

Shared Interest Volunteer Policy

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Our commitment to volunteering

Shared Interest has a proud history of involving volunteers in support of our mission of providing financial services and business support to make livelihoods and living standards better for people as they trade their way out of poverty. We want people who volunteer with us to feel inspired and encouraged in their roles and we endeavour to show how your involvement supports our mission. Our relationship is one of mutual benefit.

Shared Interest's Volunteer Policy sets out the relationship between Shared Interest and our volunteers to give you an enjoyable and productive experience as a volunteer. It helps ensure your contributions are meaningful, that your health and safety are of paramount importance and it enables us to work together in ways that ensure consistency and accuracy to protect our identity and reputation. You should read this Volunteer Policy in collaboration with our Volunteer Handbook and other guidance provided relevant to your role.

Shared Interest volunteers are never a substitute for paid staff, but rather provide added value to the way that we work and are a valued part of our relationship with stakeholders and the general public. Volunteers support Shared Interest by giving their time to carry out roles which have been initiated by, or agreed with, the organisation. The volunteering relationship is based on trust and this policy is not a contract of employment and should not be considered as such and is not binding by either side.

Values and Positive statements

We act in a manner that reflects our values of love, justice and stewardship. Our positive statements shape how we approach our roles and the work we do.

Be Fair – We invest in a fairer world. We believe in treating people consistently and making measured judgements – whether it is with each other, or with a customer, investor, donor, volunteer, supplier or member of staff.

Be Responsible – We lend responsibly; we inform our investors of risk, and we do our best with the resources that are entrusted to us. We consider the impact of our actions on the environment and community, as well as each other.

Be Positive – We see the world as it could be. We aim to see the best in people and work together to achieve positive solutions in all that we do.

Be Innovative – We work collaboratively and professionally. This means we share knowledge and skills to attain the best outcome possible. We celebrate the diversity of different cultures. We listen, and value others' opinions, use experience to inform our decisions, and encourage new ideas.

We expect our volunteers to act in accordance with these positive statements while volunteering with us. To support this we ask volunteers to follow the guidance and advice given within this code.

Being Fair

Volunteer Recruitment

Shared Interest welcomes volunteer applications from all members of the community. We know that you are motivated by a variety of factors and we respect and welcome the diversity this brings to our volunteer network.

The recruitment journey for a volunteer will vary depending on the role being applied for. However, all volunteer recruitment will include the opportunity for an informal chat to ensure a good match with the potential volunteer, the role and Shared Interest. Where successful, we will then invite applicants to complete a registration form to collect relevant information including some personal details. For some roles a volunteer might be invited to complete an introductory period or task, if this is necessary, it will be discussed during the enquiry or application stage.

Recruitment of volunteers will take into consideration the ability to fulfil the role concerned and commitment to the expectations of the role. It is Shared Interest's policy to recruit volunteers with the right skills, knowledge, experience and passion for our volunteer roles. Volunteer recruitment will respect and follow Shared Interest's Diversity and Equal Opportunities Policy for Volunteers (see Appendices). An application to volunteer does not guarantee a volunteer role. All volunteers with Shared Interest must be 18 years of age or over. We have no upper age limit for volunteers although we encourage you to be aware of, and communicate to us, your own abilities and capacity to carry out your role (see also 'Health and Safety' and 'Inactive volunteers' sections).

Expenses

You will be reimbursed for any reasonable out of pocket expenses that you may wish to claim and which have been paid by you to enable you to carry out your volunteering. You can decide whether you wish to claim expenses and we reserve the right to decide whether a claim is appropriate, if you are unsure please ask your staff contact before making any payment. All expense claims should be completed in a timely manner following each activity. Tickets and receipts must be provided and attached to a completed expenses claim form, available from your staff contact or the Volunteer Engagement Manager.

If you are attending an event which has a fee, for example a stall fee, please discuss this with your staff contact in advance of making any payment or expenses claim. Any stall fees will be paid by Shared Interest once attendance has been agreed.

Volunteers are asked to consider the most environmentally friendly way of travel when planning their journeys. We encourage volunteers to travel to by public transport and minimise the use of their own car where possible when carrying out their role. We monitor the carbon emissions of staff and volunteers traveling and use this to calculate our carbon offset fund.

Where you do need to use your own vehicle, we do not provide motor insurance. It is your responsibility to check and, if necessary, arrange with your insurer, any cover for travel in your vehicle while volunteering with us. Where we have agreed to reimburse expenses for travel in a personal vehicle these will be paid at a rate of 45p per mile, unless otherwise advised.

You must never accept cash as an investment, or cheques other than those payable to Shared Interest. Any fees or donations offered to you should be donated to Shared Interest Foundation

by the person offering this. Please also see policies and guidance around handling cash if this is relevant to your role.

You may find some organisations are unable to make donations to another charity. Where this is the case, and a donation is made via you in a personal capacity, you must disclose this to the Volunteer Engagement Manager as soon as is possible so we can thank the donor accordingly. You should also forward the donation by the most convenient means possible in a timely manner (cheque by post or bank transfer). We expect that you will not accept expense payments from hosts. If you are offered these please invite the host to contribute this as a donation to Shared Interest Foundation. If you wish to claim expenses please do so by making a claim to Shared Interest.

Inactive and Leaver volunteers

At any point during your involvement as a volunteer you may need to take a period of time out from your role. We ask that you let us know if this arises so that arrangements for your period of inactivity can be made.

You may also reach the decision to leave your volunteer role at any time and all we ask is that you let us know of this decision.

References

Upon request, we can provide references for current volunteers or those who have left their volunteer role less than 12 months prior to the request. It is Shared Interest's policy to confirm only dates and volunteer role(s) carried out with us. We do not provide substantive or subjective references and this should not be seen as a reflection on the volunteer or as a comment on their suitability for the position, they are applying for. All reference requests are handled by Shared Interest's Head of HR .

