

Sisters of Support CIC – Cookie Policy

1. What are cookies?

Cookies are small text files placed on your device (computer, smartphone, tablet) when you visit a website. They help the site function properly, improve user experience, and provide information to the website owners.

2. Types of cookies we use

We use the following types of cookies:

- Strictly Necessary Cookies – Essential for our website to work (e.g., enabling navigation, security). These cannot be switched off.
- Performance & Analytics Cookies – Collect anonymous information about how visitors use our website (e.g., which pages are most visited). We use this to improve the site.
- Functionality Cookies – Remember your preferences (e.g., language settings, form inputs) to provide a better user experience.
- Third-Party Cookies – Some content on our site (e.g., embedded social media feeds or videos) may set cookies controlled by third parties. We do not control these cookies.

3. Cookies we use directly

Examples include:

- Session cookies to keep the website running while you browse.
- Analytics cookies (e.g., Google Analytics) to understand how our website is used.

4. How we obtain consent

When you first visit our website, you will see a cookie banner asking for your consent to non-essential cookies (analytics, functionality, third-party).

- You can accept all, reject all, or manage your cookie preferences.
- Strictly necessary cookies do not require consent.

5. Managing cookies

You can change your cookie preferences anytime using the banner or by adjusting your browser settings. Most browsers let you block or delete cookies, but some parts of the site may not work properly if you do.

Guidance for popular browsers:

- Chrome: <https://support.google.com/chrome/answer/95647>
- Edge: <https://support.microsoft.com/help/4027947>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>

6. Updates to this policy

We may update this Cookie Policy from time to time. Any changes will be posted on this page with a new “last updated” date.

7. Contact us

If you have any questions about this Cookie Policy or our use of cookies, please contact us:

Email: info@sistersofsupport.co.uk

Address: Sisters of Support CIC, Suite 18, Blue Bridge Centre, St Cuthberts Way, Newton Aycliffe, Co Durham, DL5 6DS

Telephone: 01325 965378

Data Retention and Secure Disposal Policy

1. Purpose and Scope

This policy sets out how Sisters of Support CIC manages the retention and disposal of records in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant legislation. It applies to all records and data held by the organisation, whether in paper or electronic form.

2. Retention Principles

- Records are only retained for as long as necessary to fulfil legal, contractual, operational, or funding requirements.
- Specific retention periods are defined in the organisation's Data Retention Schedule.
- Records are reviewed regularly to ensure they are not kept longer than required.
- Where possible, personal data will be anonymised once it no longer needs to be identifiable.

3. Secure Storage of Records

The organisation ensures all records are stored securely throughout their lifecycle:

- Paper records are kept in locked filing cabinets or offices with restricted access.
- Electronic records are protected by password controls, encryption, and access restrictions.
- Access to records is limited to authorised staff and volunteers only.

4. Secure Disposal of Records

When records reach the end of their retention period, they will be disposed of securely to prevent unauthorised access:

- Paper records: shredded using cross-cut shredders or destroyed by an approved confidential waste contractor.
- Electronic records: permanently deleted from systems, devices, and where feasible, backups. Secure deletion tools or overwriting methods will be used to ensure data cannot be recovered.
- Hardware and storage media: securely wiped to industry standards or physically destroyed before disposal.
- Disposal actions should be documented where appropriate to provide an audit trail.

5. Responsibilities

The Data Protection Lead (or appointed responsible person) is accountable for ensuring compliance with this policy and the retention schedule. They are responsible for:

- Ensuring records are reviewed and disposed of when retention periods expire.
- Overseeing secure storage and access controls.
- Maintaining an audit trail of disposal actions where required.
- Providing staff and volunteers with guidance on retention and secure disposal practices.

6. Review and Updates

This policy and the associated Data Retention Schedule will be reviewed annually, or sooner if there are changes in legislation, regulatory requirements, or organisational needs.

Updates will be approved by the Board of Directors/Steering Group.

Note: All records listed in the Data Retention Schedule will be securely destroyed or anonymised once their retention period ends, in line with this policy.

Document 3: Sisters of Support Confidentiality policy .docx

Sisters of Support Confidentiality Policy

Purpose

This policy outlines Sisters of Support's approach to maintaining confidentiality, ensuring that sensitive information is handled with care and in compliance with relevant UK laws, including the Data Protection Act 2018 and the UK GDPR.

1. Scope

This policy applies to all trustees, employees, contractors, volunteers, and anyone acting on behalf of Sisters of Support. It covers the handling of all confidential information, including but not limited to:

Personal information about employees, volunteers, clients, and service users.

Financial information.

Strategic plans and business operations.

Any other sensitive or proprietary information.

2. Definition of Confidential Information

Confidential information refers to any information that is not publicly available and is disclosed to or acquired by individuals in the course of their involvement with Sisters of Support.

Examples include:

Personal data such as names, addresses, contact details, and medical information.

Financial records or donor details.

Internal documents, reports, and communications.

3. Responsibilities

All individuals covered by this policy are expected to:

Treat all confidential information as private and sensitive.

Only access confidential information necessary for their role.

Ensure information is stored securely, whether electronically or physically.

Refrain from discussing confidential information in public spaces or with unauthorised individuals.

Comply with all applicable laws and organisational policies.

4. Disclosure of Confidential Information

Confidential information may only be shared with:

Authorised personnel within Sisters of Support.

External parties where there is a legal obligation to disclose, such as law enforcement or regulatory bodies.

Before disclosure to third parties, explicit consent must be obtained from the relevant individual(s), unless legally required otherwise.

5. Data Protection Compliance

Sisters of Support adheres to the principles of the UK GDPR and the Data Protection Act 2018. Personal data will be:

Processed lawfully, fairly, and transparently.

Collected for specified, explicit, and legitimate purposes.

Stored securely and retained only for as long as necessary.

6. Breaches of Confidentiality

Any suspected breach of confidentiality must be reported immediately to The Directors of Sisters of Support. Breaches may result in:

Disciplinary action for employees or volunteers.

Termination of contracts with third-party contractors.

Legal action, depending on the severity of the breach.

7. Training and Awareness

All individuals will receive training on confidentiality and data protection policies as part of their induction and ongoing development.

8. Policy Review

This policy will be reviewed annually or as required to ensure it remains compliant with UK law and organisational needs.

Approval and Effective Date

Approved by: Amy Turner

Effective Date: 28/01/25

Document 4: Sisters of Support Equality Policy.docx

Sisters of Support Equality and Diversity Policy

Aims

Sisters of Support (S.O.S.) is open to all women struggling with mental health issues. We aim to help the members to have an atmosphere of friendship, respect and care for each other. We aim to treat every member equally, regardless of their age, disability, marriage or civil partnership, pregnancy or maternity, race, religion or belief, or sexual orientation.

Accessibility

All our meetings and events are held in venues that are accessible to wheelchair users. When we organise outings for our members, we provide free places for carers of members who can only attend if they bring a carer. We are committed to ensuring any member of S.O.S. can attend our activities, so we will reassess our access requirements to meet the needs of new members.

Diversity

We aim to organise a range of events and activities to suit the interests and meet the needs of a wide variety of members. S.O.S. should be open to new ideas, and particularly prioritise opportunities for members to share their cultural heritage with one another.

Inclusion and respect

Every member of S.O.S. should be made to feel equally welcome and included at all S.O.S. meetings and events. Sexist, racist, homophobic, transphobic or otherwise offensive and inflammatory remarks and behaviour are not acceptable. These constitute harassment, and have no place in S.O.S.

Dealing with discrimination and harassment

If any members feels they have been discriminated against by S.O.S. or harassed at S.O.S. event they should raise this with the committee. The committee will investigate the complaint, listening to all members involved. (If the complaint is against a committee member, that member will not be part of conducting the investigation).

If the complaint is against a particular individual, this person will have the opportunity to express their point of view, accompanied by a friend. The person making the complaint will also have this opportunity.

