

FAVERSHAM CREEK TRUST

The Purifier Building • North Lane • Faversham • Kent • ME13 7DY

General Policies and Procedures

The twelve policies and procedures in this document set out the basis for the management of the Faversham Creek Trust and its activities. Policies relating to the raising and distributing of funds, the governance of the board and the safe management of the Purifier Building are contained in separate documents also available on the Trust's website at www.favershamcreektrust.com.

Click on the relevant page number to take you to the policy of interest.

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Conflict of Interest and Anti-Bribery Policy

Purpose

The Trust is committed to conducting all its business activities with integrity, honesty, and transparency, and to ensuring that all its activities are free from bribery and corruption.

The purpose of this policy is to ensure that trustees, staff and volunteers of Faversham Creek Trust (“the Trust”) always act in the best interests of the charity and avoid situations where personal or external interests could improperly influence decisions. The policy sets out the Trust’s commitment to prevent bribery and corruption and to comply with the UK Bribery Act 2010 and Charity Commission regulatory guidance.

Definition of Conflict of Interest

A conflict of interest arises when an individual’s personal, financial or organisational interests - whether direct or through family, friends, or associates - could interfere with their duty to the Trust. This includes interests in other community groups, businesses, or public bodies that may benefit from the Trust’s work.

Examples of conflicts

Conflicts may include (but are not limited to):

- A trustee who is also a member of a local government committee making planning decisions affecting Faversham Creek.
- A volunteer involved in another community group seeking funding or resources from the Trust.
- A staff member whose family business provides services (e.g., construction, event management, boat repair) to a project managed by the Trust.
- Participation in a harbour or town regeneration group where Trust proposals are under discussion.

Prohibited conduct

The following conduct is strictly prohibited and will not be tolerated under any circumstances:

- Offering, promising, giving, requesting, agreeing, receiving or accepting any gifts, payments, hospitality or other form of improper inducement, whether financial or non-financial, to or from any person or organisation, for the purpose of gaining any commercial, contractual, regulatory, or personal advantage
- Engaging in any conduct that could constitute an offence under the UK Bribery Act 2010, or any other applicable anti-bribery or anti-corruption laws.



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- Making any facilitation payments, which are small payments made to secure or expedite routine government or local authority action, such as obtaining a permit or processing official documents.
- Failing to disclose any actual or suspected bribery or corruption to the Trust's board or, where necessary, to the appropriate authorities.
- Retaliating or threatening retaliation against any individual who reports a suspected violation of this policy, or who refuses to engage in any conduct that could violate this policy.
- Any conflict of interest or self-dealing transaction that may harm the Charity.

Duty to declare

Any conflict of interest or prohibited behaviour must be declared and may not be accepted if inappropriate. All trustees, staff, and volunteers must:

- Declare any actual, potential, or perceived conflict as soon as it arises.
- Record the declaration in the Trust's Conflict of Interest Register.
- Update the register annually and confirm any changes.

Management of conflicts

When a conflict is identified:

- The individual must explain the nature of the conflict to the chair or meeting lead.
- The board will decide how to manage it, which may include:
 - Excluding the individual from related discussions or decisions.
 - Seeking independent advice.
 - Recording all actions in the meeting minutes.

If a conflict cannot be managed in the Trust's best interests, the individual may be required to withdraw from the matter entirely.

Any gifts, payments, or hospitality that could be seen to influence decisions must be declared and may not be accepted if inappropriate.

Compliance and review

Failure to declare a conflict may breach legal duties under the Charities Act 2011. This policy will be reviewed annually by the board of trustees to ensure it remains current and effective.



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Trustees' Expenses policy and procedures

Purpose

This policy ensures that trustees are reimbursed for legitimate expenses incurred in carrying out their duties, while safeguarding the charity's funds and ensuring all costs remain reasonable and necessary.

Policy statement

- Trustees serve on a voluntary basis and are not paid for their time.
- Expenses will be reimbursed only where essential to the performance of trustee duties and kept to an absolute minimum.
- All expenses must be approved in advance by the Chair of Trustees (or, if the Chair is claiming, by the Treasurer or another trustee).
- Claims must be submitted within one month of the expense being incurred.
- Reimbursement will be made by bank transfer upon approval.

