

# **Spiritualists' National Union**

## **Church Policies Document**

**Issued May 2018**

# Contents

|                                                               | Page |
|---------------------------------------------------------------|------|
| Data Protection Policy                                        | 3    |
| Data Protection Guidelines                                    | 8    |
| Data Protection Checklist                                     | 15   |
| Data Protection Traffic Lights                                | 17   |
| Guidelines for Information                                    | 19   |
| Privacy Statement                                             | 20   |
| Church Retention Consent Form                                 | 22   |
| Equality & Diversity Policy                                   | 24   |
| Conflict of Interest Policy                                   | 26   |
| Code of Conduct                                               | 29   |
| Anti-Bribery and Corruption Policy                            | 33   |
| Church Fraud                                                  | 38   |
| Expenses Policy                                               | 40   |
| Internet Use Policy                                           | 42   |
| Environmental Policy                                          | 43   |
| Church Membership Application Form                            | 45   |
| Guidance – Unacceptable Behaviour,<br>Violence and Aggression | 46   |



# Spiritualists' National Union

## Data Protection Policy

The Spiritualists' National Union (SNU) needs to keep certain information on its employees, volunteers, members, service users and trustees to carry out its day-to-day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring that any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

This policy covers employees, volunteers, members, service users and trustees.

In line with the Data Protection Act 1998 principles, the SNU will ensure that personal data will:

- be obtained fairly and lawfully and shall not be processed unless certain conditions are met;
- be obtained for a specific and lawful purpose;
- be adequate, relevant but not excessive;
- be accurate and kept up to date;
- not be held longer than necessary;
- be processed in accordance with the rights of data subjects;
- be subject to appropriate security measures;
- not be transferred outside the European Economic Area (EEA).