If the complaint is against S.O.S. as a whole, the Committee must work to ensure that such discrimination is not repeated in the future, and must inform the members of how they propose to do this.

Any decision to exclude a person from S.O.S. due to discriminatory or harassing behaviour will be made with reference to the charity's constitution. S.O.S. will support people who feel they have been harassed or discriminated against, and will not victimise or treat them less well because they have raised this.

Bullying and harassment policy

Sisters of Support (SOS) is committed to providing an environment that is free of harassment and bullying, and where everyone is treated, and treats others, with dignity and respect. The Charity will not permit or condone any form of bullying or harassment.

This policy covers bullying or harassment of or by anyone engaged to work at the Charity, and also by third parties such as users or suppliers. The policy encompasses bullying or harassment that occurs in the group, and also out of the group, such as on business trips or at related social events.

What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. A single incident of this nature can amount to harassment if sufficiently serious.

Unlawful harassment may involve sexual harassment, or it may be related to any other of the Protected Characteristics such as age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. The Charity's stance is that harassment is unacceptable, whether or not it is targeted at any of these categories.

Examples of harassment may include (but are not limited to) the following:

Display or circulation of sexually suggestive material or material with racial overtones;

Use of slang names for racial groups, or age groups, or for disabled persons;

Professional or social exclusion;

Unwanted physical conduct, such as touching, pinching, pushing and grabbing;

Unwelcome sexual advances or suggestive behaviour;

Offensive emails, text messages or social media content.

It is important to note that harassment occurs even if the harasser perceives his/her behaviour as being harmless and without malice, or 'just a bit of fun'. What matters is how the behaviour makes the recipient feel, and not what the perpetrator's intentions were. Also, a person may be harassed even if they were not the intended 'target' of the behaviour. For example, a man may be harassed by sexist jokes about women if the jokes create an environment that is offensive to him.

What is bullying?

Bullying is a sustained form of psychological abuse. It is defined as offensive, intimidating, malicious or insulting behaviour, involving the abuse or misuse of power, which has the purpose or effect of belittling, humiliating or threatening the recipient.

Bullying usually takes one of three forms: physical, verbal or indirect. It can range from extreme forms such as violence and intimidation, to less obvious actions, such as professional or social exclusion.

Examples of bullying may include (but are not limited to) the following:

Shouting or swearing at people in public or private;

Spreading malicious rumours;

Inappropriate derogatory remarks about someone's performance;

Physical or psychological threats;

Constantly undervaluing effort;

Rages, often over trivial matters;

Ignoring or deliberately excluding people;

Overbearing and intimidating levels of supervision;

Deliberately sabotaging or impeding work performance.

Please note that facilitator's are duty-bound to give their members feedback and to generally manage their performance. Legitimate, reasonable and constructive criticism of a member's performance or behaviour, or reasonable instructions given to a member in the course of their time with us, will not amount to bullying on their own.

What to do if you are being harassed or bullied

Informal approach

You may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting, so an informal discussion may help them to understand the effects of their behaviour and agree to change it.

If you feel able to, tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately. You should keep a note of the date and what was said and done. This will be useful if the unacceptable behaviour continues and you wish to make a formal complaint.

If this is too difficult for you, then please talk to a facilitator, or a trustee, for advice and assistance. They may for example speak to the person concerned on your behalf, or accompany you when you speak to them.

If the informal approach is not appropriate, or has not been successful, you should raise a formal grievance.

Formal procedure

When a member feels that they need to deal with an issue of harassment or bullying formally, they should do so according to the Chairty's grievance procedure.

We will investigate complaints in a timely, confidential and sensitive manner. The investigation will be conducted where possible by someone with appropriate seniority and experience, and no prior involvement in the complaint. Details of the investigation, and the names of the people involved, will only be disclosed on a 'need to know' basis. We will consider whether any steps are necessary to manage the ongoing working relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform both parties (separately) of our decision. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

Consequences of a breach of this policy

If after due investigation we consider that a team member has been harassed or bullied by an employee the matter will be dealt with under the disciplinary procedure as a case of possible misconduct or gross misconduct. The person concerned may be suspended during the disciplinary investigation until any eventual disciplinary proceedings have been concluded. If the complaint of bullying or harassment is upheld, a disciplinary penalty may be imposed up to and including dismissal, depending on the seriousness of the offence and all relevant circumstances.

Some bullying or harassment will constitute unlawful discrimination if it relates to any of the Protected Characteristics as detailed above. Such behaviour could constitute a criminal offence, punishable by a fine and/or imprisonment.

Where it is found that a member has been harassed by a third party, such as a user, supplier or independent contractor, the Charity will take such steps as are reasonably practicable to prevent any recurrence.

If someone makes a complaint which is not upheld, and the Charity has good grounds for believing that the complaint was not made in good faith, the Charity will take disciplinary action against the person making the false complaint.

Protection and support for those involved.

Members who make complaints in good faith, or who participate in any investigation must not suffer any form of retaliation or victimisation as a result. Any employee engaged in retaliation will be subject to disciplinary action.

Record-keeping

Information about a complaint by or about a member may be placed on either party's personnel file, along with a record of the outcome and any other notes or documents compiled during the process. These will be processed in accordance with our Data Protection policy.

How to stop bullying and harassment

We all have a shared responsibility to help create and maintain an environment free of bullying and harassment. You can do this by:

Considering how your own behaviour may affect others, and changing it;

Being receptive, rather than defensive, if asked to change your behaviour;

Treating your colleagues with dignity and respect;

Taking a stand if you think inappropriate jokes or comments are being made;

Making it clear to others when you find their behaviour unacceptable;

Intervening, if possible, to stop harassment or bullying, and giving support to victims;

Reporting harassment or bullying to your manager or another appropriate officer of the Chairty;

Being open, honest and objective in any investigation of complaints.

This policy was adopted at a meeting of S.O.S. and will be reviewed at least every 2 years.

Sisters Of Support Data Protection Policy

1) Definitions

Personal data is information about a person which is identifiable as being about them. It can be stored electronically and/or on paper and includes images and audio recordings as well as written information.

Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

2) Responsibility

Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.

All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.

3) Overall policy statement

Sisters of Support (S.O.S.) needs to keep personal data about its committee, members, volunteers and supporters in order to carry out group activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the UK General Data Protection Regulation (GDPR) and other relevant legislation.

We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

We will only collect, store and use data for:

purposes for which the individual has given explicit consent, or

purposes that are in our group's legitimate interests, or

contracts with the individual whose data it is, or

to comply with legal obligations, or

to protect someone's life, or

to perform public tasks.

We will provide individuals with details of the data we have about them when requested by the relevant individual.

We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.

We will endeavour to keep personal data up-to-date and accurate.

We will store personal data securely.

We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.

We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.

We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

Data protection procedures

1) Introduction

Sisters of Support (S.O.S.) has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases, we will ensure our Data Protection Policy is upheld.

2) General procedures

Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third-party website (e.g. Google Drive) we will ensure the third party comply with the UK GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.

When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.

We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

3) Mailing list

We will maintain a mailing list. This will include the names and contact details of people who wish to receive, publicity and fundraising appeals from Sisters of Support.

When people sign up to the list, we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give separate consent to receive publicity and fundraising messages and will only send them messages which they have expressly consented to receive.

We will not use the mailing list in any way that the individuals on it have not explicitly consented to.

We will provide information about how to be removed from the list with every mailing.

We will use mailing list providers who store data within the EU.

4) Supporting individuals

From time to time, individuals contact the Group to ask us to help them resolve an issue they are having with the council, relating to their housing or other local services.

We will request explicit, signed consent before sharing any personal details with the council or any other relevant third party.

We will not keep information relating to an individual's personal situation for any longer than is necessary for the purpose of providing them with the support they have requested.