Dealing with difficulties

There may be occasions or situations where you experience difficulty in your role. If this occurs, you should speak to your staff contact as soon as possible for advice and support. They will do their best to resolve the problem.

Most routine problems are best resolved informally in discussion between the parties involved. If the problem cannot be resolved informally, the formal problem resolution procedure may be followed. However, if the issues or areas of concern cannot be resolved after a more formal discussion, our volunteering relationship may have to end.

Problem resolution procedure

Shared Interest takes very seriously any complaint by or against any of its stakeholders including you, our volunteers. Although dealing with complaints can be difficult, it can give us a positive opportunity to improve the way we do things. Any complaint will be dealt with swiftly and may follow the procedure outlined below.

Stage 1 – Oral complaint

The initial complaint will be discussed to establish the facts. If the complaint is about the Volunteer Engagement Manager, then refer the matter to another manager. A nominated

person of your choice from within the organisation can accompany you. If the issue cannot be resolved at this stage then a formal complaint should be made in writing to a member of the Senior Management Team.

Stage 2 – Written complaint

The complaint should be made within a month of the oral complaint. The organisation will respond within two weeks of receipt of the written complaint.

Stage 3 – Right to appeal

Appeals should be made to a member of the Senior Management Team. A nominated person of your choice from within the organisation can accompany you at an appeal meeting. The chair or subcommittee responsible at the appeal must respond within two weeks and their decision is final.

Being Responsible

Orientation, Induction and Training

Following agreed confirmation of a volunteering role; we will provide you with orientation and induction training relevant to the role. The orientation is a self-led activity requiring online access, although accommodations can be made where online access is difficult. We aim to provide induction training in person, although there may be occasions where this is carried out via online means such as webinar. Induction training may take place with other volunteers or individually.

Prior to induction training you may be asked to complete a pre-training exercise, role dependant.

During the induction training session you will be introduced to your role, briefed on, and issued with, the resources available to you for your role and provided with guidance on getting started in your new role. The training will also cover next steps and how we will support and keep in touch with you.

Your role may involve further training as you or Shared Interest see fit. This will be arranged with you as necessary and you will be expected to complete any training required to fulfil your role.

Reliability and Conduct

It is important for us to have reliable volunteers. There is no guarantee that any volunteer will be given a specific amount of activity to carry out but we expect that if you make a commitment to volunteer that this is fulfilled. Where this is not possible, please let your staff contact know as soon as possible to allow alternative arrangements to be made.

We expect you to act responsibly and within the law. Volunteering whilst under the influence of alcohol or drugs will not be accepted. As a volunteer for Shared Interest, you are representing the organisation and as such have a responsibility to do so appropriately and positively.

We ask that you dress in a manner that shows consideration to the public and your colleagues and in a manner suitable for the role and environment in which it is being carried out. Clothing

must be free from political motifs or slogans and not provocative or revealing. To help you we have branded name badges available if relevant for your role.

Where your role involves engaging with other stakeholders such as members, donors, customers, beneficiaries or the general public, we expect you to be mindful of difference and to interact politely and respectfully with them.

During your recruitment you will have been asked to sign a copy of our Code of Conduct. This sets out our expectations of **all** of our stakeholders with regards to behaviour and conduct around children and adults at risk. See also Appendix 5. Safeguarding Vulnerable Adults and Children Policy.

If there are any issues or concerns regarding conduct or how you represent Shared Interest through your role, this will be made known to you by your staff contact or the Volunteer Engagement Manager, who will have an informal discussion to try to correct the situation in the first instance. If the issue is not resolved, the problem resolution procedure may be followed. In some instances, issues or concerns may result in the immediate ending of the volunteering relationship.

Health and Safety

We are committed to looking after the health and safety of everyone who works and volunteers for us. Please see our Health and Safety Statement for Volunteers (see Appendices) for details of expectations regarding your health and safety.

We want everyone volunteering with us to feel comfortable and safe when carrying out their roles. We are aware that circumstances beyond anyone's control, such as the COVID-19 pandemic, will affect everyone differently and you will know your individual situation best. In the event of future local, national or international incidents we expect you to follow government guidance issues for your area. We encourage you to consider government and public health guidance when travelling to and attending face to face events and any volunteering activity which takes place outside of your home. In the interest of your well-being, we also encourage you to be aware of our Personal Safety and Lone Working Guidance for Volunteers and Lifting and Manual Handling Guidelines for Volunteers. Where copies of these have not been provided to you as part of your induction training you can request these from your staff contact or the Volunteer Engagement Team.

Please let your staff contact know of any personal health and safety requirements that you may have in order to carry out your role safely and provide us with an emergency contact for yourself. It is your responsibility to update us of any changes to your health, which may affect your volunteering. It is also your responsibility to inform us of any changes to the details of your emergency contact which you provide.

Whilst you are engaged in an agreed volunteering task, activity or event with Shared Interest you are covered under Shared Interest's Employers Liability insurance. If we have not agreed the task, activity or event with you in advance you will not be covered under this insurance. If you are asked to provide evidence of this insurance cover for events, please ask the Volunteer Engagement Team. Please note – under our Employers Liability insurance any person over the age of 75 is **not** covered for permanent total disablement whilst travelling.

Where your volunteer role involves you visiting a school or other setting where you may come into contact with vulnerable individuals we expect that you will never be left alone as the sole responsible person. We expect that if you are visiting or attending such a location in your capacity as a volunteer with us that you discuss this with your staff contact well in advance so we can be sure the host(s) are aware of their responsibilities to you and Shared Interest for the duration of this visit. We also expect you to refer to our 'Guidance for visiting schools' when visiting a school or similar setting.