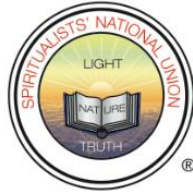
The definition of 'processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper-based personal data as well as that kept on computer.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.</p> <ul style="list-style-type: none"> <li>• <b>Accountability:</b> Those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.</li> <li>• <b>Visibility:</b> Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.</li> <li>• <b>Consent:</b> The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.</li> <li>• <b>Access:</b> Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.</li> <li>• <b>Stewardship:</b> Those collecting personal data have a duty of care to protect this data throughout the data lifespan.</li> </ul> <p>The SNU processes the following personal information: Information will be kept re employee applications and references, including contact details, payroll and bank details and supervision and appraisal notes. Membership applications (Church and Individual), including contact details, applications for SNU educational services and events, bank account details as appropriate. Non-member applications for services and events, including contact and bank account details as appropriate.</p> <p>Personal information is kept in the following forms: paper and computer-based systems.</p> <p>Groups of people within the organisation who will process personal information are: SNU paid staff, volunteer elected members of District Councils and Churches, volunteer members of the various SNU Committees, Trustees.</p> <p>The needs we have for processing personal data are recorded on the public register maintained by the Information Commissioner. We notify and renew our notification on an annual basis as the law requires.</p> <p>If there are any interim changes, these will be notified to the Information Commissioner within 28 days.<br/>The name of the Data Controller within our organisation as specified in our notification to the Information Commissioner is Jane Barton, Chief Administrative Officer, Redwoods, Stansted Hall, Stansted Mountfitchet, Essex CM24 8UD.</p> <p>Under the Data Protection Guardianship Code, overall responsibility for personal data in a not-for-profit organisation rests with the governing body. In the case of the SNU this is the National Executive Committee (NEC).</p> <p>The governing body delegates tasks to the Data Controller. The Data Controller is responsible for:</p> <ul style="list-style-type: none"> <li>• understanding and communicating obligations under the Act;</li> </ul> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• identifying potential problem areas or risks;</li><li>• producing clear and effective procedures;</li><li>• notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes.</li></ul> <p>All SNU paid staff, volunteer elected members of District Councils and Churches, appointed volunteer members of the various SNU Committees, and Trustees who process personal information must ensure that they not only understand but also act in line with this policy and the data protection principles.</p> <p>Breach of this policy will result in disciplinary proceedings for paid staff and removal from office of volunteers elected to Church or District Councils and SNU-appointed Committee members and Trustees.</p> | <p>To meet our SNU data protection policy, paid staff, volunteer elected members of District Councils and Churches, and appointed volunteer members of the various SNU Committees will:</p> <ul style="list-style-type: none"><li>• ensure that any personal data is collected in a fair and lawful way;</li><li>• explain why it is needed at the start;</li><li>• ensure that only the minimum amount of information needed is collected and used;</li><li>• ensure that the information used is up to date and accurate;</li><li>• review the length of time information is held;</li><li>• ensure that it is kept safely;</li><li>• ensure that the rights people have in relation to their personal data can be exercised.</li></ul> <p>We will ensure that:</p> <ul style="list-style-type: none"><li>• everyone managing and handling personal information is trained to do so;</li><li>• anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer, service user or Trustee, knows what to do;</li><li>• any disclosure of personal data will be in line with our procedures;</li><li>• queries about handling personal information will be dealt with swiftly and politely.</li></ul> |
| <p>Training and awareness-raising about the Data Protection Act and how it is followed in this organisation will take the following forms:</p> <p>On induction: PowerPoint Presentation – Responsible for Information.<br/>ICO posters will also be used throughout the organisation.</p> <p>General training/awareness-raising: <b>Guidelines are provided to everyone dealing with, or with responsibility for, SNU data. The Government Training Aid, 'Responsible for Information', is an appendix to the guidelines and is available as a PDF document or a PowerPoint presentation. There is a mandatory requirement that this document is read by all personnel dealing with data.</b></p>                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Before personal information is collected, we will consider what is the minimum information we should request and specify the length of time this information will be held by the SNU.</p> <p>We will inform people whose information is gathered why the information is needed, the use of the information and who will have access to the information.</p> <p>We will take the following measures to ensure that personal information kept is accurate: make an annual request to everyone for whom we hold data for confirmation of the correctness of the information and its current appropriateness. Non-response to this request will mean that a decision will be taken to remove the information from our paper and/or computer-based records.</p> <p>Our churches and District Councils will be asked to ensure that data they hold is removed immediately on personal request or twelve months after lapse of membership. (This is in line with the twelve months' period of grace allowed for membership fees to be paid.)</p> <p>Personal sensitive information will not be used apart from the exact purpose for which permission was given.</p> | <p>The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken: lockable filing systems for paper records, password protection for computer-based records. Passwords will be changed at least annually. Removal of information 'off site' will only be with the authority of two of the four Officers of the SNU.</p> <p>Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary action or, in the case of elected volunteers or appointed Committee members or Trustees, removal from office.</p> <p>All unauthorised disclosures will be recorded in the ledger for this purpose held at Head Office and supervised by the General Manager.</p> |
| <p>Anyone whose personal information we process has the right to know</p> <ul style="list-style-type: none"> <li>• what information we hold and process on them;</li> <li>• how to gain access to this information;</li> <li>• how to keep it up to date;</li> <li>• what we are doing to comply with the Act.</li> </ul> <p>They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.</p> <p>Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Chief Administrative Officer, Redwoods.</p>                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The following information will be required before access is granted: a written signed application giving full details of SNU association, e.g. member number.</p> <p>We may also require proof of identity before access is granted. The following forms of ID will be required: signed confirmation by church or District Council President, photocopy of utilities bill, photocopy of driving licence or passport.</p> <p>Queries about handling personal information will be dealt with swiftly and politely.</p> <p>We will aim to comply with requests for access to personal information as soon as possible but will ensure that it is provided within the 40 days required by the Act from receiving the written request and relevant fee. All such queries should be directed to Jane Barton, Chief Administrative Officer, Redwoods, Stansted Hall, Stansted Mountfitchet, Essex CM24 8UD.</p> |
| <p>This policy will be reviewed annually in June to ensure that it remains up to date and compliant with the law. N.B. June has been chosen as the date because full Church Returns will have been received and processed by then.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>I confirm that I have read and understood SNU's Data Protection Policy and will act in accordance with it.</p> <p>I am connected with this organisation in my capacity as a</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> member of staff</li> <li><input type="checkbox"/> volunteer</li> <li><input type="checkbox"/> Trustee/management committee member</li> </ul> <p>Signature: .....</p> <p>Print name: .....</p> <p>Date: .....</p> <p>Please return this form to the General Manager, Redwoods, Stansted Hall, Stansted Mountfitchet, Essex CM24 8DU.</p>                                                                                                                                                                                                                                                                                                                  |



