Treasurers reimburse volunteers' out of pocket expenses, against receipts, incurred in relation to the Association's activities.

## **Supervision and Support**

The Association is organised on a federal basis and supervision of volunteers is primarily undertaken by the Branch and Section Committees themselves.

Branches and Sections must operate under the Rules of the Society and in particular those numbered 48 to 59 in the Association's Rules 2004. Any rules that a Branch or Section may make for its governance shall not become operative until they have received the Executive Committee's approval (Rule 53). Guidance in this regard can be obtained from Hon. Secretary.

More general support is available in the first instance from the Registrar who can be contacted by telephone and email. The Registrar reports requests for support to the Hon. Secretary and items are escalated to the Chairman and/or Executive Committee, where appropriate.

## **Health and Safety**

Insurance cover is provided in respect of all events included in the printed Devonshire Association calendar, which is regularly updated. It is important to note that an event or activity must be added to the calendar as soon as it is planned and before the event is publicised. If the event is not included on the calendar, then no insurance cover is in place.

The Association does not undertake Disclosure and Barring Service checks as volunteers are not expected to work with children or vulnerable adults. As membership of the Association is open to the general public, and non-members may attend the Association's events, it is possible that vulnerable individuals could participate in the Association's activities. This is covered in the Vulnerable Beneficiaries policy.

## **Confidentiality and Data Protection**

The Association has a Data Privacy policy.

Volunteers in Branches and Sections may hold personal information about members. They are periodically reminded of their responsibilities to keep this secure, use only for the purpose it was provided, and to destroy it in a confidential manner, such as shredding, when it is no longer required, or is out of date.

## **Problem Solving and Complaint procedures**

As noted above, problem solving and other support is available in the first instance from the Registrar, who can be contacted by phone and email. The Registrar reports such requests to the Hon. Secretary and items are escalated to the Chairman and/or Executive Committee as appropriate.

Complaints are handled under the Association's complaints policy.

## **Consultation**

The purpose of this policy is to be helpful to volunteers. Accordingly, the policy was subject to consultation with the Association's Forum in March 2018. The Forum is the body established to strengthen links and communication between the Executive Committee and the Association's Branches and Sections.

## **Communication**

This policy will be communicated by:

- Issue to Branch and Section Hon. Secretaries;
- Inclusion on the Association's website.

## Data Privacy

Approved April 2018  
Next review May 2019

The Association's Data Privacy policy comprises this Privacy Notice and a separate privacy policy relating to the use of our website, available at <http://devonassoc.org.uk/privacy/>.

## PRIVACY NOTICE

This Privacy Notice sets out the basis upon which the Devonshire Association processes personal data. More details about the Association can be found on our website [www.devonassoc.org.uk](http://www.devonassoc.org.uk).

### Data Controller

The Devonshire Association (DA), registered charity no. 252468, is the Data Controller for the purposes of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) 2018. The Association's Registrar can be contacted at our offices, Unit 10, Chitterley Business Centre, Silverton, Exeter, EX5 4DB; Tel 01392 860456; email [devonshireassoc@btconnect.com](mailto:devonshireassoc@btconnect.com).

### Personal data held

The personal data held by the DA is obtained from the completion of forms:

- Membership application form: name, address, telephone number, email address, occupation
- Gift Aid form: name, address, signature
- Annual Conference application form: name, address, telephone number, email address
- Symposium application form: name, address, telephone number, email address
- DA Publications: name, address, telephone number, email address
- Use of the Contact the Registrar form on our website: name and email address.

### Lawful basis of processing

The Association's lawful basis of processing the personal data that it holds is two-fold:

**1. Contract.** Most of our processing is necessary to maintain the contracts that the DA has with its members. This processing consists of:

- the secure storage of data in a database and, currently, in paper form
- dealing with enquiries of all types from members
- dealing with membership payments, including applications for Gift Aid
- sending publications by post - an annual copy of *Report and Transactions*, our magazine "DA News" and a diary which sets out all our events and activities
- event bookings - the Annual Conference, the President's Symposium, the events organised by Branches and Sections to which the member is joined, and any other events that the DA may from time to time organise for its members' benefit
- communications between members of committees, including the Executive Committee

Where possible we use email for communication because of its cheapness and immediacy.

**2. Legitimate interests.** We assess we can rely on Legitimate Interests to do the itemised things but, as it is good practice to do so, we are working with our Branches & Sections to confirm this. It includes:

- sending messages to members that include content about Branches/Sections to which they are not joined
- sending messages to members that include information about events etc. that are arranged by other organisations working in the same area of interest as ourselves
- replying to enquiries from non-members by post or (where provided) by email.

### **Sharing with third parties**

The DA uses third party providers to deliver part of the services it provides. The following third parties are currently used:

- WebCollect, who are to host the membership database. Its privacy policy can be read at <https://webcollect.org.uk/help-topic/privacy-notice>
- Lloyds Bank, to process membership and other payments
- Latimer Trend, the publisher of the DA's *Report and Transactions*, who are provided with name and address labels to enable issue by post
- Brightsea, the printers of DA News, who are provided with name and address labels to enable issue by post

The DA will never sell its members' information to third parties, nor does it transfer data outside the UK.

### **Retention of and access to personal data**

Members' records are held during membership and for a period of twelve months after it ceases. Forms submitted to apply for attendance at the Annual Conference or the President's Symposium are shredded after the event has taken place. The names of those attending are held on the database. Personal data used to issue the DA's publications is held for six months after publication.

If you wish your personal data to be erased more quickly than this, you should contact the Registrar in writing. If you would like to access the information the DA holds about you (called a Subject Access Request), or to change the information held, or to cancel membership, please contact the Registrar in writing.

### **Technical and Security Measures**

Paper membership application forms are held securely at the Association's offices. The database is held on the Association's computer equipment and is backed-up. Access to the computer equipment is protected and restricted to named individuals.

Relevant member details are currently shared with a representative of each Branch and Section, and this information can be held by them either electronically or in paper form. Once the WebCollect system is in place, details will be held on one database and a representative from each Branch and Section will be able to view their own members' details, only, via that system.

**Children**

We have no members under the age of 18 and do not currently anticipate any joining.

**Breaches**

Data protection breaches will be reported by the DA to the Information Commissioner's Office in line with the requirements of that office. Should a breach occur an investigation would take place to identify the root cause and to put in steps to avoid recurrence.

**Your rights**

These include a right to object to our use of your personal data on grounds relating to your particular situation and the right to lodge a complaint with a supervisory body. If you wish to make a complaint about how the DA has processed your personal data, you may contact the Chairman of the Board of Trustees at the address above in the first instance. If you do not receive a reply within 30 days you may complain to the Information Commissioner's Office.