Personal data relating to issues will be stored securely by a member of the committee, and not shared among the rest of the committee or with other volunteers unless necessary for the purpose of providing the support requested.

Details relating to individual's circumstances will be treated as strictly confidential.

5) Photography

We may make and/or sell products featuring photos of the members, to help raise money for the group or for promotional use.

Anyone not wanting their photos used should make us aware so we can ensure to not use their image.

If a member changes their mind, they can let us know and we will discontinue using their image or ensure to cover them.

If products/ documents have already been printed these will be used until they are gone, and their image will not be used on future items.

6) Contacting volunteers

Local people volunteer for Sisters of Support in a number of ways.

We will maintain a list of contact details of our recent volunteers. We will share volunteering opportunities and requests for help with the people on this list.

People will be removed from the list if they have not volunteered for the group for 12 months.

When contacting people on this list, we will provide a privacy notice which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.

To allow volunteers to work together to organise for the group, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

7) Contacting committee members

The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.

Trustee's contact details will be shared among the committee.

Trustee members will not share each other's contact details with anyone outside of the committee or use them for anything other than Sisters of Support (S.O.S.) business, without explicit consent.

8) Review

These procedures will be reviewed every two years.

Document 6: Sisters of Support Gifting policy .docx

Sisters of Support Gift Acceptance Policy

Purpose

This policy outlines the principles and procedures for accepting gifts and donations to ensure compliance with legal requirements, alignment with organisational values, and protection of the integrity and reputation of Sisters of Support (S.O.S).

Scope

This policy applies to all trustees, staff, volunteers, and agents acting on behalf of Sisters of Support (S.O.S).

1. Principles for Accepting Gifts

Sisters of Support (S.O.S) will:

Accept gifts that align with its mission, values, and objectives.

Reject gifts if acceptance would compromise its reputation, independence, or financial stability.

Ensure compliance with UK charity law, including due diligence on the sources of gifts.

Gifts We Accept

Monetary donations (cash, cheques, bank transfers).

Legacies and bequests.

Grants from trusts, foundations, or corporations.

Non-cash gifts, including property, shares, or in-kind services, subject to review.

Gifts We Do Not Accept

Gifts derived from illegal or unethical activities.

Gifts that impose conditions conflicting with Sisters of Support (S.O.S) mission or operational capabilities.

Any gift creating an actual or perceived conflict of interest.

2. Gift Review and Approval

All significant gifts (e.g., over £15.00) will be reviewed by the Directors to ensure compliance with this policy.

3. Donor Recognition

Sisters of Support (S.O.S) will recognise and thank donors in a manner consistent with their preferences, while respecting donor anonymity where requested.

Naming opportunities or public acknowledgment will be at the discretion of Sisters of Support (S.O.S).

4. Declining Gifts

Sisters of Support (S.O.S) reserves the right to decline any gift that:

Contravenes this policy.

Would impose undue financial or operational burden.

Poses a risk to the organisation's integrity or reputation.

5. Transparency and Accountability

Sisters of Support (S.O.S) will maintain accurate records of all gifts received, ensuring compliance with financial and reporting requirements.

Due diligence will be conducted for gifts above £15.00

6. Policy Review

This policy will be reviewed annually by the Directors to ensure its continued relevance and effectiveness.

Approval and Effective Date

Approved by: Carrie Howarth

Effective Date: 28/01/25

Document 7: Sisters Of Support Health&Safety Police .docx

Sisters of Support Health and Safety policy

Statement of intent

The policy of Sisters of Support (S.O.S.) is to provide and maintain safe and healthy working conditions and environment for all our volunteers and users, plus any other people who are directly affected by our activities, such as members of the public at our events.

Responsibility

Overall and final responsibility for health and safety at all events and activities organised by S.O.S. lies with the management committee. This responsibility will be delegated to a named volunteer for each event or activity. This volunteer will be responsible for ensuring that this policy is upheld.

For our biweekly meetings the responsible person is Tina Hynes

For all other events the responsible person will be named in advance and their name will be noted on all relevant risk assessments. All volunteers involved will be made aware of who is responsible for health and safety.

General arrangements

The main activity of S.O.S. is to organise social activities and support for S.O.S members. A risk assessment will be carried out before every one-off event. This will include assessing risk as it relates to all aspects of the event including equipment; venue; volunteers; attendees. Appropriate precautions will be taken to minimise hazards at all events and activities.

S.O.S. may also run regular events at the same venue or using the same equipment, such as our biweekly meetings. In this case we will carry out a general risk assessment for the event/activity/equipment/venue. All general risk assessments will be reviewed at least once a year.

We will have a trained first aider present at all events which are open to the public.

We will make sure all volunteers and staff at events and activities are aware of the location of fire exits.

All volunteers and staff will be made aware of the precautions they need to take as noted on the relevant risk assessment.

No volunteer or employee will run an event or activity on their own, and at least two volunteers or employees should stay at an event until it is finished, and the last attendees have left.

S.O.S. will hold Public Liability Insurance

First aid and accidents

The First Aid Box for biweekly meeting will be available in all venues. The management committee is responsible for checking the contents every quarter.

Lead Volunteers will have up to date first aid training.

All accidents are to be recorded in the Accident Book. The book is in the first aid box.

Behaviour management

Anyone displaying abusive or violent behaviour will be asked to leave the session.

Reasonable level of risk

We will take steps to avoid unnecessary risk and very high levels of risk. However, some activities inherently involve some risk.

Review

This policy will be reviewed every year

Sisters of Support CIC – Website Privacy Notice

At Sisters of Support (“we”, “us”, “our”), your privacy is important to us. This notice explains how we collect, use, and protect your personal data when you interact with us through our website.

We act as the data controller, which means we decide how and why your personal data is used.

Data we collect

We may collect the following information when you use our website:

Personal details you provide via contact forms (such as your name, email address, and phone number).

Information about how you use our site through cookies and analytics tools (see our Cookie Policy).

How we use your data and legal bases

We only use your personal data when the law allows us to. This may include:

Responding to your enquiries (our legitimate interests in running the charity and providing services).

Sending you newsletters or updates if you have subscribed (your consent, which you can withdraw at any time).

Improving and monitoring our website (our legitimate interests in making sure our site works well and is useful).

Data sharing

We do not sell or rent your data. We may share your data with trusted service providers who help us run our website, email services, or IT systems. We make sure these providers only process your data under our instructions and with appropriate safeguards.

Some of our service providers may transfer data outside the UK/EEA. Where this happens, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses approved by the UK/EU.

Retention

We keep your personal data only for as long as necessary for the purposes we collected it:

Enquiry form submissions: normally up to 12 months after our last contact.

Newsletter subscriptions: until you unsubscribe.

Website analytics: in line with our Cookie Policy.

Cookies

We use cookies to enhance your experience and understand how our site is used. Non-essential cookies will only be set if you give your consent. For details, please see our Cookie Policy.

Your rights

You have the following rights under UK data protection law:

To access the personal data we hold about you.

To correct inaccurate or incomplete data.

To request deletion of your data, in certain circumstances.

To restrict or object to how we use your data.

To request a copy of your data in a portable format.

To withdraw consent where we rely on it (e.g. newsletters).

If you want to exercise any of these rights, please contact us using the details below.

Contact us

If you have any questions about this notice or how we handle your data, please contact:

Data Controller

Sisters of Support

Email:

Address: Suite 18 BLUE BRIDGE CENTRE, St Cuthberts Way, Newton Aycliffe, Co Durham, DL5 6DS

You also have the right to complain to the Information Commissioner's Office (ICO) if you are unhappy with how we handle your data: .

Sisters of Support CIC – Members Privacy Notice

At Sisters of Support CIC (“we”, “us”, “our”), your privacy is very important to us. This notice explains how we collect, use, and protect the personal information we hold about you as a member.

We are the data controller, which means we decide how and why your personal information is used.