## Spiritualists' National Union

### Guidelines for Data Protection

#### PREAMBLE

25th May 2018 will see the introduction of the new General Data Protection Regulation (GDPR) of the European Union, which will replace the current British Data Protection Act 1998, and the government has confirmed that the UK's decision to leave the EU will not affect the commencement of GDPR in the UK. These regulations are more stringent than current legislation and will be more strenuously policed. These changes will have serious impacts on all organisations, including the SNU. The SNU is therefore, in line with other UK charities, reviewing and implementing more stringent data controls than previously in order to be ready for the new requirements. **(PLEASE NOTE THAT THESE GUIDELINES TAKE IMMEDIATE EFFECT AND ARE NOT INTENDED TO COMMENCE IN MAY 2018.)**

These guidelines are intended to support and help anyone and everyone involved with personal data within the SNU. This includes SNU paid staff, elected church committees and District Councils, appointed SNU Committees, volunteers and Trustees.

#### What is Personal Data?

Any information 'about' a person, from which a person may be identified, even indirectly (i.e. where there is anonymous data but the data group is so small and/or specific that an individual could be identified, even if the data is anonymous). If you hold information about individuals, either on computer or in paper records, you may be holding 'personal data'. Personal data is data that:

- identifies an individual, either on its own or combined with other information within any organisation;
- includes opinions in regard to that individual;
- includes information which informs or influences decisions affecting an individual;
- conveys biographical information about the person – the fact that an individual attended a meeting will be personal data about that person;
- also includes any images or photographs where an individual can be easily identified.

This can include comments about an individual in an email, a paper file that contains the name of an individual, or even the contact details of someone on a post-it note.

As a membership organisation the SNU holds large amounts of personal data relevant to its members. That's not just Individual Members at Head Office but also every member of every Church and Pioneer Centre, both associate and full.

In addition, we hold data about everyone who registers for SNU Education Courses, attends local and national training events, plus our register of trainee and approved healers.

#### What is Sensitive Personal Data?

Personal sensitive data attracts higher privacy requirements for certain categories of information that have been defined in the Act as sensitive:

- racial or ethnic origin;
- political beliefs;

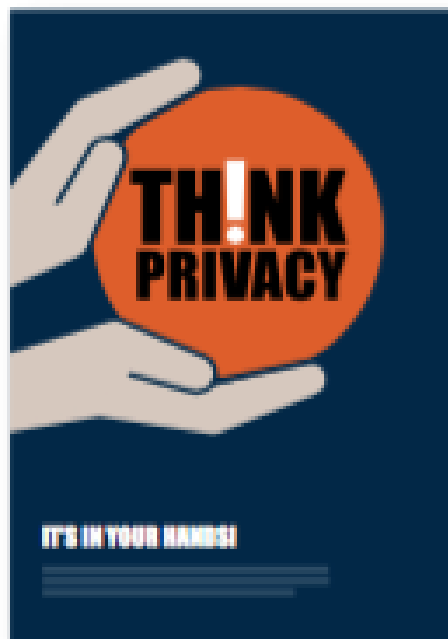
- religious beliefs or other beliefs of a similar nature;
- physical or mental health;
- sexual life;
- the commission or alleged commission by him/her of any criminal offence; or
- any criminal proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

You are obliged to treat sensitive personal data with the utmost of care, respect and confidentiality and must obtain consent from the individual before processing. There are other conditions, which are strictly controlled, and explicit consent should be the first consideration in your mind.

### What is Data Protection?

The Data Protection Act 1998 and GDPR require that information about PEOPLE is collected and used fairly, stored safely and not processed unlawfully.

**IT IS INCUMBENT ON THE SNU TO ENSURE THE SAFETY  
AND PROTECTION OF THE PERSONAL DATA IT HOLDS FOR  
EVERY INDIVIDUAL**



### Glossary of Terms

**ICO** – ‘Information Commissioner’s Office’ - the UK agency responsible for Data Protection.

**Subject** – any person and their data.

**Controller** – the organisation that defines the requirements of, and the processing of, your personal data. They have responsibility to ensure that processors abide to the GDPR rules. Within the SNU this is the Officers and members of the National Executive Committee.

**Processor** – any person or organisation that processes information on behalf of an organisation in accordance with the Data Controller's directions. They too must abide by the rules and maintain records of the processing activities. They have a responsibility to ensure that, once the purpose for data processing is fulfilled, the data should be deleted.