General Data Protection Regulation

We take great care to protect the information we store about you as part of our data protection responsibilities. By completing and signing a volunteer registration form, you are consenting to Shared Interest processing your personal data in accordance with the General Data Protection Regulation. Details of handling of personal data can be found in our Terms and Conditions <http://www.shared-interest.com/about-us/terms-and-conditions/> and Data Privacy Notice for Volunteers.

We expect you to process and protect any personal data you use or come into contact with in your role in accordance with GDPR and Shared Interest's guidance around this. This includes confidential information about individuals and the organisation, including details of investment or donations. If you are ever given a completed enquiry or application form containing an individual's data you must pass these directly to Shared Interest in the most appropriate manner (post or in person) and you must not make any copy of the details. We will not share details of individual's investments or donations or information which could be used to identify any individuals investment or donation.

Being Positive

Communications and Brand

Our volunteers play an important part in communicating the Shared Interest brand. For consistency, we hope you can help us ensure information about our organisation is accurate and well presented. To make things easier, we have a library of resources available for you to use which will be shown to you during your induction training.

Please refer all media enquiries to our Communication team by emailing comms@shared-interest.com.

For those volunteers who use social media, you can read our Twitter Policy on our website. We like to use photos from events online, in our volunteer newsletter, and other publications. If you do share a photo with us, please ensure you have permission from the people featured in it (See GDPR toolkit for guidance).

Being Innovative

Support and Supervision

You will be directly supported by your named staff contact. This may be a member of the Volunteer Engagement Team or another member of staff but, you will always receive support and communications from the Volunteer Engagement Team.

You will receive an invitation three months after your induction training to discuss your experiences so far. We offer a similar opportunity on an annual basis to discuss your expectations, activity, answer any questions and provide relevant updates. Timings of these catch ups may vary depending on the time commitment involved in your role and this will be communicated to you.

You will also receive regular general communications from Shared Interest, as appropriate to your role. This may include; a volunteer e-newsletter, online and in person meet up opportunities with other volunteers to keep you up to date with Shared Interest and the wider volunteer network. You will also have support from your staff contact regarding issues relevant to your role and individual activity.

We ask that you maintain regular communication with your staff contact and / or the Volunteer Engagement Manager to let us know of any planned activity and of any issues you may be experiencing in your volunteer role (see 'Inactive volunteers' section).

During your registration, you will be asked about any personal health and safety requirements you have in order to carry out your role safely and provide us with an emergency contact for yourself. It is your responsibility to decide what information you share with us. It is also your responsibility to update us of any changes to your health that may affect your volunteering and emergency contact details held by Shared Interest (see Data Privacy Notice for Volunteers).

Further Information

This Volunteer Policy has been prepared by the Volunteer Engagement Manager, reviewed and approved by the Senior Management team of Shared Interest. Any queries or suggestions about its content should be referred to the Volunteer Engagement Manager.

This Volunteer Policy outlines our expectations of volunteers and the management of our volunteering relationship. It is not intended to create a contract or legal relations.

Last reviewed: June 2021

Next review due: June 2022

If you would like further information, support or advice about volunteering with Shared Interest please ask your staff contact or the Volunteer Engagement Team.

Shared Interest
Pearl Assurance House, 5th Floor
7 New Bridge Street West
Newcastle-Upon-Tyne
NE1 8AQ
Tel: 0191 233 9103
Email: volunteers@shared-interest.com

Web: www.shared-interest.com/getinvolved

Shared Interest recognises and values the contributions of all our volunteers and the role they play in supporting and promoting the organisation.

The following documents are applicable to volunteers in the roles we offer. Please familiarise yourself with those relevant for you and your role. They will have been issued during your Induction Training but, if you have not received any which you think are relevant for your role, please ask your staff contact or the Volunteer Engagement Manager

- **Personal safety and lone working guidance - Volunteers**
- **Lifting and Manual Handling Guidelines – Volunteers**
- **Tips for Computer based working – Volunteers**
- **General Data Protection Regulation – Volunteer Guidance**
- **Guidance for visiting schools**

Appendix 1 – Diversity and Equal Opportunities Policy – Volunteers

We believe that, whilst we are all individuals, we should be all be treated and valued with dignity and respect. We are therefore committed to the development of procedures to promote equal opportunities in employment, personnel practices, and services for which we are responsible.

Shared Interest is committed to equal opportunities, and embraces diversity by reflecting the population of the appropriate local community wherever possible.

Diversity is about recognising, valuing and taking account of people’s different backgrounds, knowledge, skills and experiences, and encouraging and using those differences to create a productive and effective workforce.

In particular, we aim to ensure that all decisions about volunteering and training are objective, related to individual personal development, and supportive of business needs and help to ensure that people regardless of their background can contribute to their full potential.

In respect of customers, members and other stakeholders, including volunteers, we will aim to:

- Ensure that relevant criteria and procedures are applied fairly and without bias
- Conduct our business sensitively and flexibly, giving consideration to cultural and other diversity issues.

Shared Interest has a legal and moral responsibility to ensure that Shared Interest and its volunteers do not discriminate on the grounds of gender, disability or ill-health, marital status, race, colour, ethnic or national origins, sexual orientation, age, religion, or Trade Union membership.

Any volunteer who is found to be in breach of this will be subject to Shared Interest's Volunteer problem resolving procedure (see Volunteer Policy), and may be held personally liable for discriminatory acts in a court of law.

Responsibilities

Although the responsibility for achieving and providing diversity and equality of opportunity rests with the Management Team, volunteers at every level have a responsibility to own and promote the policy:

Title	Responsibility
Board	To agree the policy statement and monitor any legal and/or compliance issues
Managing Director	To lead the development of a diverse culture with equal opportunities for all
Management Team	To ensure that all employees and volunteers are aware of the policy and adhere to its principles. To keep up to date with changes in legislation and implement appropriate changes to policy. To monitor the impact of the diversity and equal opportunities policy and make improvements as appropriate. To ensure that the policy is regularly reviewed.