The information we collect

Depending on your relationship with us, we may collect:

Contact details: name, address, phone number, email.

Personal details: date of birth, emergency contact, living or work situation.

Health information (special category data): medical conditions, allergies, dietary needs, disabilities, care requirements. Providing health information is always optional, but it helps us support your wellbeing.

Membership and service use information: attendance, service history, support needs, meeting notes, decisions made.

Consent records: photography/video permissions and agreement to group rules.

Images and recordings: photos, videos, or other recordings (only with your consent).

Compliments and complaints: feedback you provide, including complaints or safeguarding concerns.

Donations and fundraising: name, contact details, and accessibility information if required.

Website use: cookies, browsing behaviour, and user journeys.

How we use your information

We only use your personal data where the law allows us. This includes:

Managing your membership and participation in our groups.

Providing tailored support and accommodating health needs.

Safeguarding and protecting your wellbeing.

Communicating with you about activities, appointments, services, and updates.

Taking and using photos/videos for newsletters, reports, social media, or other publicity (with your consent).

Processing donations and organising fundraising activities.

Responding to enquiries, feedback, or complaints.

Monitoring and improving our website and services.

Our lawful bases

Under UK data protection law, we rely on:

Contract: to provide membership or services you have requested.

Consent: for marketing, photos/videos, and collecting health details. You can withdraw consent at any time.

Legitimate interests: to run and improve our services in ways that benefit members.

Vital interests: where it is necessary to protect your life or wellbeing in an urgent situation.

Legal obligation: for safeguarding, tax, and regulatory reporting.

Who we share information with

We do not sell your data. We may share it only when necessary, with:

Health and care providers (e.g., GPs, support services).

Local authorities, regulators, or emergency services (e.g., safeguarding).

Partner charities or voluntary organisations working with us.

Service providers who help us deliver our services (e.g., IT, email, event systems).

Some providers may process data outside the UK/EEA. Where this happens, we use safeguards such as Standard Contractual Clauses.

How long we keep your data

We keep your personal information only as long as necessary:

Membership/service records: duration of membership plus up to 1 year afterwards (longer if required for safeguarding or legal reasons).

Health information: only while you are an active member and deleted once no longer needed.

Photos/videos: until you withdraw consent or request deletion.

Complaints/incidents: kept in line with legal or insurance requirements.

Fundraising/marketing information: until you unsubscribe or withdraw consent.

Your rights

You have the following rights under UK data protection law:

To access the personal data, we hold about you.

To correct inaccurate or incomplete information.

To request deletion of your data (in certain circumstances).

To restrict or object to how we use your data.

To request a copy of your data in a portable format.

To withdraw consent at any time (for health data and photos/videos).

Contact us

If you have any questions about this notice or how we use your personal data, please contact:

Data Controller

Sisters of Support CIC

info@sistersofsupport.co.uk

Suite 18, Blue Bridge Centre, St Cuthberts Way, Newton Aycliffe, Co Durham, DL5 6DS

If you are unhappy with how we handle your data, you can also complain to the Information Commissioner's Office (ICO): .

Sisters of Support CIC – Volunteers Privacy Notice

At Sisters of Support (“we”, “us”, “our”), your privacy is very important to us. This notice explains how we collect, use, and protect the personal information we hold about you as a member.

We are the data controller, which means we decide how and why your personal information is used.

The information we collect

We may collect and store the following information about you:

Personal details – name, contact details, date of birth, emergency contacts.

Recruitment information – application forms, CVs, references, interview notes.

Training and participation records – training completed, attendance, role activity.

Health and safeguarding information – where necessary to ensure safety and wellbeing.

Consent records – e.g. permission for photographs or videos.

How we use your information and our legal bases

We use your information for the following purposes:

Recruitment and role management (contractual necessity, legitimate interests).

Ensuring safety and wellbeing, including safeguarding checks (legal obligation, vital interests, or explicit consent for health data).

Communicating with you and providing support (legitimate interests).

Using photos or videos in promotional materials (only with your explicit consent).

Sharing your information

We may share your personal information with:

Statutory bodies where required by law (e.g., Disclosure and Barring Service for checks, safeguarding authorities).

Trusted service providers who support our IT, email, or HR systems.

We do not sell your data and will not share it without your consent unless required by law. Some service providers may store data outside the UK/EEA. Where this happens, we ensure appropriate safeguards (such as Standard Contractual Clauses) are in place.

Retention

We keep your personal information only as long as necessary:

Volunteer records: for the duration of your volunteering and up to 2 years afterwards (to meet legal, safeguarding, or insurance requirements).

Health and safeguarding information: only for as long as it is required for your safety and legal obligations.

Photos/videos: until you withdraw consent.

For more detail on retention, please contact us.

Your rights

You have the following rights under UK data protection law:

To access the personal data we hold about you.

To correct inaccurate or incomplete information.

To request deletion of your data, in certain circumstances.

To restrict or object to how we use your data.

To request a copy of your data in a portable format.

To withdraw consent at any time (for health data and photos/videos).

If you want to exercise any of these rights, please contact us.

Contact us

If you have any questions about this notice or how we use your personal data, please contact:

Data Controller

Sisters of Support

Email:

Address: Suite 18 BLUE BRIDGE CENTRE, St Cuthberts Way, Newton Aycliffe, Co Durham,
DL5 6DS

If you are unhappy with how we handle your data, you can also complain to the Information Commissioner's Office (ICO): .

Document 9: Sisters of Support Risk Assessment .docx

Sisters of Support Risk Assessments

Venue

Community Space risk assessment

Equipment

Coffee morning kettle risk assessment

Sisters Of Support Safeguarding Policy

1. Purpose of the policy

Sisters of Support (S.O.S.) is committed to safeguarding practices that help ensure the safety of adults at risk whilst taking part in our group activities and in the wider community. This policy helps everyone involved in our group:

be aware of our legal responsibilities.

understand the safeguarding risks in Sisters of Support (S.O.S.)

know what to do if they have a concern about the wellbeing or welfare of any adult at risk that comes into contact with our group.

This safeguarding policy, and associated procedures, applies to all individuals involved in Sisters of Support (S.O.S.), including trustees, members and volunteers. The policy applies to all concerns about the safety of adults at risk while taking part in our group and the activities we run, or while in the wider community.

2. Code of conduct

When working with vulnerable adults we are acting in a position of trust. We recognise that keeping our group safe is everyone's responsibility, and we expect our members, volunteers, staff and trustees to behave according to the following values:

All adults at risk have an equal right to protection from abuse and to be kept safe from harm regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

We recognise some adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

We listen to and respect everyone in the group.

We use language that is appropriate for age and ability, and not offensive or discriminatory.

We encourage a culture of honesty, where everyone feels comfortable to point out attitudes or behaviours they do not like.

We know it isn't always easy to be vocal about concerns – for ourselves or for other people.

All allegations and suspicions of neglect and abuse will be taken seriously and responded to swiftly and appropriately.

This means when working with adults at risk, we will never:

Promise to keep secrets – safeguarding relies on sharing concerns appropriately with other agencies.

Allow suspicions or allegations of abuse or neglect to go unreported

Act in a way that is threatening, abusive or bullying

Jump to conclusions about others without checking facts

Enter into a sexual or intimate relationship with an adult at risk

3. Legislation

Sisters of Support (S.O.S.) recognises that the local authority has the main legal duty to safeguard adults at risk, and we are committed to working with them and our local Safeguarding Adults Board.

This policy, and the practices within it, are based on the relevant legislation and government guidance, including:

The Care Act 2014; and

The Mental Capacity Act 2005 (which protects people's right to make their own decisions in any situation where they are able to do so).

We base our practices on the principles laid out in the Care Act 2014 i.e.

Empowerment – People being supported and encouraged to make their own decisions and informed consent.

Prevention – It is better to take action before harm occurs.