Allowable expenses

Expenses may include:

- Travel costs for attending approved Faversham Creek Trust ("the Trust") meetings or events (public transport, mileage at HMRC approved rates, parking).
- Postage, printing, or stationery required for Trust business.
- Other minor costs agreed in advance by the Chair.

Procedures

1. Prior Approval – Obtain written (email or signed note) approval from the Chair before incurring any expense.
2. Receipts – Submit original receipts or electronic copies for all claims. Claims without receipts will not normally be reimbursed.
3. Expense Form – Complete the Trust's expense claim form and submit to the Treasurer within one month of the expense date.
4. Payment – Once approved by the Chair or alternate, the Treasurer will arrange reimbursement promptly.

Compliance and review

The Trust will maintain an expenses record for audit and reporting purposes. This policy will be reviewed annually by the trustees to ensure it remains fit for purpose.



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Campaigns and Political Activity policy

Purpose

Faversham Creek Trust (“the Trust”) exists to advance its charitable objects, including the preservation, regeneration, and community use of Faversham Creek. This policy ensures that any campaigning or political activity is undertaken in a way that complies with UK charity law and maintains the Trust’s independence.

Key Principles

- The Trust must remain independent, non-party-political, and focused solely on its charitable aims.
- The Trust may engage in campaigning or advocacy to further its charitable objectives, for example promoting policies or projects that support environmental protection, heritage conservation or sustainable development.
- The Trust may not support or oppose any political party or candidate, nor give funds or resources to them.

Campaigning

The Trust may:

- Provide evidence-based information to influence local or national policy affecting Faversham Creek.
- Work with community groups, local authorities, and government bodies to promote charitable objectives.
- Participate in public consultations, petitions, or community campaigns that further the Trust’s aims.

Political Activity

Political activity must never become the sole or continuing focus of the Trust. The Trust may engage in political activity (e.g. lobbying for specific legislation or local planning policies) only where:

- It is a means of achieving the Trust’s charitable purposes.
- It is time-limited and proportionate.
- It is approved by the trustees and recorded in board minutes.

Roles and responsibilities

- Trustees must ensure all campaigns are clearly linked to the Trust’s charitable objects and recorded in board minutes.
- Staff and volunteers must not make statements on behalf of the Trust that could be interpreted as endorsing a political party or candidate.
- Public statements must be factual, respectful, and supported by evidence.



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Compliance and review

This policy is based on Charity Commission guidance ([Campaigning and political activity guidance for charities \(CC9\) - GOV.UK](#)). It will be reviewed annually to ensure the Trust continues to comply with legal and regulatory requirements.



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Safeguarding policy

Purpose

Faversham Creek Trust (“the Trust”) is committed to providing a safe and welcoming environment for everyone who takes part in our activities. Although the Trust’s main work does not involve children or vulnerable adults, we occasionally host events and activities where they may be present. This policy sets out our commitment to safeguarding and the procedures we will follow to protect those at risk.

Scope

This policy applies to all trustees, staff, volunteers, contractors, and anyone representing the Trust.

Commitment

- The welfare of children, young people, and vulnerable adults is paramount.
- All individuals have the right to participate in Trust activities in a safe and positive environment.
- We will act promptly on any safeguarding concerns and always put the interests of the child or vulnerable adult first.
- We will comply with relevant UK safeguarding legislation and Charity Commission guidance.

Responsibilities

- The board of trustees holds overall responsibility for safeguarding.
- All trustees, staff, and volunteers share a duty to remain vigilant and to report any concerns immediately to the Chair of Trustees or, if unavailable, another trustee.

Procedures

1. Planning events
 - a. Where activities involve children or vulnerable adults, risk assessments will be completed in advance.
 - b. Adequate supervision will be arranged, with at least two adults present whenever possible.
 - c. Consent will be obtained from parents/guardians for organised children’s activities.
2. Code of conduct
 - a. Trustees, staff, and volunteers must behave respectfully and avoid any conduct that could be misinterpreted.
 - b. Physical contact should be avoided unless absolutely necessary for safety reasons.



