THE DEVONSHIRE ASSOCIATION
for the Advancement of Science, Literature and Art
A Charitable Incorporated Organisation | Registered in England No. 1209194

POLICY AND GOVERNANCE DOCUMENTS

April 2026

Conflict of Interest Policy

This 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 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. Potential and actual conflicts of interest are managed in the following way: Executive Committee members are required to notify a conflict of interest to the Executive 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 Executive Secretary.

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 subject to compliance with the Association's Privacy Policy and current GDPR guidelines.

Decisions committing the Association to expenditure above modest limits require authorisation (the expenditure limits are set and reviewed by the Executive Committee from time to time). When entering into a new financial commitment more than one quote should be obtained, unless the expenditure is under £1,000. There is no obligation on the trustees to accept the lowest tender. 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.

Risk Management Policy

This 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 to the good governance of the charity, its objectives and members 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 will endeavour to assess risks fully and act prudently to mitigate or eliminate identified risks.

The Executive Committee has responsibility for overseeing organisational risk management and in communicating its approach to risk. 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 (CC26 - Charities and Risk Management). These risks are monitored.

The Officers of the Association's Sections and Branches are encouraged to assess in advance the likelihood and the severity of possible hazards when organising and running events including talks, visits and site tours. Where possible a Risk Assessment Calculator should be implemented and the results recorded.

The Executive Committees undertakes risk workshops periodically. Risks identified relate to physical, people, premises, IT, social networking and financial integrity. Reasonable endeavours are taken to identify hazards, risks and solutions for their mitigation and these are kept under periodic review.

An open approach to mitigating identified risks is adopted by the Executive 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 Committee are brought to bear.

Complaints Handling Policy

This 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 Executive Secretary. 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 reasonable.

All expressions of dissatisfaction whether written, by phone or in person, will be reported by the Executive Secretary or Executive Committee member to the Honorary Treasurer or to a Nominated Trustee if the Honorary Treasurer is the subject of, or is associated with, the complaint. A written record will be kept. The Honorary Treasurer or nominee will be responsible for determining the response to complaints. The Honorary Treasurer or nominee will inform the Executive Committee about the complaint and action taken.

Complainants will be responded to politely. A response will be provided immediately where possible and no later than 20 working days after receipt.

Should the response not resolve the complaint, the Honorary Treasurer or nominee will escalate the complaint to a panel of three trustees appointed by the Executive Committee and a further response will be made. The panel of trustees should include the Chair or Vice Chair, but not both.

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. The written response will include reference to an arbitration service, a Regulator or to the Charity Commissioners as appropriate and as a last resort. In some circumstances, it may be appropriate to end the relationship by return of the current year's annual membership subscription.

Vulnerable Beneficiaries Policy

This 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 for vulnerable beneficiaries to 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 disabled participants 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 young person.

3. The Executive Secretary 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 the child or young person to attend meetings or events.

Pay Policy

This policy forms part of the Association's governance arrangements. The policy explains the Association's approach to paying its employees. Currently (April 2026) the Association has one paid employee, our Executive Secretary, who is contracted on a part-time basis.

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 employee's commencement of employment, currently September for the Executive Secretary.

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 Honorary Treasurer, who is the Executive Secretary's line manager, for approval by the Finance Working Group. Details of the revised salary amount should be provided by the Finance Working Group as a recommendation to the Executive Committee. The current level of pay exceeds the National Living 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.

Investment Policy

This 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 is set out in Rule 3 vi) of the CIO's Rules, 2023: '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'. In 2023 the trustees considered that a portfolio with an average value of £225,000 in a volatile market was not sustainable and the benefits were outweighed by risk. Accordingly, this could be considered to be the benchmark for the Association's investment strategy.

Should the trustees consider that the Association does not hold sufficient funds to invest in equities or other securities
The Honorary Treasurer is encouraged to ensure that cash required for day-to-day purposes is held, where possible and practicable, in interest-bearing bank accounts.

Should the trustees consider that the Association holds sufficient funds to invest in equities or other securities
The Association's long-term investments are to be invested in the stock market subject to advice received from Financial Advisers who specialise in charitable clients, appointed by the Association's trustees. Our Advisers are to be authorised and regulated by the Financial Conduct Authority or its successor in title and will be a member of, but not necessarily listed on, the London Stock Exchange. Our Financial Advisers are to provide an Advisory Managed service to the Association, recommending changes to the investment portfolio that will benefit the Association. The final decision on any and all changes rests with the Trustees. In this regard, the Executive Committee has nominated the Finance Working Group to act on their behalf, so that it is not necessary to bring all Trustees together to make a decision. The Finance Working Group is composed of at least four trustees and members of the Association, one of whom is the Honorary Treasurer. Decisions may be made by the Honorary Treasurer and no fewer than two of the other members of the Finance Working Group. As well as contact by phone and email, face-to-face meetings will take place periodically with the person in the Financial Adviser's team who is responsible for the Association's portfolio.