	<p>To ensure that the policy is properly implemented.</p> <p>To ensure that grievances are dealt with in a fair and consistent manner.</p>
Volunteers	To take personal responsibility for implementing diversity and equal opportunities in their activities.

Procedures

- If you are disabled, or become disabled during the course of your volunteering with Shared Interest, we will discuss and agree with you all reasonable steps which could be taken to accommodate your individual needs
- If you have a particular religious or cultural need that might conflict with your volunteering, we will discuss and agree with you all reasonable steps which could be taken to meet your individual needs
- If you are not satisfied with the outcome of the discussions with your staff contact, you should follow the process laid down in the Volunteer Policy.

Appendix 2 – Health and Safety Policy Statement – Volunteers

Shared Interest has a statutory duty to ensure, as far as is reasonably practicable, the physical and mental health, safety and welfare at work of all our employees, volunteers, contractors and visitors.

Shared Interest is responsible for:

- Providing and maintaining systems that are safe and without risks to health.
- Maintaining any location under our control in a condition that is safe and without risks to health, including safe access and exit.
- Ensuring the safe use, handling, storage and transport of articles required.
- Providing such information, training and supervision as is necessary to ensure the health and safety of our employees, volunteers, contractors and visitors.
- Continually reviewing our Health and Safety and related policies and arrangements.

You are responsible for:

- Observing Shared Interest's Health and Safety and related policies and arrangements.
- Taking all reasonable care for your own health and safety and that of others who may be affected by your actions, including applying venue specific procedures such as fire safety.
- Co-operating as far as is necessary to ensure that any duty or requirement statutorily imposed on Shared Interest is complied with.
- Understanding that failure to comply with Health and Safety requirements may lead to further action by Shared Interest and prosecution by the Health and Safety Executive.
- Notifying your staff contact of any matters that affect Health and Safety during your time volunteering for Shared Interest.

General responsibilities

This section outlines the broad responsibilities, which apply to all staff and to certain groups of staff and named individuals. Specific responsibilities may need to be reallocated from time to time.

Role within organisation	Area of responsibility
Board	Legal responsibility to ensure there is a Health & Safety Policy Statement ('The Policy') and monitor compliance.
Directors Patricia Alexander Tim Morgan	Responsible for endorsing and implementing the Health & Safety Policy through other Shared Interest policies and practices, line management and by example. Responsible for bringing changes in legislation to the Directors' attention and for monitoring compliance issues. Ensures that all necessary insurances, certificates etc. are obtained and kept up-to-date.
Managing Director Patricia Alexander	Responsible for the Health & Safety Policy, ensuring that it is reviewed and revised on an annual basis, or as and when there are any major changes during the course of the year.
Head of HR Margaret Woodhouse	Overall responsibility for Health & Safety matters. Responsible for bringing changes in legislation to the Directors'/Board attention. Liaises with Company Secretary to ensure that all necessary insurances, certificates etc. are obtained and kept up-to-date. Reports appropriate incidents to insurers.

<p>Executive Administrator Denise Sumner</p>	<p>Is a member of the Health & Safety Committee</p> <p>Works with the Head of HR to ensure that safe systems of work, training, reviews and revisions are carried out.</p> <p>Works with the Head of HR to ensure that First Aiders and Fire Wardens are appointed in line with current guidelines.</p> <p>Works with the Head of HR to ensure that Health & Safety training is carried out and recorded according to the agreed programme.</p>
<p>All volunteers</p>	<p>Responsible for co-operating with their staff contact to ensure safe operating environments at all times, reporting any hazards as soon as possible.</p> <p>Taking reasonable care of themselves and others who may be affected by what they do and don't do while volunteering.</p> <p>Using all items provided by Shared Interest correctly, in line with training and instructions.</p> <p>Informing those in Shared Interest responsible for Health & Safety of any situation which might be seriously or imminently dangerous</p> <p>Informing those responsible of any potential hazards, even when no immediate danger exists, so that appropriate remedial action can be taken.</p>

Appendix 3 – Data Privacy Notice for Volunteers of Shared Interest Society and Shared Interest Foundation

1. INTRODUCTION

- 1.1 Shared Interest Society AND Shared Interest Foundation (or “SI”) is committed to protecting the privacy and security of your personal information.
- 1.2 This privacy notice describes how we collect and use personal information about you during and after your volunteering role with us, in accordance with the General Data Protection Regulation (GDPR).
- 1.3 It applies to all volunteers.
- 1.4 SI is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.
- 1.5 This notice applies to active, inactive and former volunteers. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.
- 1.6 It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. DATA PROTECTION PRINCIPLES

- 2.1 We will comply with data protection law. This says that the personal information we hold about you must be:
 - 2.1.1 Used lawfully, fairly and in a transparent way.
 - 2.1.2 Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - 2.1.3 Relevant to the purposes we have told you about and limited only to those purposes.
 - 2.1.4 Accurate and kept up to date.
 - 2.1.5 Kept only as long as necessary for the purposes we have told you about.
 - 2.1.6 Kept securely.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 3.2 There are “special categories” of more sensitive personal data which require a higher level of protection.
- 3.3 We may collect, store, and use the following categories of personal information about you:

- 3.3.1 Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
 - 3.3.2 Date of birth.
 - 3.3.3 Gender.
 - 3.3.4 Next of kin and emergency contact information.
 - 3.3.5 Bank account details.
 - 3.3.6 Out of pocket expenses information.
 - 3.3.7 Start date.
 - 3.3.8 Location of workplace.
 - 3.3.9 Volunteer appointment information (including references (where relevant and other information or cover letter or as part of the volunteer application process).
 - 3.3.10 Records (including job titles, work/voluntary history, working/volunteering hours and training records.
 - 3.3.11 Performance information.
 - 3.3.12 Information about your use of our information and communications systems.
 - 3.3.13 Photographs.
- 3.4 We may also collect, store and use the following “special categories” of more sensitive personal information if you disclose it to us. Information about your religious beliefs, and health.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

- 4.1 We typically collect personal information about volunteers through the appointment process, directly from volunteers who apply via an enquiry form on the SI website, by direct request or at an event.
- 4.2 We will collect additional personal information in the course of job-related activities throughout the period of you volunteering for us.