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3. Reporting concerns
 - a. Any safeguarding concern, disclosure, or incident must be reported immediately to the Chair of Trustees or another trustee.
 - b. The trustee receiving the report will decide on further action, which may include contacting Kent County Council's Children's Services, Adult Social Care, or the NSPCC helpline (0808 800 5000).
 - c. In an emergency, dial 999.
4. Record keeping
 - a. All concerns will be documented securely and kept confidential in line with data protection law.

Training

Trustees, staff, and key volunteers will receive basic safeguarding awareness training appropriate to their role.

Review

This policy will be reviewed annually, or sooner if there are significant changes in the Trust's activities or legislation.



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Serious Incident Reporting policy and procedures

Purpose

This policy sets out how Faversham Creek Trust (“the Trust”) will identify, record and report serious incidents to the Charity Commission and other relevant authorities to protect the charity’s beneficiaries, reputation and assets.

Definition of a serious incident

A serious incident is an adverse event, whether actual or alleged, that results in or risks significant:

- Harm to beneficiaries, staff, volunteers or the public (e.g. safeguarding breaches, abuse, serious accidents).
- Loss of charity funds or assets including theft, fraud, cybercrime or significant data breaches.
- Damage to property or significant operational disruption.
- Harm to the charity’s reputation (e.g. public scandal, negative media coverage).
- Criminal activity affecting the charity.

Examples include:

- A safeguarding concern at a community event.
- Fraudulent activity or misappropriation of funds.
- Major environmental or safety incident on Trust property.
- Serious governance breakdown (e.g. trustee conflicts not managed, mass resignation).

Policy statement

- The trustees are collectively responsible for recognising, assessing, and reporting serious incidents to the Charity Commission as soon as reasonably possible.
- The Trust will act transparently and take immediate steps to protect people, property, and funds.
- Where other regulators or agencies (e.g. police, local authority, ICO) must be notified, this will be done without delay.

Procedures

1. Identification & immediate action
 - a. Any trustee, staff member or volunteer who becomes aware of a potential serious incident must inform the Chair of Trustees (or, if unavailable, another trustee) immediately.



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- b. Immediate steps should be taken to protect individuals and secure assets (e.g. contacting emergency services, isolating systems, suspending payments).
2. Assessment
 - a. The trustees will meet (in person or virtually) as soon as possible to assess:
 - i. The nature and seriousness of the incident.
 - ii. Risks to people, assets, and reputation.
 - iii. Immediate containment actions.
3. Reporting
 - a. If the incident meets the Charity Commission's reporting criteria, the Chair (or a delegated trustee) will submit a Serious Incident Report via the Charity Commission's online form without undue delay.
 - b. Reports to other bodies (police, ICO, insurers, local authority) will be made as required.
4. Recording
 - a. Actions taken will be recorded in the Serious Incident Log, including dates, decisions, and follow-up measures.
5. Follow-up and review
 - a. Trustees will monitor the situation, cooperate with any investigations, and implement any lessons learned to prevent recurrence.
 - b. An update will be submitted to the Charity Commission when the incident is resolved.

Responsibilities

- All trustees share collective responsibility for identifying and reporting serious incidents.
- The Chair of Trustees acts as the main contact with the Charity Commission and other regulators.

Charity Commission criteria

The Charity Commission requires trustees to report serious incidents that have resulted in, or risk, significant harm to beneficiaries, staff, volunteers, the public, the charity's property, work, or reputation. Detailed guidance and reporting criteria can be found here:

<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

Review

This policy will be reviewed annually or sooner if there is a significant change in Charity Commission guidance or the Trust's operations.



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Bullying and Harassment policy and procedures

Purpose

Faversham Creek Trust (“the Trust”) is committed to providing an environment where everyone - trustees, staff, volunteers, members and visitors - is treated with dignity and respect. Bullying and harassment will not be tolerated under any circumstances.

Scope

This policy applies to all trustees, employees, volunteers, contractors, and anyone engaged in Trust activities, whether on Trust premises, at events or when representing the Trust in the community.

Policy statement

- The trust will take all complaints of bullying or harassment seriously, whether informal or formal.
- All individuals have the right to work and participate in an environment free from intimidation, humiliation, victimisation, or offensive behaviour.
- Bullying and harassment may occur face-to-face, by phone, email, online, or through social media.