If actioned, 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 low level of risk. This appetite for a low level of risk is considered appropriate in view of the intended long-term nature of our investments.

Instructions will be given to our Financial Adviser 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.

The Trustees require the Financial Adviser to provide written statements of portfolio performance at least twice per year. Investment performance will be 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.

Volunteer Management Policy

This 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 Executive Secretary;
- 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 Executive Secretary 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 and finance of the Association. Trustees' details are held on the Charity Commission website. The Executive Committee also organises an Annual Conference and President's Symposium; publishes an annual volume of Report and Transactions as well as *DA News,* and manages the Association's 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.

Recruitment of volunteers, including equality and diversity

The Association welcomes existing and new members becoming more involved in organising activities. Anyone aged 18 or over may participate as a volunteer. 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 diverse range of talents and interests which can be applied to take 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 Executive Secretary in the first instance.

Induction

Induction of volunteers 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 Executive Secretary will, upon request, attend Branch and Section Committees to provide advice on officer posts and committee succession.

Expenses

Each Branch and Section has a Treasurer who manages the income and expenditure of that Branch or Section and reports to the Association's Honorary Treasurer annually on the financial position by 14 February each year. Such reports must be verified by two persons from within the Branch or Section OR one person from the Branch or Section and one person from the wider membership of the Association, who may or may not be an independent examiner.

Branch and Section Treasurers have the authority to reimburse volunteers' out of pocket expenses, against receipts, incurred in relation to the Association's activities. All such out of pocket expenses should be previously agreed in writing by the Branch or Section Chair, or by the Treasurer if the Chair is the intended recipient of the payment.

Insurance

The Association purchases annual insurance policies deemed by the trustees to be appropriate for the activities undertaken, the reasonable actions of our volunteers and our liability to the public. Insurance documentation is available for consultation on request to either the Honorary Treasurer or to the Executive Secretary.

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 49 to 60 in the CIO's Rules 2023. 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 54). Guidance in this regard can be obtained from the Executive Secretary.

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

Data Privacy

The Association's Data Privacy policy comprises this Privacy Notice and a separate privacy policy relating to the use of our website, available at https://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.

Data Controller
The Devonshire Association (DA), registered as a Charitable Incorporated Organisation no. 1209194, is the Data Controller for the purposes of the General Data Protection Regulation (GDPR) 2018. The Association's Executive Secretary can be contacted at our offices, Unit 10, Chitterley Business Centre, Silverton, Exeter, EX5 4DB; Tel 07742 148865; email exec.sec@devonassoc.org.uk.

Personal data held
The personal data held by the DA is obtained from the completion of forms (paper or electronic):

- 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 Executive Secretary form on our website: name and email address
- Registration for discussion forums on our website: chosen username 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 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 event programmes sent by Branches and Sections to which the member is joined.
- event bookings - the Annual Conference, the President's Symposium, the events organised by Branches and Sections which the member has elected to join, 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.

2. Legitimate interests. We rely on our legitimate interests to do the following:

- sending messages to members that include content about Branches/Sections which they have *not* elected to join
- sending messages to members that include information about events etc. that are arranged by other organisations that share similar interests and objectives as the DA and its members
- 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. The list is not intended to be comprehensive and other providers may, from time to time, be engaged for a specific purpose.

- WebCollect – hosts our membership database**.** Its privacy policy can be read at https://webcollect.org.uk/help-topic/privacy-notice
- GoCardless – processes direct debit payments for WebCollect
- Banks – process payments made to the DA, its Branches and Sections
- The publisher of the DA's *Report and Transactions* – provided with name and address labels to enable issue by post
- The printers and distributors of DA News – provided with name and address labels to enable issue by post
- Our website hosting platform – holds contact details for selected members of the Association

The DA will never sell, rent, lease or give away its members' information to third parties, nor does it knowingly 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 destroyed not more than 30 days 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 a member or enquirer wishes their personal data to be erased more quickly than this, they are informed to contact the Executive Secretary in writing. If the member would like to access the information the DA holds about them (called a Subject Access Request), or to change the information held, or to cancel membership, they should contact the Executive Secretary in writing.