**Data Protection Officer** – the person with overall responsibility for data control within an organisation. For the SNU this is Jane Barton, Chief Administrative Officer.

**Consent** – under the new legislation it is not sufficient for a ‘subject’ to tick a box. There has to be a clear description of why the information is required, how it will be used and space for a signed authority to retain their personal data.

**Right to be Forgotten** – Subjects now have the right to request that their data you hold on them is deleted. This may be because the purpose for its collection is no longer valid or because they are withdrawing their consent for the data to be retained.

#### **Data Breach**

If in error you breach the confidentiality surrounding a person’s personal data, this is a Data Breach. Currently the SNU has a Register for such breaches and if you believe you may have breached Data Protection you should contact Jane Barton with immediate effect. A breach could be as simple as sending information about an individual to the wrong person by email.

Within GDPR there is a requirement that Head Office notifies the ICO within 72 hours of any Data Breaches and the steps put in place to rectify any problems.

#### **Data Subject Access Request**

Any person (subject) for whom the SNU holds data has the right to request the details of the information we hold about them. The law requires that we respond in a timely fashion once we have confirmed the identity of the person making the request.



#### **Important requirement 1**

All documents, membership application forms and applications for educational courses and events will need to have a description of the applicable data processing criteria and consent details included. This advises the individual how their information will be processed, stored and shared with other parts of the organisation.

#### **Important requirement 2**

If a Church or Pioneer Centre member’s membership ceases for whatever reason, then their details **MUST** be deleted from the Church/ Pioneer Centre records. Where hard copies of information have been provided, these should be securely disposed of, i.e. shredding.

#### **Principles**

GDPR does not have principles in the same way as the UK Data Protection Act 1998; however, Article 5 specifies the following: -

Personal data shall be:

- (a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to

- ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
  - (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.



### Data Subject Access Request

Anyone we hold data for can request that we provide the full details of this information. The law requires that we respond in a timely way.

All requests received should be directed to Rachael Loukes, General Manager, Redwoods, Stansted Hall, Stansted Mountfitchet, Essex CM24 8UD.

The necessary information will be provided once we have confirmed the identity of the person making the request.

Please note that everyone dealing with data should be vigilant in trying to recognise a request for information; it may come in many formats. If you have any doubts, please refer the matter to Chief Administrative Officer: Jane Barton.



## Social Networking

Social media posts are subject to Data Protection and you should exercise caution when making any comments or updating your social media accounts. Avoid making opinions about individuals in any form.

You should never disclose any knowledge and official information, make commitments or engage in activities on behalf of the SNU.

You must not represent the organisation when expressing personal opinions.

You should ensure that no disparaging comments are made about any living individual.

## Building Security

If your church or centre has CCTV surveillance, then you **MUST** register with ICO.



If your office, church or centre is accessible to members of the public, then you should make sure that personal data is not left visible on desks or computers, left on printers or in unlocked filing cabinets, or visible in church/centre offices or public areas.

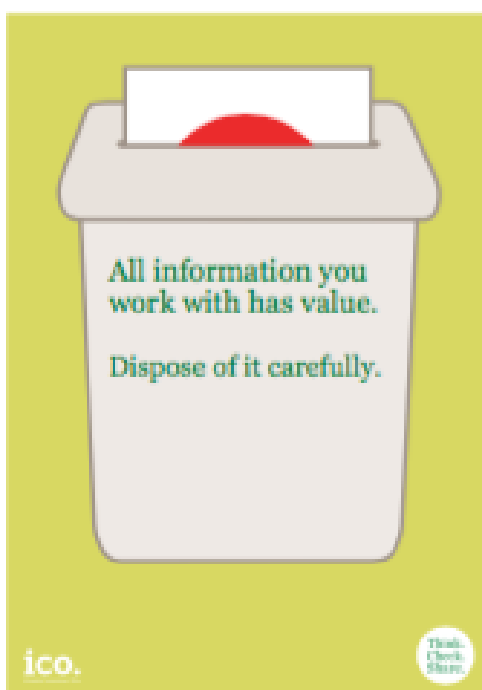
- You should ensure that personal data is not visible to third parties by ensuring that no personal or confidential information is left on your desk, uncollected from printers or visible on your computer screen, or unintentionally displayed in any area of your church or centre.
- If using wireless you should not view sensitive personal data, as wireless is a shared medium, which may be intercepted.
- Offices or church storerooms which contain personal data should be locked when not in use and PCs or laptops should be locked (using CTRL-ALT-DELETE) when they are not being used.
- Hard-copy personal data should be shredded when it is no longer required.
- If personal data has been copied for a 'one-off' purpose such as a meeting, it is good practice for one individual to collect the papers at the end of the meeting and shred them.
- If several people have access to personal files, then set up a 'tracking system' to ensure that you always know who is responsible for a file. An example is to have tracker cards, which enable staff to 'sign out' a file.
- Never give out passwords to anyone. Your password must be known only to you and should be in a format that is not easily guessable. Avoid using a password that is obvious, such as "password" or "welcome".
- Ensure that access to personal data is restricted to only those who need to access it to fulfil the requirements of their role and responsibility.