Definitions

Bullying

Unwanted behaviour that is offensive, intimidating, malicious, or insulting that undermines, humiliates or causes emotional or physical harm to the recipient. Examples include:

- Persistent criticism of someone’s work or deliberately making unreasonable demands.
- Deliberately and/or repeatedly excluding someone from meetings or activities such as team events.
- Constantly putting someone down in team meetings.
- Spreading malicious rumours or malicious gossip about someone.
- Putting humiliating, offensive or threatening comments or photos on social media.

Bullying behaviour can be harassment if it refers to a protected characteristic as described below.

Harassment

Unwanted conduct related to a protected characteristic (such as age, sex, race, disability, religion, or sexual orientation) that violates a person’s dignity or creates a hostile, degrading, or offensive environment. Harassment is defined under the Equality Act 2010.



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Procedures

Procedures for dealing with complaints of bullying or harassment follow the Trust's Complaints procedure laid out in this document.

Protection against victimisation

Anyone who raises a concern in good faith will not suffer retaliation. Victimisation of a complainant or witness will be treated as misconduct.

Responsibilities

- Trustees are responsible for ensuring this policy is implemented, investigating complaints, and taking appropriate action.
- All individuals involved in Trust activities are expected to behave respectfully and support a culture of dignity and inclusion.

Confidentiality

All complaints will be handled sensitively and confidentially, with information shared only on a need-to-know basis.

Review

This policy will be reviewed annually, or sooner if required by changes in law or the Trust's operations.



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Social Media policy and procedures

Purpose

Faversham Creek Trust (“the Trust”) uses social media to share news, promote events, engage the community and raise awareness of its charitable work. This policy provides guidance to ensure social media is used responsibly, consistently, and in a way that protects the trust’s reputation.

Scope

This policy applies to trustees, staff, volunteers, contractors, and anyone authorised to post on or manage the Trust’s social media accounts, currently including:

- Facebook
- Instagram
- LinkedIn
- Website

Principles

- Social media activity must support the Trust’s charitable aims and reflect its values of respect, openness and community engagement.
- All content must be accurate, respectful and non-party political.
- The Trust will not tolerate offensive, discriminatory, defamatory or misleading content.
- Legal requirements, including copyright, data protection, and safeguarding must always be observed.

Roles and responsibilities

- The board of trustees has overall responsibility for social media strategy and compliance with this policy.
- Day-to-day posting and monitoring will be managed by designated administrators approved by the trustees.
- Administrators are responsible for ensuring posts are factual, positive, and free of confidential or sensitive information.
- Trustees, staff, and volunteers using personal accounts must make it clear when expressing personal views and avoid implying endorsement by the trust.

Procedures

1. Account management
 - a. Login details will be held securely by the chair of trustees and shared only with authorised administrators.



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- b. Passwords will be updated regularly and whenever an administrator leaves their role.
2. Content approval
 - a. Routine updates (for example, event promotion or photos of activities) may be posted by authorised administrators without prior approval if they follow agreed messaging guidelines.
 - b. Posts on sensitive issues (for example, planning decisions, partnerships, fundraising appeals) must be approved in advance by the chair or a designated trustee.
3. Community interaction
 - a. Comments and messages will be monitored regularly.
 - b. Offensive, abusive or spam content will be removed as soon as possible, and serious issues reported to the trustees.
4. Photography and safeguarding
 - a. Permission must be obtained before posting identifiable photos of children or vulnerable adults.
 - b. Where possible, group shots will be used and the names of children will not be published.

Personal use of social media

- Trustees, staff, and volunteers are welcome to share the Trust's public posts but must avoid making statements on personal accounts that could harm the Charity's reputation.
- Anyone identifying themselves as connected to the Trust must uphold the same standards of respect and accuracy.

Breach of policy

Failure to follow this policy may result in removal of posting privileges, trustee disciplinary action or reporting to external authorities where appropriate.

Review

This policy will be reviewed annually or sooner if social media platforms or risks change.



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Engaging External Speakers policy and procedures

Purpose

Faversham Creek Trust (“the Trust”) occasionally invites external speakers to charity events, workshops, or community activities to share expertise, knowledge, or inspiration. This policy ensures that any engagement is appropriate, consistent with the Trust’s values and managed safely and transparently.