Proportionality – The least intrusive response appropriate to the risk presented.

Protection – Support and representation for those in greatest need.

Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

Accountability – Accountability and transparency in delivering safeguarding.

4. Definitions

According to the Care Act 2014 (applicable in England):

An adult at risk is an individual aged 18 years and over who:

has needs for care and support (whether or not the local authority is meeting any of those needs) AND;

is experiencing, or at risk of, abuse or neglect, AND;

as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Abuse is a violation of an individual's human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any or all of the following types of abuse may be perpetrated as the result of deliberate intent, negligence, omission or ignorance. Often the perpetrator of abuse is known to the adult and may be in a position of trust and power.

The types of abuse we need to be aware of are:

Physical

Sexual

Emotional/Psychological/Mental

Neglect and acts of omission

Financial or material abuse

Discriminatory

Organisational / institutional

Self-neglect

Domestic abuse (including coercive control)

Modern slavery

5. Recognising safeguarding concerns

There are many signs and indicators that may suggest someone is experiencing abuse or neglect. There may be other explanations too, but Sisters of Support (S.O.S.) will not ignore any of these signs if they are apparent.

An adult may confide (disclose) to a trustee, volunteer, or other member of Sisters of Support (S.O.S.) that they are experiencing abuse, inside or outside the activities of the group. Or someone else may notice signs in a particular individual. The signs we will look out for include:

Unexplained bruises or injuries

Belongings or money going missing from the person

The person no longer attending or enjoying Sisters of Support (S.O.S.) activities, or responding to contact from other members of the group

A change in confidence or behaviour of a person e.g. if they are withdrawn and quiet around a particular person or people, when usually they are outgoing and confident.

A change in appearance of the person e.g. losing or gaining weight, deterioration in personal hygiene or way of dressing.

Someone else (e.g. a parent, carer or family member) always speaking for the person and not allowing them to make their own choices

The person showing fear of, or not wanting to be around, a particular individual or group of people

6. Responding to concerns

Sisters of Support (S.O.S.) has a designated safeguarding lead whose contact details are in section 11.

Sisters of Support (S.O.S.) recognises that it can be difficult for many reasons to speak up if you think someone is being abused or neglected. However, we expect our volunteers, trustees, and staff to take action in response to any concerns. Our safeguarding lead will support the person raising the concerns, as well as the person being abused.

If anyone in the group notices any signs of abuse or neglect in another person, they should bring these concerns to the safeguarding lead.

If someone discloses to anyone else in the group that they are being abused, the response should be as follows:

Always make sure the person speaking up feels they are being listened to and supported

Don't promise to keep information confidential between you and them

Tell the designated safeguarding lead about the concerns (unless the safeguarding lead is implicated in causing the harm or perpetrating the abuse. In this situation, information should be shared with a trusted committee member/trustee and they will be responsible for taking further action instead of the safeguarding lead)

Ask for the person's consent to share the information. If they refuse and you are still worried that they or someone else is at immediate risk of harm, you cannot wait for this consent. You must share this information with the safeguarding lead.

Write a clear statement of what you have been told, seen, or heard

The is responsible for taking further action once concerns have been raised with them. Throughout the process, the safeguarding lead will record all the information they are given, the actions they take, and why. The procedures they will follow are:

6.1 Initial assessment

As soon as information is shared with the safeguarding lead, they will make an initial assessment of the concern. They will, if possible, talk to the person reporting the concern and gather as much information as possible from them.

Key questions to ask:

What type of concern has been reported? Different actions are required depending on what type of concern it is (see below)

What action has already been taken?

Is anyone else in the organisation affected by this situation (e.g. other volunteers or those you work with)? Are there any attitudes or emotions that you may have to be aware of?

How might this concern affect what the organisation delivers in the short term?

Who else might need to be informed?

What other actions now need to be taken?

6.2 Immediate actions depending on what type of concern has been raised

(a) Emergency incidents: this is when there's a life-threatening situation where there's imminent danger and harm to an adult, young person or child.

Immediately contact the emergency services if they haven't been called already.

Make sure the current situation is safe.

Establish how others are coping – do they need any immediate support?

Inform the senior people in the group

(b) Protection concerns: This is when an adult who you believe is unable to protect themselves is at current risk of, or has experienced, abuse or harm.

If the person is in immediate danger, call the police.

If they're not in immediate danger, you must contact the local authority safeguarding team within 24 hours and make a referral (contact details are in section 10).

Be guided by the safeguarding team or police on any further actions required of you.

(c) Allegations concerning staff or volunteers: this is when someone has alleged that staff or volunteers from your organisation have harmed or abused an adult at risk.

Contact the local authority safeguarding team as soon as possible within 24 hours.

Be guided by them on any further actions required of you.

(d) Welfare concerns: This is when no one has been harmed in any way, but a person shows signs of being in need. It's when you have concerns for their health, wellbeing or safety if they don't get help.

Within 7 days you, or someone in your organisation, should speak with the person. When it is appropriate you should also speak with their family or carer. You must explain your concerns and make sure they have the support they need.

Depending on the conversation, the safeguarding lead may then also:

- Help the person or their family access services or give them the information they need to do this themselves.

- Speak to another professional who is already working with the person or family, such as a social worker, about their needs.

(e) Concerns about other organisations: This is a situation where the safeguarding concern is about another organisation, their staff, volunteers or the people they work with.

As soon as possible within 24 hours contact the designated safeguarding lead of the organisation in question and pass on your concerns, if this has not already happened.

In some circumstances you may decide to follow up with the organisation to confirm they have acted on the issue.

If at any point you think the organisation has not acted and someone is at risk, you should contact the local safeguarding team yourself.

(f) Responding to historic or non-recent concerns: You may become aware or be told about a concern from an adult relating to an incident which took place in the past, including when

they were a child. Historical allegations of abuse should be taken as seriously as contemporary allegations.

Remember that it's never too late to report abuse. An individual can make a formal complaint to the police about non-recent abuse, ideally in the geographic area in which the abuse is reported to have taken place.

Establish if the person alleged to have caused the harm works with children or adults at risk. Try to find out their recent or current whereabouts and any contact they have with children or adults at risk. A referral should be made to social services, with the consent of the person who experienced the abuse if possible.

Consider what consent the person has given for information to be shared. How, when and to whom they share this information should usually be with their consent.

Signpost the person who experienced the abuse to relevant support groups that can help them.

(g) Supporting those who share a concern with you: Your primary concern should be the best interests of the person who is at risk of harm. However, the person sharing this concern with you may also be distressed by the situation, even if they are reporting on behalf of someone else. Everyone can respond to worries about another differently. If someone has previously experienced trauma they can find it especially upsetting.

Thank them for bringing this concern to your attention and that they have fulfilled their key responsibility

Explain that you will now take responsibility in leading management of this concern and any contact with statutory agencies

Highlight that there may be limited updates that you have or can give them on the situation; that does not mean that it was not important for them to share their concern

Remind them of the importance of confidentiality and not sharing this information further

Ensure they have your contact details in case they think of anything else they have not yet shared that they think may be relevant

Discuss with them what additional support they may require. Consider contacting them later to check in on how they are doing

7. Keeping records

Sisters of Support (S.O.S.) recognises that it is vital to record and store details about any safeguarding concerns that arise. We will record information, even if the concerns have not been shared with the police or the local authority safeguarding team. These records are extremely sensitive and will be kept in a locked cabinet or drawer (if hard copy) and/or password protected and stored on a computer with protection against hackers and viruses (if electronic).

It is the responsibility of the designated safeguarding lead to ensure that the following information is recorded about every safeguarding concern:

The date and time of the incident/disclosure/concern

The date and time of the report

The name and role of the person to whom the concern was originally reported and their contact details

The name and role of the person making the report (if this is different to the above) and their contact details

The names of all parties who were involved in the incident, including any witnesses

The name and any other relevant information about the adult who is the subject of the concern (including information about their care and support needs)

What was said or done and by whom

Any action taken to look into the matter

Any further action taken (such as a referral being made)

The reasons why the organisation decided not to refer those concerns to a statutory agency (if relevant)

Each record will be signed and dated by the person making the report.