5. HOW WE WILL USE INFORMATION ABOUT YOU

- 5.1 We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:
 - 5.1.1 Where we need to comply with a legal obligation.
 - 5.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 5.2 We may also use your personal information in the following situations, which are likely to be rare:
 - 5.2.1 Where we need to protect your interests (or someone else’s interests).

5.2.2 Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

5.3 We need all the categories of information in the list above (see the kind of information we hold about you) primarily to allow us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

5.4 Making a decision about your recruitment or appointment.

5.4.1 Determining the terms on which you volunteer for us.

5.4.2 Paying your expenses.

5.4.3 Business management and planning, including accounting and auditing.

5.4.4 Conducting reviews, managing performance and determining performance requirements.

5.4.5 Assessing suitability for a particular job or task.

5.4.6 Making decisions about your continued volunteering.

5.4.7 Making arrangements for the termination of our voluntary relationship.

5.4.8 Education, induction and ongoing training and development requirements (including shadowing other volunteers).

5.4.9 Dealing with legal disputes involving you, other volunteers, employees, workers and contractors, including accidents.

5.4.10 Ascertaining your fitness to volunteer.

5.4.11 Complying with health and safety obligations.

5.4.12 To prevent fraud.

5.4.13 To monitor your use of our information and communication systems to ensure compliance with our IT policies.

5.4.14 To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

5.4.15 To conduct data analytics studies to review and better understand retention and attrition rates.

5.4.16 Equal opportunities monitoring.

5.5 Some of the above grounds for processing will overlap and there may be several grounds, which justify our use of your personal information.

If you fail to provide personal information

- 5.6 If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our other volunteers, employees and workers).

Change of purpose

- 5.7 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so.
- 5.8 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

- 6.1 "Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:
- 6.1.1 In limited circumstances, with your explicit written consent.
 - 6.1.2 Where we need to carry out our legal obligations and in line with our Data Protection Policy.
 - 6.1.3 Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our Data Protection Policy.
 - 6.1.4 Where it is needed to assess your volunteering capacity on health grounds, subject to appropriate confidentiality safeguards.
- 6.2 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations

- 6.3 We will use your particularly sensitive personal information in the following way:
- 6.3.1 We will use information about your physical health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to volunteer.

Do we need your consent?

- 6.4 We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

7. INFORMATION ABOUT CRIMINAL CONVICTIONS

- 7.1 We do not envisage that we will hold information about criminal convictions.

8. AUTOMATED DECISION-MAKING

- 8.1 We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

9. DATA SHARING

- 9.1 We may have to share your data with third parties, including third-party service providers and other entities in the group.
- 9.2 We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the voluntary relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: IT services only.

How secure is my information with third-party service providers and other entities in our group?

- 9.3 All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We don't share your personal information in this way.

What about other third parties?

- 9.4 We only share your personal information with a regulator or to otherwise comply with a legal obligation.

Transferring information outside the EU

- 9.5 We do not transfer the personal information we collect about you outside the EEA and will notify you in writing if this position changes.

10. DATA SECURITY

- 10.1 We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- 10.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 10.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 10.4 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. DATA RETENTION

How long will you use my information for?

- 11.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 11.2 In most cases, we delete volunteer records 12 months after the volunteer has ceased their arrangement with us. This is an automated process.
- 11.3 In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a volunteer of the company we will retain and securely destroy your personal information in accordance with our Privacy Policy.

12. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

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

Your rights in connection with personal information

- 12.2 Under certain circumstances, by law you have the right to:
 - 12.2.1 **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- 12.2.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - 12.2.3 **Request the erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation, which makes you want to object to processing on this ground.
 - 12.2.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - 12.2.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - 12.2.6 **Request the transfer** of your personal information to another party.
- 12.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Company Secretary in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

- 12.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. RIGHT TO WITHDRAW CONSENT

- 13.1 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Company Secretary. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

14. COMPANY SECRETARY

- 14.1 We have appointed the Company Secretary to oversee compliance with this privacy notice. If you have any questions about this Privacy Notice or how we handle your personal

information, please contact the Company Secretary. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

15. CHANGES TO THIS PRIVACY NOTICE

- 15.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.
- 15.2 If you have any questions about this privacy notice, please contact the Company Secretary at Companysecretary@shared-interest.com or by telephone on 0191 2339100.

Appendix 4 – Anti-Corruption and Fraud Policy – Volunteers

- ‘Fraud’ is considered to be any intentional distortion of financial and other records, and the misappropriation of assets
- ‘Bribery’ is the offering, giving, soliciting or accepting of any improper inducement or reward
- ‘Corruption’ is the abuse of entrusted power for private gain (see examples below) and includes bribery

The Society is determined to protect itself and its members from fraud and corruption and is committed to the rigorous maintenance of a strategy for the prevention and detection of fraud and corruption. The Society's Anti-Corruption and Fraud Strategy is based on a 3 related elements designed to prevent any fraudulent or corrupt act, namely:

1. The way we work

The culture and tone of the Society should meet the expectations of: ‘objectivity, openness, leadership, accountability, honesty, selflessness and integrity’ (Nolan 1996, Appendix 1). The Society requires all individuals and organisations with whom it deals in any capacity to behave towards the Society with integrity and without intent or actions involving fraud or corruption.

Society employees and representatives are important in combatting fraud and corruption and are positively encouraged to raise any concerns they may have on these issues which impact on Society activities. In most cases, issues should be referred to an Executive Director (unless he/she is implicated in the fraud/corruption, in which case the Chair of the Board should be contacted).