Scope

This policy applies to all trustees, staff, volunteers and anyone involved in organising events or engaging external speakers on behalf of the Trust.

Policy statement

- It is preferred that external speakers align with the Nolan principles of public life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership).
- Speakers must not promote political parties or commercial products for personal gain or air discriminatory views when speaking at Trust events.
- Speakers must not belong to or represent a proscribed organisation.
- The Trust will take reasonable steps to ensure the suitability of speakers and to protect speakers, attendees, staff and volunteers from violent, threatening or abusive behaviour at an event.
- Any arrangements involving payment, travel or expenses must comply with the Trust’s financial and expenses policies.

Procedures

1. Planning and approval
 - a. Event organisers must propose external speakers in advance, providing details of the speaker, topic and intended audience.
 - b. The proposal must be approved by the chair of trustees or a delegated trustee before the speaker is formally invited.
 - c. Risk assessments for the event, including the speaker’s activities, venue safety and safeguarding considerations must be completed.
2. Due diligence
 - a. Basic checks should be made on the speaker’s background, qualifications and suitability for the event.
 - b. If the speaker may work with children or vulnerable adults, appropriate safeguarding checks (e.g., DBS disclosure) must be completed where required.
 - c. References or previous engagements may be requested if necessary.



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3. Engagement and agreements
 - a. Terms of engagement should be confirmed in writing, including date, time, location, topic and any fees or expenses.
 - b. Speakers should be informed of the Trust's expectations regarding content and delivery (see below under Responsibilities).
 - c. For online or hybrid events, technical requirements and protocols should be clarified in advance.
4. Event conduct
 - a. Trustees or staff present should monitor the event to ensure the speaker's content and behaviour remain appropriate.
 - b. Any complaints or concerns during the event must be recorded and reported to the trustees promptly.
5. Post-event review
 - a. Feedback should be collected from attendees and organisers to assess the suitability and impact of the speaker.
 - b. Any lessons learned should inform future speaker engagements and policy updates.

Responsibilities

- Trustees are responsible for approving speakers and overseeing compliance with this policy.
- Staff and volunteers organising events must ensure procedures are followed and document all approvals and checks.
- Speakers are responsible for delivering content in a respectful, professional and lawful manner.

Review

This policy will be reviewed annually, or sooner if there are changes in the trust's operations, legal requirements or feedback from events.



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Complaints policy and procedures

Purpose

Faversham Creek Trust (“the Trust”) is committed to delivering its charitable objects and maintaining a positive relationship with its members, volunteers and the wider community. This procedure provides a clear, fair and transparent process for handling complaints.

Scope

This procedure applies to complaints from members, volunteers, participants or the public regarding the Trust’s activities or conduct of its trustees, staff or volunteers.

Policy statement

- The Trust takes all complaints seriously and aims to resolve issues promptly and fairly.
- Complaints will be treated confidentially, with information shared only on a need-to-know basis.
- Retaliation against a complainant will not be tolerated.

Procedure

The aim of this procedure is to ensure that a person with a relevant grievance relating to their experience with the Trust (“a complainant”) can use a simple procedure to resolve their concerns as quickly and fairly.

1. Making a complaint
 - a. A complaint must be made within two months of the incident occurring.
 - b. A complaint cannot be made on behalf of someone else.
 - c. The complainant should make specific the details of their complaint and what led to it in writing (by email or letter) to a trustee not involved with the complaint (“the Trust’s representative”).
 - d. Where a complaint cannot be made in writing, it may be reported verbally to the Trust’s representative, who will assist in documenting it.
 - e. The complainant should then discuss their complaint informally with the Trust’s representative.
 - f. If the complainant feels that the matter has not been resolved through informal discussion, they should submit their complaint in writing (by email or letter) to the chair of trustees.
2. Acknowledgement
 - a. The Trust’s representative will acknowledge receipt of the complaint within ten working days.
 - b. The acknowledgement will provide an estimated timeframe for resolution and contact details of the person handling the complaint.