8. Confidentiality, consent and information sharing

Timely information sharing is key to keeping people safe and responding appropriately to concerns about their welfare. In general, Sisters of Support (S.O.S.) expects all committee members, volunteers and staff to maintain confidentiality and act in accordance with the UK General Data Protection Regulations (GDPR).

We will share information within the group (e.g. with other volunteers) in situations where this is necessary in order to deal effectively with safeguarding concerns or to provide continuity of support. We will share information with other organisations in order to keep a

person safe.

Whenever confidential information is shared, we will follow the principles below. We will:

Have a clear and legitimate purpose

Keep clear records of why we chose to share the information

Ensure we are not putting the person at risk by sharing information

Be as factual as possible

Seek consent. If the adult refuses consent, we may share information only if:

We think they are at serious risk of harm or abuse, including harming themselves;

Information indicates that a serious crime has been or is going to be committed;

We think the person lacks the mental capacity to decide for themselves and we believe it would be in the individual's best interests;

We are required by law e.g. if we suspect FGM, forced marriage, or a possible terrorist threat.

9. Recruiting and training volunteers

Sisters of Support (S.O.S.) volunteers that work with adults at risk will be given an induction which covers the safeguarding policy and procedures of the group. They will be trained in: our code of conduct; definitions of abuse and harm; recognising signs of abuse; and how to respond to concerns and disclosures. All volunteers will know who is the designated safeguarding lead, and that they should go to them with any concerns.

The designated safeguarding lead will be offered further training to ensure they are clear about their role, and what action to take in response to different concerns.

We will apply for Disclosure and Barring Service (DBS) checks for all volunteers for whom we are legally required to do so.

10. Reviewing policy and procedures

This policy and its procedures will be reviewed every 2 years.

11. Key contacts

Designated Safeguarding Lead

Name: Amy Turner

Contact details: 07847 531571

Police

Emergency, phone: 999

Non-emergency, phone: 101

Elder Abuse UK Helpline
Phone for advice: 080 8808 8141

National Domestic Violence Helpline
Freephone, 24 hours a day, for advice: 0808 2000 247

Durham County Council Social Care Direct
03000 267979

Durham Safeguarding Adults Partnership
Adult and Health Services
Room 2/37
County Hall
Durham
DH1 5UL

Document 11: Sisters of Support Whistle Blowing policy .docx

Sisters of Support Whistleblowing Policy

The charity is committed to being open, honest and accountable. It encourages a free and open culture in its dealings between the Trustees and those working with the charity, both employees and volunteers. This policy aims to help the Trustees and employees/volunteers to raise any serious concerns they may have about colleagues or their employer with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result. It is written in the context of the Public Interest Disclosure Act 1998 which protects employees who 'blow the whistle' on malpractices within their organisation.

What types of concerns?

The policy is intended to deal with serious or sensitive concerns about wrongdoings such as the following:

- ✓ a criminal offence
- ✓ a failure to comply with any legal obligation
- ✓ a failure in the protection of children or vulnerable adults
- ✓ a miscarriage of justice
- ✓ a health and safety risk to an individual
- ✓ damage to the environment
- ✓ or concealment of the above.

It is not necessary for individuals who raise the concern to prove the wrongdoing that is alleged to have occurred or is likely to occur.

However if an individual knowingly or maliciously makes an untrue allegation (eg: in order to cause disruption with The charity), The charity will take appropriate disciplinary action against them. It may constitute gross misconduct.

Individuals should note that they will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence.

This policy does not deal with any complaints staff may have about their employment. This should be dealt with through The charity's Grievance Procedure.

The charity's Bullying and Harassment policy offers protection to workers against harassment, bullying and discrimination.

Volunteers should make complaints or raise concerns through the Volunteer Complaints Procedure.

Service users should make complaints or raise concerns through the Service Users Complaints Procedure.

How to raise a concern in the workplace

The officer designated to handle whistleblowing concerns is Carrie Howarth and shall be known as the Whistleblowing Officer.

Individuals should in most cases, first report their concern to their line manager, who is expected to respond to that matter. If the relevant manager cannot deal with the matter, he or she will refer the concern to the Whistleblowing Officer.

Dependent on the seriousness and sensitivity of the matter, and who is suspected of the wrongdoing, the individual can, if necessary report directly to the Whistleblowing Officer. If the matter concerns the Whistleblowing Officer, it should be raised with the Trustees. Individuals are encouraged to raise their concerns in writing where possible, setting out the background and history of their concerns (giving names, dates and places where possible) and indicating the reasons for their concerns.

Employees may wish to seek the assistance of their trade union representative before raising the concern. The trade union representative may, where the employee so desires, raise the concern on behalf of the employee. Employees may also invite a trade union representative or colleague to be present during any meetings or interviews about the concerns they have raised.

If any individual is unsure whether to use this procedure or they want independent advice at any stage, they should contact:

✓ their trade union (if applicable), or

✓ the independent charity, Public Concern at Work's legal helpline on 020 7404 6609, email:

Public Concern at Work will be able to advise on how and with whom to raise a concern about malpractice.

Disclosures made to a legal advisor in the course of obtaining legal advice will be protected under the Public Interest Disclosure Act.

If the individual reasonably believes that the matter relates wholly or mainly to the conduct of a person or body other than the charity or any other matter for which a person or body other than The charity has legal responsibility, the disclosure should be made to that other person or body.

Protecting the individual raising the concern

If an individual raises a concern which they believe to be true, The charity will take appropriate action to protect the individual from any harassment, victimisation or bullying. Employees who raise a genuine concern under this policy will not be at risk of losing their job, nor will it influence any unrelated disciplinary action or redundancy procedures.

The matter will be treated confidentially if the individual requests it and their name or position will not be revealed without their permission unless The charity has to do so by law. If in other circumstances the concern cannot be resolved without revealing the individual's identity, the Whistleblowing Officer will discuss with the individual whether and how to proceed.

Concerns raised anonymously tend to be far less effective but the Whistleblowing Officer will decide whether or not to consider the matter taking into account:

- ✓ the seriousness of the matter;
- ✓ whether the concern is believable;
- ✓ whether an investigation can be carried out based on the information provided.

How the charity will deal with the concern

How the concern will be dealt with, will depend on what it involves. It is likely that further enquiries and/or investigation will be necessary. The concern may be investigated by the charity's Whistleblowing Officer, the Trustees, through the disciplinary process or it may be referred to the police, other agencies such as Social Services, an external auditor or an independent investigator.

It may be necessary for the individual to give evidence in criminal or disciplinary proceedings. The charity will give the individual feedback on the progress and outcome of any investigation wherever possible.

If the suspicions are not confirmed by an investigation, the matter will be closed. Staff will not be treated or regarded any differently for raising the concern, and their confidentiality will continue to be protected.

General Guidance

What is Whistleblowing?

Whistleblowing, or public interest disclosure, is when a worker reports a concern about the improper actions or omissions of their colleagues or their employer which may cause harm to others or to the organisation. Obvious examples of such improper actions include theft, fraud, abuse, breaches of health & safety.

The disclosure should be made 'in good faith'. In other words the disclosure must be made out of real concern about wrongdoing. Knowingly and maliciously making false accusations for ulterior motives is not whistleblowing. The whistleblower should reasonably believe the information and allegation is substantially true, even if the information later turns out to have been incorrect.

Whistleblowing is not the same as making a complaint or raising a grievance, where the individual is saying that they have personally been poorly treated. A whistleblower is usually not directly or personally affected by the concern and therefore rarely has a direct personal interest in the outcome of any investigation into their concerns.