The golden rule is to respect the privacy of the individuals to whom the data relates and treat their data as highly confidential.

Therefore:

- Think of personal data held about individuals as though it were held about you.
- Comply with the Data Protection Policy and refer to this guidance as a tool of support.
- Only record information which is necessary, and use it only as permitted in accordance with our policies.

- Do not use personal data for purposes of which the individual is unaware.
- Don't provide information, whether to other employees, contractors, data processors or anyone else, without first checking that the recipient is who they say they are and that they have a valid justification for receiving the data. Provide only the data necessary for that purpose.
- Don't provide information over the telephone, fax, by email or in any other way if you are not certain who will receive it. If in doubt, contact the Data Protection Officer for guidance.
- Ensure that you have explicit consent to process sensitive data or that you have another lawful basis for processing such data.
- Ensure that sensitive personal data is kept even more securely, with access strictly limited, and use it only for the approved purpose. Don't collect it unless it is essential to do so.
- Ensure that where sensitive personal data is to be transferred to or from the UK or outside the UK, you have authority to do so and you have consulted with the Data Protection Officer or your line manager.
- Remember that records may be disclosed, so they must not contain inappropriate comments.
- Remember that wilful or negligent non-compliance with this policy is a serious disciplinary matter that could result in dismissal and/or legal action by Data Protection authorities or the individuals to whom the personal data relates.



#### **Elementary housekeeping is vital:**

- Keep passwords confidential.
- Keep manual data and files locked and secure at all times.
- Don't leave information unattended, whether paper records or unattended computer screens.
- Don't take personal data outside the organisation unless it is essential to do so, in which case take only what is necessary and ensure that you keep it strictly confidential.
- Ensure that personal data records are accurate and up-to-date and that unnecessary and outdated records are deleted/shredded or deleted from computers.
- Don't print personal data if it is not essential to do so, and ensure that printouts are shredded and disposed of properly when no longer needed.
- Ensure that you maintain strict control of personal data in all forms, whether held manually or on desktop or laptop computers, handheld devices or PDAs, mobile telephones, organisers or any other manual or electronic device that holds or stores personal data.
- Adopt a clear-desk policy.
- Take care when sending group emails and sharing personal email addresses where the individual has not consented.

- Double-check that the email address is the correct recipient before sending, and avoid sending to the incorrect recipient.





## Spiritualists' National Union

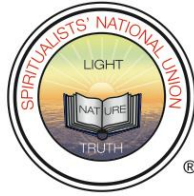
### Data Protection Checklist for Churches and Centres:

We have established a check list to support churches to ensure they comply with the principles of the Data Protection Act.

