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In view of the size and nature of the Charity's activities the Trustees have concluded that there is no significant level of risk to the Charity's funds, other than that which can be managed by prudent book-keeping and budgetary procedures, annual independent examination or audit of the accounts, secure operation of the Charity's banking arrangements and proper insurance.

Trustees additionally regularly review investment management arrangements to ensure that capital values are maintained.

The Trustees consider that the present arrangements are satisfactory.

**Conflicts of Interest Policy**

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Trustees acknowledge that conflicts of interest will happen from time to time, but recognise that the management of such conflicts is of key importance. Therefore Trustees will:

- (1) declare the nature and extent of any interest, direct or indirect, which he or she has in a proposed transaction or arrangement with the Charity or in any transaction or arrangement entered into by the Charity which has not previously been declared; and
- (2) absent himself or herself from any discussions of the charity trustees in which it is possible that a conflict of interest will arise between his or her duty to act solely in the interests of the Charity and any personal interest (including but not limited to any financial interest).

Any Trustee absenting himself or herself from any discussions in accordance with this policy must not vote or be counted as part of the quorum in any decision of the Trustees on the matter.

## Complaints Handling

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Anyone who has a concern or complaint about any aspect of operation is encouraged to raise this in the first instance informally with the Secretary. If that is not possible, or the matter is not resolved informally, the complaint should be set out in writing and addressed to the Chairman of Trustees and marked Private and Confidential.

The Chairman will investigate the complaint, and will aim to produce a decision, which is final, within 28 working days of receiving the letter. He will notify the person or organisation who complained and the reason for the decision.

All written complaints received, together with a copy of the response will be notified to the Board of Trustees. Complaints, both formal and informal, will be monitored, and information from this will be fed in to the planning process as appropriate.

## Data Protection and Information Policy

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The Data Protection Act 1998 (DPA) and the EU General Data Protection Regulations (2018) (GDPR) regulate the way in which certain information about individuals is held and used.

### The purpose of this policy is to enable the organisation to:

- ensure users are aware of and comply with the law in respect of the data it holds about individuals;
- ensure information is available to those who need it to fulfil their roles within the organisation
- be open and honest with individuals whose data is held
- protect the organisation from the consequences of a breach of its responsibilities
- maintain confidentiality

### This policy applies to:

- All Trustees and any persons not directly employed by the organisation who may have legitimate access to data held by the organisation
- All personal data, sensitive personal data and confidential operational information processed by the organisation pursuant to its general activities.

### Use of data and information

- Information held on individuals in relation to grant applications is stored and processed in accordance with our legitimate interest to do so.
- Information held on other individuals (ie trustees) is stored and processed in accordance with our legal obligation to do so.
- In any case, information is only to be accessed and used by Trustees in line with the DPA and GDPR in connection with the execution of their duties.
- The organisation will not hold more personal or sensitive personal data than is needed to fulfil its core objectives and shall obtain consent prior to sharing such data outside of the organisation, other than in the fulfilment of any statutory or regulatory obligations
- Personal information held (and the categories of personal information) is reviewed on a regular basis to ensure the information held is still relevant to our work and is accurate. If we discover that certain information we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this information as may be required. All personal or sensitive personal data covered by this policy will be held for a maximum period of 7 years and thereafter anonymised or securely destroyed.

### Security of data

- All Trustees storing data covered by this policy are responsible for ensuring that all computers and all mobile devices are password protected and/or encrypted.
- Paper records and other non-electronic formats of personal, sensitive or confidential information must be kept securely with appropriate security measures in place and access restricted to appropriate persons only.
- All information covered by this policy should always be encrypted or password protected where possible when in transit.
- All covered by this policy should be securely backed up on an encrypted device on a regular basis.

**Approved: November 2019**

## **Roles and responsibilities**

- Under the DPA, the Board of Trustees is responsible for ensuring that the Trust complies with its legal obligations.
- All Trustees are required to read, understand and accept this policy. All Trustees shall be responsible for the operational security of the information system they use, whether electronic or paper based.
- Mr John Pike, Trustee, will is also responsible for:
  1. Briefing the Board on Data Protection issues
  2. Reviewing the Data Protection Policy annually or sooner if required by legislation
  3. Ensuring that Data Protection induction and training takes place as appropriate
- The Secretary will also be responsible for maintaining the organisation's notification with the ICO

## **Access to information**

Individuals who have data held about them have the right to see any data that identifies them or is specific to them as an individual. Requests to access data are to be made in writing to the Secretary by the individual concerned or their recognised appointed representative. Prior to providing information, the identity of the individual and their right to be provided with the information will be verified. The required information will be provided in accordance with the requirements of GDPR.

## **Reporting breaches of the DPA/GDPR**

In the event that a Trustee feels that a breach of the DPA may have occurred, the incident must be reported immediately to the Chairman of Trustees, who will investigate and implement a recovery plan where appropriate and decide on any further action. If a breach is likely to result in a risk to an individual's information rights and freedoms, we will inform them as soon as possible and may also report it to the ICO.

## Privacy Policy

As part of our grant-making activities, Yorkshire CCC Youth Trust processes and uses data that applicants and grantees provide about their projects, organisations, beneficiaries and the applicants themselves. We obtain and use such information, including a record of any correspondence between you and us to assess applications, monitor the use of funding, conduct evaluations and publicise our grant-making and consider that under the EUs General Data Protection Regulations (GDPR) our legal basis for doing so is by way of our legitimate interest.

This includes transfer to and use by such individuals and organisations as we deem appropriate, but we won't share your information with any other organisations for marketing, market research or commercial purposes, and we don't pass on your details to other websites.

We will only keep your personal data for as long as is necessary to fulfil our legitimate interest and in any case, for a maximum period of seven years. During this time we shall take all reasonable steps to ensure that it is safe and secure and to safeguard and protect against unlawful access and accidental loss or damage. Thereafter we will take steps to ensure its safe and secure disposal.

We may also process and use personal data from other individuals (eg trustees) to fulfil our legal obligations.

We may pass on your personal information if we have a legal obligation to do so, or if the requirement to submit a report following the award of a grant is not met.

Please note: You do not have to supply any personal information to us but our services may not be operable in practice without providing personal information to us.

Our website may contain links and references to other websites. Please be aware that this notice does not apply to those websites.

Our services are not intended for and should not be accessed by individuals under 16.

You have the right to request access to the personal information that we hold about you. If you wish to request that information we hold about you is amended or deleted, or wish to raise any other issue regarding your privacy or this notice, please contact us at: [vallancejaf@gmail.com](mailto:vallancejaf@gmail.com)

**Ethical Policy**

In the interests of best practice, personal opinion should not influence investment policy in case it is to the detriment of the value of the portfolio and consequently the work of the Trust.

## **Investment Policy**

Investments are managed on the Trustees' behalf by an investment manager, JM Finn & Co Limited, authorised and regulated by the Financial Conduct Authority.

Investment objectives are regularly reviewed and the investment manager prepares quarterly and annual reports for the Trustees and attends meetings of the Trustees.

The Trustees have approved a medium risk profile for the investment portfolio with the twin objectives of maintaining the capital value of the charity's assets and generating income available for grants.

The Trustees currently have a policy to award total annual grants in excess of total annual investment income to ensure that the charity meets demand for activities which support its aims. This policy is reviewed at each meeting of Trustees.

The investment policy is reviewed annually.