The whistleblower raises the concern so that others can address it. Examples of concern may include:

- ✓ an employee or volunteer defrauding the charity or anyone associated with the charity;
- ✓ the physical or emotional abuse of children, young people, vulnerable adults or the elderly;
- ✓ anyone making inappropriate use of the charity's resource (eg: for their own personal benefit);
- ✓ faulty machinery that puts at risk the safety of employees or anyone associated with the charity.

Good Practice

For effective risk management, employees need to be confident that they can raise matters of concern without suffering any detriment. Not dealing with problems early could have a devastating effect on organisations with costly fines, compensation, higher insurance premiums, damaged reputation, regulatory investigation, lost jobs, and even lost lives. Whistleblowing can be an early warning system for employers and an effective policy can provide a clear framework for action for employees and employers alike.

Following its public consultation on whistleblowing, the UK Financial Services Authority (FSA) found that:

"A whistleblowing policy will improve the trust and confidence among workers by creating what one respondent called a "culture of honesty and openness" by encouraging workers to report internally. This was seen as "good for the morale of workers", giving them confidence to come forward with concerns. Senior managers will be the first to know of any issues that they may need to address. These can be dealt with internally. This also means that the costs of investigating any problems, such as fraud, are reduced as problems can be caught quickly."

If workers voice concerns within the organisation rather than being forced to go to an external body, employers can often tackle a problem before it becomes a crisis, thus helping to avoid potentially damaging media coverage, regulatory sanctions and/or costly compensation payments. A whistleblowing policy can provide a clear framework for constructive problem solving in a reasonable, appropriate and controllable way.

Employees should not be expected to prove their case should they have a concern about malpractice. Therefore, an organisation's policy on - and response to - whistleblowing should be different from its policy on and response to a grievance.

The main points to consider within a whistleblowing policy or approach to whistleblowing at work:

- ✓ Involve workers by consulting with them, either through the trade union where present, through staff groups, or – in smaller organisations – individually, before the introducing the policy;
- ✓ Discuss the types of risk your organisation may face with your workers;
- ✓ Be clear about what conduct is unacceptable and about the standards expected of your workers;
- ✓ Encourage workers to share their concerns internally and in confidence – they do not need to have proof or need to investigate the matter themselves;
- ✓ Be clear that concerned employees will be supported and protected from reprisals;
- ✓ Explain that a whistleblower is a witness, not a complainant;
- ✓ Deal with wrongdoing seriously and effectively;
- ✓ Train managers on how to deal with whistleblowing;
- ✓ If employees feel uncomfortable raising their concern with their line manager, explain that they should then raise it at a senior level such as to a member of the Board of Directors ;
- ✓ Emphasise to managers and workers that victimisation is a disciplinary offence as is knowingly raising malicious untrue allegations;
- ✓ Offer confidentiality to any worker who asks for it but be clear that there may be circumstances when their identity might have to be revealed such as when you are ordered by court;
- ✓ Report back to employees about the progress and outcome of any enquiry or action taken;

- ✓ Be prepared to explain how you have handled the concern;
- ✓ Under no circumstances try to suppress evidence of malpractice.

The Legislation

The Public Interest Disclosure Act came into force in July 1999. It protects most workers against unfair dismissal or being subjected to any other detriment by their employer (such as denial of promotion, pay rise or training) for making disclosures about wrongdoing. It covers all employees, trainees, agency staff, contractors and homeworkers, regardless of length of service or age. However the genuinely self-employed and volunteers are not covered by the Act.

The Act encourages workers to raise concerns about malpractice – dangerous or illegal activity – in the workplace. It does not matter whether the wrongdoing takes place in the United Kingdom or abroad. In order for it to be a ‘qualifying disclosure’ under the Act, the whistleblower should reasonably believe that there is

- ✓ a criminal offence
- ✓ a failure to comply with any legal obligation
- ✓ a miscarriage of justice
- ✓ a health and safety risk to an individual
- ✓ damage to the environment
- ✓ or concealment of the above.

Case law has shown that the second reason for a qualifying disclosure, a failure to comply with any legal obligation can be interpreted broadly. For example this includes breach of a contract of employment, but for the disclosure to be protected there must be a real legal obligation not just a belief that there is one.

Once a disclosure has been made in good faith to a manager or employer it will be protected under the Act. This should normally be the first route for workers, rather than having to disclose the concern externally. However it does mean that the matter should be dealt with by employers, quickly and thoroughly.

If the matter is not dealt with internally, whistleblowers can disclose to appropriate external bodies. The Act protects disclosures made to prescribed bodies such as the Health and Safety Executive, the Inland Revenue, the Audit Commission, the Charity Commission, the Commission for Social Care Inspection, the Financial Services, General Social Care Council, the Housing Corporation, the Information Commissioner and the National Care Standards Commission (full list can be found at).

The disclosure is also protected if it is made to a legal advisor in order to obtain legal advice.

The Act also helps ensure that organisations respond without trying to cover up, or to victimise or dismiss the whistleblower. If the whistleblower fears they may be victimised, or that a cover-up is likely or there is no appropriate prescribed regulator, or if the matter has already been raised internally or with a prescribed body, wider disclosures can be made and still be protected.

Wider disclosures might be to another professional body, the police, an MP, the media, etc. They should still be reasonable in all circumstances taking into account the seriousness of the matter and likelihood of re-occurrence. Reasonableness would also include consideration of whether the worker first followed any internal whistleblowing procedure the organisation may have.

However if the wrongdoing is of an 'exceptionally serious nature', (such as involving a murder enquiry) the whistleblower need not fear victimisation or cover up to make a protected disclosure to an external body, although it should still be reasonable particularly with regard to whom the disclosure is made.

If the whistleblower is victimised for making the disclosure, they can bring a claim to an employment tribunal for compensation. Dismissals of employees for making a protected disclosure are automatically unfair. Compensation awards will be uncapped and based on the losses suffered.

Any clauses in an agreement between a worker and the employer which prevent the worker from making disclosures protected under the Act will be void.

Further Information

Protect (Whistleblowing Advice) Limited

This charity is an independent authority on public interest and whistleblowing. It promotes compliance with the law and good practice. They also aim to influence public policy and legislation.

ACAS

The Arbitration Conciliation & Advisory Service website provides guidance on whistleblowing for both employers and employees

Direct.Gov

Information on whistleblowing can be accessed through the government websites.

The Chartered Institute of Personnel and Development (CIPD)

CIPD is the professional body for those involved in the management and development of people. They have a factsheet on whistleblowing.

Document 12: Sisters of Support work from home policy .docx

Sisters of Support Work From Home Policy

Purpose

This policy outlines the framework and guidelines for working from home (WFH) to ensure employee and volunteers can work effectively while maintaining productivity, collaboration, and compliance with legal obligations.

1. Scope

This policy applies to all employees, contractors, and volunteers of Sisters of Support who have been authorised to work from home on a regular or ad hoc basis.

2. Eligibility

Working from home arrangements must be agreed upon between the employee and their line manager.

Eligibility will depend on:

The nature of the role.

The employee's/ volunteer's ability to perform tasks effectively from home.

Operational requirements.

3. Work Environment

Employees/ volunteers are responsible for ensuring they have a suitable workspace that is:

Quiet, safe, and free from distractions.

Equipped with reliable internet and necessary tools to perform their duties.

Sisters of Support may provide equipment such as laptops, monitors, or office chairs if required or available.

4. Health and Safety

Employees/volunteers must complete a health and safety self-assessment of their home workspace.

Sisters of Support is committed to ensuring compliance with the Health and Safety at Work Act 1974, even for remote workers.

Any accidents or injuries while working from home must be reported immediately.

5. Working Hours and Availability

Employees/volunteers must adhere to their contracted working hours unless agreed otherwise.

Employees/volunteers are expected to:

Be available for communication during their scheduled hours.