- ☐ Do I only gather the information about an individual I need and do I know what I am going to use it for? Think about what information is necessary when you are collating information - i.e. church membership, committee members, attendance at events etc.
- ☐ Do the people whom I hold information on know I have it and understand what it will be used for? Explain why the information is required, how you will use and share their data. Ensure you draw their attention to the SNU Privacy Statement
- ☐ Do we display the Privacy Statement on our notice board? Ensure this is displayed in a prominent place in your church
- ☐ Have all members' attention been drawn to the Privacy Statement when joining/re-joining the church? Ensure all members tick to confirm they have seen the privacy statement and consented to how you will use their data
- ☐ Am I sure the personal information is accurate and up to date? Implement a system/process to ensure you do an annual check for personal details and amend any personal information upon notification by the individual
- ☐ Do I delete/destroy personal information as soon as I have no more need for it? Where a member does not renew their membership (after the 12-month waiting period) ask them to complete the consent form (attached) to hold their details for historical purposes relating to applications for accreditations and awards. If the member refuses then you must remove their name from the membership list and redact their personal details in the roll book (either by blacking out or sticking a white label over them). Shred any personal data that is no longer needed
- ☐ Is there any personal information on public display in the church? What about names and contact details of people on a list for events/workshops? Undertake a regular audit to ensure there is no personal data lying around. Store all personal data in a lockable file
- ☐ Is access to personal information limited only to those who have a need to process personal data within their designated role? Ensure access is restricted and stored securely to avoid personal data getting into the wrong hands
- ☐ If I want to publicise some of our committee/member details on our website have I consulted with them about this and obtained their consent? It is best to obtain written consent
- ☐ Do I ask permission from our congregation if I wish to take their photograph to publicise events or promote our church? Yes, permission must be sought; this can be done by making an announcement and giving people the opportunity to withdrawn from group photographs
- ☐ If I use CCTV, is it covered by the Act? Am I displaying notices telling people why I have CCTV? Are the cameras in the right place or do they intrude on anyone's privacy? You must register with the ICO if you have CCTV and ensure visitors are aware
- ☐ Do my committee members understand their responsibilities under the Act? Ensure all committee members understand their responsibility by making it an agenda item at committee meetings

- ☐ What would I do if someone asked me for all of the information that the church and SNU holds on them (this may be different depending on whether it is a church or committee member). Contact the SNU Data Protection Officer for advice

If you need any support with any issues relating to the Data Protection Act or require further guidance on a specific matter please contact: [jane.barton@snu.org.uk](mailto:jane.barton@snu.org.uk)



## Spiritualists' National Union

### Guidelines for Data Protection

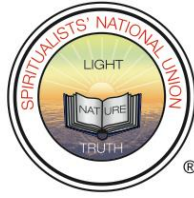
### **TRAFFIC LIGHT DO'S AND DON'TS**

The SNU recognises the complex and serious nature of GDPR (General Data Protection Regulations), but it is a legal requirement for churches and centres to comply (along with all other organisations across Europe.) The SNU is here to support you when you need it. Contact us if you have any questions or concerns *as soon as they arise*. We'll help you take the best action, which will help you to comply with the law and avoid the very large fines that can be imposed for mishandling of personal data. We're here to help, and hope this will prevent any issues from taking your time away from the important work of running your church or centre.

For the purposes of Date Protection requirements, the following table uses Traffic Light Red and Green to signify **Do's and Don'ts**.

| DO'S                                                                                                                                                                                                                                                                                                  | DON'TS                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>DOCUMENT CONTROL</b><br>Ensure that all documents with personal data are kept under lock and key with only specified people having access to them.                                                                                                                                                 | Never leave documents that contain personal data lying around where other people can see them.                                                                                                                                   |
| <b>DATA HELD ON COMPUTERS</b><br>If you keep personal data on a computer or USB memory stick you must ensure that it is password protected.                                                                                                                                                           | Never take records that contain personal data away from the church premises. This includes information held on a computer or USB memory stick.                                                                                   |
| <b>SNU PRIVACY STATEMENT</b><br>The SNU Privacy statement must be posted in a prominent position on your church Notice Board.<br>Anyone providing personal data for any reason must sign to say they have read and accept this statement. <b><u>THIS INCLUDES PATIENTS WHO ATTEND FOR HEALING</u></b> | Failure to request that people sign to acknowledge acceptance of the Privacy statement is a major breach of the new Data Protection laws, and could result in you being prosecuted and fined.                                    |
| <b>ADVERTISING</b><br>Before you include the name of the person or persons engaged to take any service or event in advertising on social media or on a poster, you must gain their permission to do so.                                                                                               | Never post information about anyone on social media or advertising posters without first gaining their agreement that you can do this. Failure to do this is breaking the law and could lead to a censure notice or prosecution. |