2. Deterring and preventing fraud and corruption

Representatives of the Society should exercise their common sense and discretion in applying the policy to their specific role with the Society

Gifts or Hospitality

The basic guidelines here are to use common sense, with specific sensitivity to any cultural/behavioural requirements (e.g., in certain cultures, it might be considered rude to reject a gift). If in doubt, the situation should be discussed with the Managing Director (or Chair of the Board if the MD is involved). Where it is not possible to contact the Managing Director (lack of phone contact, too obvious/rude to do so), a gift may be accepted as long as the MD is told immediately afterwards.

Fees and commissions

Where you are offered a fee, for example, for delivering a presentation, this should be passed on to Shared Interest Foundation as a donation.

3. Investigation Procedures

The Society will deal thoroughly, but as quickly as possible with any person who attempts to defraud the Society or who engages in corrupt practices.

Where there are reasonable grounds for believing that a criminal offence has been committed, the matter will be reported to the police, or other relevant authority, by the Finance Director/appropriate person.

Appendix 5 - Safeguarding Vulnerable Adults and Children Policy

1 INTRODUCTION

Shared Interest provides financial services and training to disadvantaged communities throughout the world. It is the responsibility of all of us to prevent the physical, sexual, emotional abuse or neglect of every member of our community and particularly the abuse of those most vulnerable among us, including children, young people and adults at risk. This policy seeks to ensure the welfare and protection of those who access services provided by our organisation. The aim of this policy is to ensure that all staff, volunteers, interns, non-executives, trustees, consultants and partners can work to prevent abuse and know what to do in response to any allegations, reports or suspicions of abuse.

Everyone has the right to be safe from harm and able to live free from fear of abuse, neglect and exploitation. The policy clarifies the organisation's expectations and seeks to enable Shared Interest to:

- Promote good practice and work in a way that can prevent harm, abuse and coercion from occurring.
- Ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported.

2 DEFINITIONS

2.1 **Adults at risk** are those aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. The reasons for this may include:

- Their gender
- Old age or frailty
- Mental health problems
- Learning or physical disabilities
- Poverty or disadvantaged circumstances
- Disasters or conflicts

2.2 **Children** – children are defined by the UN Convention of the Rights of a Child as being someone under the age of 18 years of age.

2.3 **Abuse** may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act or it may occur when an adult at risk or child is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent to.

Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it. It may be carried out deliberately or unknowingly. Abuse can come in many forms and includes:

- **Physical abuse** – hitting, slapping, pushing, kicking, injuring, misuse of medication, restraint or inappropriate sanctions

- **Sexual abuse** - rape, sexual assault or sexual acts to which a vulnerable adult or child has not consented, or has been coerced into giving consent through psychological abuse.
- **Psychological abuse** - emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidating, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.
- **Financial or material abuse** – theft, fraud, exploitation of disadvantaged circumstances, pressure regarding wills, property or inheritance. Manipulation of financial terms or transactions. Withdrawing of financial support or training services. Misuse or misappropriation of property, possessions or benefits.
- **Neglect and acts of omission** – ignoring medical or physical care needs failure to provide access to appropriate health, social care or educational services. Withholding of necessities of life: medication, adequate nutrition, clothing and shelter.
- **Discriminatory abuse** - ageism, racism, sexism, based on disability or other forms of harassment, slurs, or hate-crime.

3 CODE OF BEHAVIOUR

Applying good practice in our everyday working and life situations must be a priority in all that we do.

You must never:

- Hit or otherwise physically assault or physically abuse others.
- Develop physical/sexual relationships with children or adults at risk.
- Develop relationships with children or adults at risk, which could in any way be deemed exploitative or abusive.
- Place yourself or colleagues in a position where you or they could be accused of sexually abusing a child, young person or adult at risk, i.e. holding or hugging a child, young person or adult at risk, or physically touching children, young persons or adults at risk in a way that could be considered abusive in ways described in this document.
- Spend time alone with children or adults at risk. Plan activities so that more than one person is present or, at least, other people are within sight and hearing. Wherever possible ensure that another adult is present to supervise the activity.
- Take children/adults at risk alone in a car when acting on behalf of Shared Interest, even on short journeys.
- Act in ways that may be abusive or may place a child or adult at risk of abuse.
- Use language, make suggestions or offer advice, which is inappropriate, offensive or abusive.
- Offer benefits such as food, favours, clothes, jobs or money in exchange for sexual favours.
- Show favouritism to any individual for sexual favours in return.
- Act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse.

You must always:

- Treat everyone with dignity and respect, recognising their right to personal privacy.
- Be aware of situations that may present risks and manage these.
- Provide a good example of acceptable behaviour, in a way that is in line and true to the Shared Interest mission, and core values in and out of working hours.
- Be aware of any “power” relationships that exist.
- Plan and organise events so that risks are minimised
- Avoid being drawn into inappropriate attention seeking behaviour, such as tantrums or crushes.
- If travelling, and staying overnight, ensure that adults and children have separate sleeping accommodation.
- Remember that someone else may misinterpret your actions, no matter how well intentioned.
- Adults should avoid being placed in a compromising or vulnerable position. The adult is always considered responsible even if a child behaves seductively.
- Try to ensure that your actions cannot be misunderstood or cause offence and are acceptable within a relationship of trust.
- Show understanding when dealing with sensitive issues including cultural differences and human diversity.
- Remember that we all have a responsibility to challenge unacceptable behaviour and report all allegations/suspensions of abuse.
- Be responsive to reports of abuse and investigate appropriately.
- In order to reduce the likelihood of abuse taking place, staff, volunteers, non executives and trustees and interns should adhere to the Safeguarding Code of Conduct. The Code of Conduct includes guidance on appropriate and expected standards of behaviour towards vulnerable individuals.