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3. Investigation

- a. The trustees will investigate the complaint promptly and fairly.
- b. Information relevant to the complaint will be gathered and all parties involved will have the opportunity to provide their account.
- c. A written response will be given to the complainant's statement, inviting the complainant to a meeting where the alleged grievance can be discussed.
- d. This meeting should take place within 10 working days of such response and the complainant will be informed of their right to be accompanied by a companion.
- e. Complainants must take all reasonable steps to attend the meeting but, if for any unforeseen reason they cannot attend, then the meeting will be rearranged, if possible within 10 working days of the original date.
- f. Should a complainant's companion be unable to attend, then attempts will be made to arrange an alternative date that falls within 10 working days of the original date provided.
- g. Only two further rearrangements will be permitted for whatever reason before the complaint is terminated.
- h. If the chair of trustees is the subject of the complaint, another trustee will handle the process.

4. Resolution

- a. After the meeting, the Trust's representative will write to the complainant informing them of any decision or action and offering them the right of appeal, including details of how to appeal.
- b. The response will normally be issued within 10 working days of the meeting. If a longer timeframe is needed, the complainant will be informed.

5. Appeal

- a. If the complainant is not satisfied with the outcome, they must set out their grounds of appeal in writing within 10 working days of receipt of the decision letter.
 - i. Appeals relating to abuse of process or a perverse decision will be considered.
 - ii. Disagreement with the outcome is not considered suitable grounds for appeal.
- b. Within 10 working days of receipt of an appeal letter, the complainant should receive a written invitation to attend an appeal meeting. The appeal meeting should be taken by the chair of the Trust. If the chair is the subject of the complaint, the meeting will be taken by a patron of the Trust or an independent, external, arbiter appointed by the board of trustees.
- c. After the appeal meeting, the chair, patron or arbiter will inform the complainant in writing of their decision within 10 working days of the meeting. This decision will be final.



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Record keeping

- All complaints, investigations, and outcomes will be documented and stored securely for monitoring and review purposes.

Review

- This procedure will be reviewed annually to ensure it remains effective and consistent with best practice.



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Investing Charity Funds policy

Purpose

This policy ensures that Faversham Creek Trust (“the Trust”) manages its funds responsibly, safeguarding capital while generating fair returns to support its charitable objectives.

Scope

Applies to all funds held by the Trust, including restricted and unrestricted funds.

Policy statement

- The Trust will only invest in term deposits or similar low-risk, interest-bearing accounts with reputable UK financial institutions. Given the small size of the Trust and the need to safeguard capital while maintaining liquidity for planned activities, the policy recommends term deposits as a low-risk investment. Should the board decide in the future that different investment approaches are appropriate, the policy will be reviewed and updated accordingly.
- The primary objective is the protection of capital, not maximising returns.

Restricted funds

- Trustees must ensure that any investment does not compromise the ability to use these funds for their intended charitable purpose.

Authority and responsibility

- The board of trustees is responsible for approving all investment decisions.
- Any investment must be authorised by at least two trustees, including the chair or treasurer.
- Trustees must ensure that records of all deposits, interest earned and maturity dates are maintained.

Term deposits

- Deposits may be made for periods that balance the need for liquidity with the opportunity to earn interest, generally up to 12 months unless otherwise authorised by the trustees.
- Funds should only be deposited with institutions that are covered by the Financial Services Compensation Scheme (FSCS) to the maximum amount permitted.
- Trustees will review the deposit schedule regularly to ensure funds are available when required for charitable activities.



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Monitoring and reporting

- The treasurer will provide regular updates to the board of trustees on the status of all deposits, interest earned and any upcoming maturities.
- Any changes to this policy or deviations from the approved investment approach must be formally recorded and approved by the trustees.

Review

- This policy will be reviewed annually to ensure it remains appropriate for the charity's objectives and financial position.



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Internal Risk Management policy

Purpose

The purpose of this policy is to provide a structured approach to identifying, assessing, managing, and monitoring risks within Faversham Creek Trust (“the Trust”). Effective risk management helps safeguard the charity’s assets, volunteers, staff, and reputation, while supporting the achievement of its charitable objectives.

Scope

This policy applies to all trustees, volunteers, and staff involved in the governance or operations of the trust.

Policy statement

- The Trust is committed to a proactive approach to risk management, integrating it into decision-making, planning, and operational processes.
- The board of trustees accepts responsibility for identifying and managing significant risks, including financial, operational, reputational, and compliance risks.
- Risk management is proportionate to the size of the Trust and the nature of its activities.