Technical and security measures

Paper membership application forms are held securely at the Association's offices. Any personal data held on the Association's computer equipment is securely backed-up and 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.

Children
We treat the personal data of anyone under 18 years old to the same high standard of privacy as the rest of our membership. No special provisions are necessary under GDPR since we do not rely on consent to process personal data.

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.

The following statement is made available to our members on the DA website.

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 Chair 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.

Refund Policy

The principle of having a published Refund Policy is to protect the Association against potential financial losses caused by last-minute cancellations. The most obvious reason for incurring a loss will be events with catering where head-count has to be provided to the caterer several days before the event, or at venues where a *per capita* fee is applied to cover venue hire, tea, coffee, AV *etc*.

Organisers have the option not to apply the Refund Policy if there is no associated cost, but in cases where there is an associated cost it must be applied fairly and consistently.

- Cancellations received by the Organiser two weeks or more before the event start date, a full refund will apply.
- Cancellations received by the Organiser one week before the event start date, a 50% refund will apply.
- No refund will normally be offered for cancellations received within one week of the start of the event.

The Refund Policy is not intended to be mandatory. When it is to be applied the Terms and Conditions for the event must state that the DA's Refund Policy will be implemented.

This policy should be reviewed by the Association's trustees at least every three years.

Equality, Diversity and Inclusivity Policy

Introduction

This policy forms part of the Association's governance arrangements. The policy explains the Association's approach to equality, diversity and inclusivity issues 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, the trustees are aware of the need to address issues as they arise, in order to fulfil their obligations under the Equality Act 2010.

The Devonshire Association (DA) strives to ensure that all members, volunteers, employees and potential members, volunteers and employees are treated fairly and with respect whilst appreciating individual differences. The DA opposes discrimination or harassment including, but not limited to, the grounds of age, disability, appearance, gender, race, ethnicity, religion and belief, sex and sexual orientation. These characteristics are protected under the Equality Act 2010.

Inclusivity is understood to mean “enabling a diverse and inclusive professional membership”.

Policy objective

We want everyone who joins or comes into contact with the DA to feel that they have been treated fairly and we therefore require everyone who works or volunteers for the DA to comply with this policy.

This policy is intended to guide operational decisions taken by the trustees, staff and volunteers either individually or working in partnership.

Governance

The DA will ensure that there is a named EDI Liaison on the Executive Committee. Training will be offered to all trustees, staff and volunteers from time to time.

Scope of the policy

The following behaviours are intended to illustrate the scope of the policy, but this list is not exhaustive:

> **Discrimination:** where an individual is treated less favourably on the basis of any of the discriminatory grounds included above. Further, where an action or decision is applied equally to all individuals but has a disproportionately adverse effect, whether intended or not, on one particular group of individuals.
>
> **Harassment:** where a member is subjected to unwelcome physical or verbal conduct or less favourable treatment on any of the discriminatory grounds included above. This includes aggressive conduct and bullying. It also includes:

Verbal abuse: this may include unwelcome advances, lewd comments, propositions or remarks, inappropriate jokes, banter or abusive language;

Digital bullying: this may include hostile emails and the inappropriate use of or direction to websites and computer networks;

Unwanted physical contact: this may include unnecessary touching, patting, pinching or inappropriate close contact. It also may include insulting or abusive behaviour, gestures, threats, assault, coercion and unwanted non-verbal contact.

Victimisation: where someone is treated less favourably than others because that person has made a complaint or taken action against any employee, trustee or volunteer of the DA.

Disability: is defined as a physical or mental impairment which might, or might not, be evident to another individual but which has a substantial and long-term effect on a person's ability to carry out normal day to day activities. The Executive Committee will consult and make sure that necessary adjustments are made for members, volunteers and employees who have or develop a disability to enable them to be comfortable and effective in the work they carry out for the DA. The trustees will also endeavour to ensure that the benefits of membership are, where possible, accessible to all members. The trustees are aware of their obligations under the Disability Discrimination Act, 1995.

Breach of the policy

Any alleged breach of this policy should be raised with the named Liaison on the Executive Committee or with the Vice Chair in the event that the Liaison is directly involved. A report with remedial action should be presented to the Executive Committee at the earliest opportunity.

Commitment

The DA trustees will make sure that any decisions on training, development and promotion are based on merit and on objective evidence which can be substantiated. The DA trustees will also ensure that its governance and policies are regularly reviewed and amended as necessary so as to ensure fairness and compliance with current legislation.