Communications

Shared Interest has a commitment to undertake all communications with a child, young person or adult at risk in a safe manner by:

- Taking particular care to ensure the privacy of the child, young person and/or adult at risk.
- Never taking photographs of a child, young person or adult at risk while they are in changing or bathing areas.
- Obtaining consent from the child, young person or adult at risk and/or their parent/guardian to take and publish photographs.
- Ensuring that all photographers and filmmakers adhere to the above and follow the agreed brief, seeking written consent from all individuals involved and their parent/guardian.

Social media

There is also the potential for misuse of social media. The risks associated with user interactive services include cyberbullying, grooming and potential abuse by online predators, identity theft and exposure to inappropriate content including self-harm, racist, hate and adult pornography. Shared Interest will ensure risks associated with social media are explored and managed through the risk assessment and that staff, volunteers, non executives, trustees and interns follow the organisations Social Media Policy.

4. DESIGNATED NAMED PERSON FOR SAFEGUARDING

- 4.1 Shared Interest has an appointed individual who is responsible for dealing with any Safeguarding concerns. In their absence, a deputy will be available for staff to consult with.

Patricia Alexander – MD is the Designated Named Person for Safeguarding
Work Telephone Number: 0191 233 9107
Mobile: 07768044497

Margaret Woodhouse – Head of HR is the Deputy Named Person for Safeguarding.
Work Telephone Number: 0191 233 9138
Mobile: 07754064191

- 4.2 These staff will take on responsibility for:

- Ensuring the Policy is being put into practice
- Being the first point of contact for safeguarding issues.
- Keeping a record of any concerns expressed about safeguarding issues.
- Where necessary, taking further steps, such as referring concerns to other agencies.
- Bringing any child or adult at risk concerns to the notice of the Board, where appropriate.
- Ensuring that paid staff, consultants (including third party), volunteers and Board members are given appropriate training, support and supervision on safeguarding.
- Ensuring that everyone involved in the organisation is aware of the identity of the safeguarding representatives.

- 4.3 Should either of these named people be unavailable then you should speak to a Senior Manager.

5 WHAT SHOULD YOU DO IF YOU HAVE ANY CONCERNS?

- 5.1 If you suspect that a child, young person or vulnerable adult is being, has been or is likely to be abused, you must take action. Under no circumstance should concerns of abuse and inappropriate behaviour be ignored. The need to ensure the immediate physical and psychological safety of the vulnerable adult, child or young person should always be of paramount importance. You must report in situations where:

- You see or suspect abuse.
- An allegation of abuse is made to you.

- The person or child tells you of abuse.

5.2 Reports should be made to the Designated Person as soon as possible (within 24 hours) giving as much detail as possible.

6 IN THE EVENT OF AN ALLEGATION OF ABUSE

6.1 All complaints, allegations or suspicions must be taken seriously.

6.2 This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult or child has been abused.

6.3 Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.

6.4 A full record shall be made as soon as possible of the nature of the allegation and any other relevant information.

6.5 This must include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult or child who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.

7 RESPONDING APPROPRIATELY TO AN ALLEGATION OF ABUSE

7.1 Shared Interest recognises that it has a duty to act on reports, or suspicions of abuse. In the event of an incident or disclosure:

DO

- Make sure the individual is safe
- Reassure them
- Assess whether emergency services are required and if needed call them
- Listen to what they are saying
- Offer support and reassurance
- Ascertain and establish the basic facts
- Record what you have been told/witnessed as soon as possible. Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to the designated Safeguarding person for support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

DON'T

- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond what is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation

- Ask leading questions
- Assume Information
- Make promises
- Ignore the allegation
- Elaborate in your notes
- Panic
- Promise to keep it a secret

7.2 It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This will be determined by the investigation.

8 MANAGING ALLEGATIONS MADE AGAINST STAFF, VOLUNTEERS, TRUSTEES, NON EXECUTIVES, PARTNERS, CONSULTANTS AND INTERNS

8.1 Shared Interest will ensure that any allegations made against those working with them will be dealt with swiftly.

8.2 Where it is thought that a criminal offence has been committed, the police must be informed. If a crime has been witnessed, the police should be contacted immediately.

8.3 The safety of the individual(s) concerned is paramount and it should be ensured that they are safe and away from the person(s) who are the alleged perpetrators.

9 CONSEQUENCES OF BREACH OF SAFEGUARDING POLICY

9.1 If there is an allegation of a violation of the Safeguarding Policy from a verifiable source, the individual concerned may be suspended from all activity/association with Shared Interest pending the outcome of an independent investigation. The investigation must comply with our reporting procedures. Failure to report and breaches of confidentiality in the process will be subject to investigation and disciplinary procedures where applicable. Following the outcome of the investigation, if it has found that an act has been committed in relation to adults at risk/children, whether within or outside the context of the organisation's work, which is either criminal, grossly infringes the adult at risk/child's rights, or contravenes the principles and standards of this policy, Shared Interest will take immediate disciplinary action and any other action which may be appropriate to the circumstances:

- Employees – disciplinary action/dismissal
- Volunteers, non-executives, trustees and interns – ending the relationship with the organisation.
- Consultants – termination of contract.
- Partners – withdrawal of funding/support/contract

Shared Interest may involve the authorities such as the police and/or social services at any stage of the investigation if appropriate to ensure the protection of vulnerable adults/children and pursue a criminal prosecution where this is applicable.