Risk identification and assessment

Trustees will identify potential risks relating to the Trust’s:

- Financial management, including safeguarding restricted and unrestricted funds
- Volunteer and staff safety
- Operations and events, including activities on or around Faversham Creek
- Legal and regulatory compliance, including charity law and health & safety
- Reputation, including communications and social media activity

Risks will be assessed in terms of likelihood and impact on the trust’s operations and objectives.

Risk management and mitigation

For each identified risk, trustees will agree actions to mitigate or manage the risk, including policies, procedures and controls. Examples of mitigation include:

- Financial controls for authorising expenditure and investments
- Health and safety procedures for volunteers and building users
- Safeguarding and volunteer training
- Insurance coverage where appropriate
- High-priority risks will be reviewed more frequently and reported to the board.



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Monitoring and reporting

- The board will maintain a risk register documenting identified risks, their assessment, mitigation measures and review dates.
- Trustees will review the risk register at least annually and update it in response to changes in operations, funding or external factors.
- Significant incidents or emerging risks will be reported promptly to the board for review and action according to the board's internal controls procedure.

Roles and responsibilities

- The board of trustees has overall responsibility for risk management.
- Trustees may delegate monitoring of specific risks to committees or designated individuals but accountability remains with the board.
- Volunteers and staff are expected to report potential risks or incidents promptly to trustees.

Review

- This policy and the risk register will be reviewed annually to ensure they remain relevant and effective.
- The board may revise the risk management approach if circumstances or operations change.



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Data Protection and Privacy policy

Purpose

Faversham Creek Trust (“the Trust”) is committed to protecting the personal data of its members, volunteers, trustees and other stakeholders. This policy explains how the trust collects, uses, stores and protects personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Scope

This policy applies to all personal data held by the Trust, including information about members, volunteers, trustees, suppliers and participants in Trust activities.

Data controller

Faversham Creek Trust is the data controller under UK GDPR and is responsible for ensuring that personal data is processed lawfully, fairly, and transparently.

Personal data collected

The Trust collects only the personal information necessary to manage its activities, which may include:

- Name, address, telephone number, email address
- Membership details and subscription information
- Records of participation in events, volunteering or trustee activities

Why we process personal data

- To manage membership subscriptions and engagement with members
- To communicate information about events, activities and governance matters
- To comply with legal obligations or regulatory requirements

Processing is based on one or more of the lawful bases permitted under UK GDPR, including:

- Contractual necessity (for membership management)
- Legitimate interests (for communications about the charity’s activities)
- Consent (for optional email communications, which can be withdrawn at any time)

How we store and protect data

- Personal data is held securely by the Membership Secretary.
- Data is stored electronically using reputable cloud providers (e.g., Dropbox, MailChimp) that are UK GDPR-compliant and provide appropriate technical and organisational safeguards.
- Access to personal data is restricted to trustees and authorised staff on a need-to-know basis.



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- Paper records, where kept, are stored securely and destroyed when no longer required.

Data sharing and third parties

- The Trust does not sell or share personal data with third parties outside the charity, except where required by law or necessary for the provision of services (e.g., event registration).
- Any third-party processor used by the Trust is assessed for compliance with UK GDPR.

Retention of personal data

- Personal data is retained only as long as necessary for the purpose for which it was collected.
- Membership records are kept while someone is an active member and removed from the database six months after non-renewal or resignation.
- Records required for legal, regulatory, or historical purposes may be retained longer as permitted by law.

Your rights

Individuals have the right to:

- Access personal data held about them
- Request correction of inaccurate or incomplete data
- Request deletion or restriction of processing where applicable
- Withdraw consent to marketing communications at any time
- Complain to the Information Commissioner's Office (ICO) if they believe their personal data has been mishandled (www.ico.org.uk).

Procedures

- Any request to access, correct or delete personal data should be directed to the Membership Secretary.
- The Trust will respond to requests within one month, in line with GDPR requirements.
- Data breaches will be reported promptly to the ICO if they meet the regulatory threshold, and affected individuals will be informed as required.

Review

- This policy will be reviewed annually by the board of trustees and updated as necessary to ensure compliance with legal requirements and best practice.



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