Attend virtual meetings or respond to calls and emails promptly.

6. Data Protection and Security

Employees/volunteers working from home must:

Ensure the confidentiality of all work-related information.

Use organisation-approved devices and software for handling sensitive data.

Adhere to Sisters of Support's Data Protection Policy and IT Security Guidelines.

7. Communication and Collaboration

Regular check-ins with managers or team members will be scheduled to maintain collaboration.

Employees/volunteers should use approved communication tools such as Teams, Email, WhatsApp community.

8. Expenses

Sisters of Support will reimburse if possible reasonable expenses incurred while working from home, such as:

Work-related phone calls.

Additional equipment or supplies, subject to prior approval.

Utility costs (e.g., electricity or internet) will not typically be reimbursed unless explicitly agreed.

9. Termination of WFH Arrangements

Sisters of Support reserves the right to review or terminate work-from-home arrangements based on:

Performance concerns.

Changes in operational needs.

Breach of this policy.

10. Policy Review

This policy will be reviewed annually or as required to ensure compliance with UK employment law and organisational needs.

Approval and Effective Date

Approved by: Amy Turner

Effective Date: 28/01/25

Document 13: SOS safeguarding policy SOS Staff.docx

Sisters Of Support Safeguarding Policy for SOS staff

Purpose

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with Sisters of Support (SOS). This includes harm arising from:

- The conduct of staff or personnel associated with SOS
- The design and implementation of SOS's programmes and activities

The policy lays out the commitments made by SOS and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under SOS's Anti Bullying and Harassment Policy
- Safeguarding concerns in the wider community not perpetrated by SOS or associated personnel

What is safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes.

Further definitions relating to safeguarding are provided in the glossary below.

Scope

- All staff contracted by SOS
- Associated personnel whilst engaged with work or visits related to SOS, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians

Policy Statement

SOS believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of

harm, abuse, neglect and exploitation. SOS will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding [as appropriate]: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them.

SOS commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Prevention

SOS responsibilities

SOS will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy

- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with SOS. This includes the way in which information about individuals in our programmes is gathered and communicated

- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel

- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization

- Follow up on reports of safeguarding concerns promptly and according to due process

Staff responsibilities

Child safeguarding

SOS staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18

- Sexually abuse or exploit children

- Subject a child to physical, emotional or psychological abuse, or neglect

- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

SOS staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

Protection from sexual exploitation and abuse

SOS staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, SOS staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by SOS staff member or associated personnel to the appropriate staff member

Enabling reports

SOS will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

SOS will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their line manager. If the staff member does not feel comfortable reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a Trustee.

Response

SOS will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations.

SOS will apply appropriate disciplinary measures to staff found in breach of policy.

SOS will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Glossary of Terms

Beneficiary of Assistance

Someone who directly receives goods or services from SOS's programme. Note that misuse of power can also apply to the wider community that the SOS serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

In the UK, safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Document 14: Updated_Record_of_Processing_Activities.docx

Record of Processing Activities (ROPA)

Organisation: Sisters of Support CIC

Data Protection Officer (if applicable): Carrie Atkinson

Date Completed: 11/08/25

Review Date: 11/08/26

1. Processing Activity: Website Enquiries & Online Interaction

Description: Collecting contact details and messages from website visitors, plus technical data via cookies.

Categories of Personal Data: Name, email, phone number, enquiry content, IP address, browser data, cookies.

Data Subjects: General public, potential members, potential volunteers.

Purpose of Processing: Respond to enquiries, improve website, provide requested updates.

Lawful Basis: Consent (for updates, cookies); Legitimate interests (responding to enquiries).

Retention: Up to 12 months from last contact, unless longer is needed for legal reasons.

Security Measures: Secure hosting, SSL encryption, password-protected email accounts, limited staff access.

Recipients: Web hosting provider, email service provider.

International Transfers: None.

2. Processing Activity: Membership & Attendance Records

Description: Managing information for members and participants attending activities/events.

Categories of Personal Data: Name, address, contact details, date of birth, emergency contact, special category data (health information, safeguarding concerns – processed with consent or legal obligation), attendance records, feedback, photos/videos (with consent).

Data Subjects: Members, participants, attendees.

Purpose of Processing: Provide support and activities, tailor services, ensure safety, keep attendance data for reporting, promote activities (with consent for images).

Lawful Basis:

Consent (special category data (health information, safeguarding concerns – processed with consent or legal obligation), photos/videos).

Legitimate interests (managing sessions, keeping attendance records).

Legal obligation (safeguarding).

Retention: Attendance records — up to 3 years; health data — only as long as needed for support purposes; photos/videos — until consent withdrawn or 3 years, whichever comes first.

Security Measures: Password-protected storage, restricted access, paper records locked away, anonymisation for reporting.

Recipients: Staff/volunteers, funders (anonymised data only).

International Transfers: None.

3. Processing Activity: Volunteer & Employee Management

Description: Collecting and managing staff/volunteer details for recruitment, role management, and compliance.

Categories of Personal Data: Name, address, contact details, date of birth, NI number, bank details, references, qualifications, training, DBS results, emergency contact, special category data (health information, safeguarding concerns – processed with consent or legal obligation), photos/videos (with consent).

Data Subjects: Volunteers, employees, contractors.

Purpose of Processing: Recruitment, payroll/expenses, training, role management, safeguarding, publicity (with consent for images).

Lawful Basis:

Contract (payroll, role delivery).

Legal obligation (DBS, safeguarding, tax).

Consent (special category data (health information, safeguarding concerns – processed with consent or legal obligation), photos/videos).

Retention: Personnel files — 6 years after role ends; DBS records — as per DBS Code of Practice; payroll/tax — 6 years; photos/videos — until consent withdrawn or 3 years, whichever comes first.

Security Measures: Secure HR files, locked cabinets, encrypted storage, restricted access.

Recipients: Payroll provider, HMRC, DBS service, insurers (where necessary).

International Transfers: None.

4. Processing Activity: Marketing & Communications

Description: Sending newsletters, updates, and event invitations to members and interested individuals.

Categories of Personal Data: Name, email address, phone number (if provided).

Data Subjects: Members, volunteers, general public who opt-in.

Purpose of Processing: Share news, promote activities, encourage engagement.

Lawful Basis: Consent (opt-in communications).

Retention: Until consent withdrawn.

Security Measures: Email platform with secure login, minimal personal data stored.

Recipients: Email marketing provider (if used).

International Transfers: None, unless email provider uses servers outside UK (covered by standard contractual clauses).

5. Processing Activity: Photos & Videos

Description: Taking and using photographs/videos for publicity, reports, and social media.

Categories of Personal Data: Images and/or voice recordings that may identify individuals.

Data Subjects: Members, volunteers, staff, event attendees.

Purpose of Processing: Promote activities, share success stories, report to funders, celebrate achievements.

Lawful Basis: Consent.

Retention: Until consent withdrawn or 3 years, whichever comes first.

Security Measures: Secure storage, access restricted to authorised staff/volunteers, watermarking or anonymisation if appropriate.

Recipients: Website, social media platforms, printed materials, publicity reports, and funders (where appropriate).

International Transfers: Possible if posted online (public access).

Document 15: Updated_ROPA_Sisters_of_Support.docx

Record of Processing Activities (ROPA) – Sisters of Support CIC

Organisation Details

Organisation Name: Sisters of Support CIC

Address:

Contact Email: info@sistersofsupport.co.uk

Telephone: 01325 965378

Data Protection Officer handled by Carrie Atkinson

Processing Activities

Additional Notes

- Data Minimisation: Only essential data is collected for the stated purpose.
- Review Schedule: This ROPA will be reviewed annually or when processing activities change.
- Data Subject Rights: All individuals have the right to request access, rectification, erasure, restriction, objection, and data portability where applicable.