10 CONFIDENTIALITY

- 10.1 Adults at risk or child protection raises issues of confidentiality, which must be clearly understood by all.
- 10.2 Clear boundaries of confidentiality must be communicated to all.
- 10.3 All personal information regarding an adult at risk/child will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines.
- 10.4 If an adult or child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff explain to them sensitively and clearly that, he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.
- 10.5 Within that context, the adult or child must, however, be assured that the matter will be disclosed only to people who need to know about it.
- 10.6 Where possible, consent must be obtained from the adult or child before sharing personal information with third parties. In some circumstances, obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult or child is the priority.
- 10.7 Where a disclosure has been made, staff must let the adult or child know the position regarding their role and what action they will have to take as a result.
- 10.8 Staff must assure the adult/child that they will keep them informed of any action to be taken and why. The adult or child's involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.
- 10.9 This policy needs to be read in conjunction with other policies for the organisation including:
 - Disciplinary and Grievance
 - Privacy Policy
 - Recruitment and Selection
 - Volunteer
 - Whistle Blowing
 - Social Media

11 TRAINING

- 11.1 Training will be provided, as appropriate, to ensure that staff, consultants, non-executives, trustees and volunteers are aware of these procedures.

12 RECRUITMENT PROCEDURE

- 12.1 Shared Interest operates procedures that take account of the need to safeguard and promote the welfare of vulnerable adults and children, including arrangements for appropriate checks on new staff, volunteers, non-executives and trustees where applicable.

13 WHISTLE BLOWING POLICY

13.1 Shared Interest has a Whistle Blowing Policy and staff should familiarise themselves with this policy. Staff will be supported in its use.

14 MONITORING & REVIEW

14.1 Regular monitoring of risks, risk mitigation and the effectiveness of safeguarding measures will be incorporated into Shared Interest's monitoring processes and activities.

14.2 Some ways in which Shared Interest will ensure regular monitoring and review:

- Safeguarding is incorporated into the organisation's risk register and quarterly and annual reporting processes.
- Safeguarding policy requirements are included in Grant and Partnership Agreements with local partner agencies, and contracts with vendors and consultants.
- Child protection and the protection of adults at risk is included as an issue in partner proposal appraisal checklists and in field monitoring report templates.
- Senior management, Board and trustees will regularly review the risk register and organisation reports to ensure that safeguarding measures are in place and effective.
- The policy will be reviewed annually or when it is shown to be necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to UK legislation.

15 TRAINING FOR STAFF, VOLUNTEERS, BOARD AND TRUSTEES

15.1 Training will be carried out. The style, approach, and content of training will vary depending on the audience, but will include, at a minimum:

- An introduction/overview of the concepts of child and adults at risk safeguarding.
- A discussion on how safeguarding policies and procedures can protect children and adults at risk, the staff, and the organisation and what can go wrong when there are no procedures in place.
- An introduction to and discussion of the policy, ensuring all participants understand the purpose of the policy, the content, and terminology.

16 CHILD PROTECTION/PROTECTION OF ADULTS AT RISK INTERNATIONALLY

16.1 Shared Interest works in a large number of countries and across a broad range of circumstances. Translating child protection/protection of adults at risk across these different contexts and cultures can be difficult. Some legal and cultural frameworks may vary but the commitment from Shared Interest to protect children, young people and adults at risk remains.

A commitment to child protection/protection of adults at risk is fundamental to Shared Interest's partnership approach to work. Shared Interest, through its representatives, will challenge and help new and existing partners (where they are not already doing so) to address child protection/protection of adults at risk issues in their organisation

and in the communities in which they work. All Shared Interest partners will be required to explain what measures they have in place to protect children and adults at risk from abuse.

International staff, in the course of their work should support partners in their efforts to increase their awareness, knowledge and skills in relation to child protection/protection of adults at risk issues through the provision of appropriate capacity building and resources.

Where projects involve close contact with children, young people or adults at risk and the partner does not have a written child protection/protection of adult at risks policy, they will be required to adhere to our Code of Conduct.

17 CHILD PROTECTION/PROTECTION OF ADULTS AT RISK CONSIDERATIONS FOR EXISTING AND POTENTIAL INVESTORS AND DONORS

At any point in their lives, our members or enquirers may find themselves financially vulnerable. This could be due to a significant event, loss of income, illness or other life challenges. Shared Interest is committed to ensuring anyone who interacts with investors, enquirers or donors take all reasonable measures to ensure that the risks of harm to welfare are minimised and that the person is treated fairly.

If you are concerned about an investor, donor or enquirer or if you have any concerns that they are being pressured to act in a way that is not in line with their wishes, then you must raise this with the Head of Member Engagement and the Designated Named Person for Safeguarding.

With the permission of the investor/donor/enquirer, staff may record that an individual requires help with their Share Account or donation. This will help staff members support the individual in the future. This could include making a note of accessibility needs, such as deteriorating sight or hearing, dementia, mobility or long-term health conditions, which effect the person's ability to manage their Share Account.

If you are concerned that the investor is not acting of their own free will, you could ask to speak to the individual alone.

If you are concerned that the investor is confused or acting erratically then you could, with the investor/ enquirers permission, contact others to help such as a family member, or a trusted friend, their solicitor or Social Services.

If you suspect that fraud is happening then this should be reported to the Money Laundering Reporting Officer immediately.

Tim Morgan – Finance Director is the Designated Money Laundering Reporting Officer
Work Telephone Number: 0191 233 9130
Mobile: 07961 845865

Andy Jones – Head of Technology & Risk is the Deputy Money Laundering Reporting Officer.
Work Telephone Number: 0191 233 9121
Mobile: 07990 040510

18 HANDLING EXTERNAL CONCERNS

Internal concerns are those where persons covered by the policy are the alleged perpetrators, i.e., employees, consultants, partners, volunteers, interns, non executives or trustees.

External concerns are abuses, which would usually be considered criminal under local legislation, and perpetrated by persons not described in the scope of this policy. Shared Interest should not ignore any protection issues of concern; however, abuse in the wider community is an external concern, and Shared Interest and/or its Safeguarding Representative would need to consider how to appropriately and effectively refer issues. Clearly, if a child or adult at risk is in immediate need of attention then staff must act, but must consider how much support they are qualified or able to provide, and recognise when it is best to refer.