|                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>DATA BREACHES</b><br/>         If you have a data breach – in other words personal data is either released by mistake or records are lost or stolen. <b>YOU MUST INFORM HEAD OFFICE AND SUBMIT A DATA BREACH RECORD FORM.</b></p>                                                                              | <p>If you have a data breach don't try to conceal it or sort the matter yourselves. New data protection laws require that a data breach notification be given within 48 hours of the breach.</p> |
| <p><b>DATA REMOVAL</b><br/>         People have the right to ask that you remove and destroy any of their personal data that you hold. <b>YOU MUST DO AS THEY ASK.</b></p>                                                                                                                                           | <p>Failure to remove personal data when asked to do so is a major breach, and could result in you being prosecuted and fined.</p>                                                                |
| <p><b>SUBJECT ACCESS REQUEST</b><br/>         People can ask at any time for you to supply full details of their personal data that you hold on record.</p> <p>You must provide the information for such a request within 1 month of the request. The information must be provided <b>FREE OF CHARGE.</b></p>        | <p>Failure to provide information to a Subject Access Request is considered a major breach and could result in you being prosecuted and fined.</p>                                               |
| <p><b>SHARING DATA</b><br/>         Before you share a persons' personal data with someone else <b>YOU MUST</b> obtain their permission to share it.</p>                                                                                                                                                             | <p>Failure to obtain permission to share personal information is breaking the law and could lead to a censure notice or prosecution.</p>                                                         |
| <p><b>DATA RETENTION</b><br/>         If for whatever reason someone's church membership becomes lapsed you must ask them to sign the consent form to give permission for retention of information. If the person refuses to give their permission you must remove their personal data – see Data Removal above.</p> | <p>Failure to do this is breaking the law and could lead to a censure notice or prosecution.</p>                                                                                                 |



## Spiritualists' National Union

### Guidelines – Responsibility for Information

#### Definition of Information and Information Security

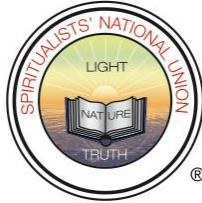
- Information is something that has meaning – facts provided or learned about something or someone. The practice of protecting information is information security.
- Customer information (all of our Church and Individual Members as well as those who purchase SNU Products and training are our customers).
- Information can come in many types and formats. It can be stored in various ways – Paper documents, Computers, Smartphones, USB memory sticks, Networks, Tablets and PDAs the Cloud.
- Intellectual Property – includes all of the Bye Laws, Rules and Procedures necessary for the SNU to function and ALL the personal data we hold on individuals. It includes any and all information held by anyone acting as a volunteer for the union.
- **This information belongs to the Church/Centre and/or the SNU. When an individual no longer holds a church or SNU committee position, it is a legal requirement that THEY MUST RETURN all information they hold to the church or the union. Anything they hold on an IT system MUST be deleted and written confirmation of this provided.**

#### Protecting and sharing information

- You need to protect information – never leave information lying about, lock documents in a safe or a filing cabinet.
- Don't put sensitive information onto a USB memory stick to use at home or at another location.
- Ensure that access to computer held information is password protected. Limit the issue of the password to as few a people as possible. Keep the password in a sealed envelope locked in a safe or filing cabinet.
- Don't dispose of documents by simply by putting them in the bin. **Consider purchasing a document shredder, these are available for a few pounds.**
- Where possible avoid using personal email addresses. There are numerous websites where you can set a church/centre email address free of charge.
- Never discuss sensitive information in 'ear-shot' of other people. Hold your discussions behind closed doors with only those who have a right or need to hear the discussion present.
- Mishandling information can cause harm and distress and could result in legal action.
- **Before you share someone's personal information with anyone else YOU MUST obtain his or her permission to do this.**

#### Staying safe online

- The Internet has a lot to offer but so does Internet crime! Any and all the information your church/centre holds could have potential value to someone.
- If you don't recognise a company or name on an email delete it. If it's that important they will contact you again in another way.
- Social Networks offer enormous benefits. **Remember they also have many negative uses. Limit the amount of sensitive information you upload on them. You wouldn't walk around with a notice on your back with all your personal details for the world to see. The same applies on social networking sites.**



# **Spiritualists' National Union**

## **Privacy Statement**

Preservation of your privacy is important to the Spiritualists' National Union and we are committed to letting you know how we use your personal information and to making only responsible use of your data.

References to "we", "us", "you" or "our" in this Privacy Policy are references to the Spiritualists' National Union, a company limited by guarantee registered in England and Wales, registered company number 71661, and a charity registered in England and Wales, registered charity number 261898, and in Scotland, registered charity number SC041714.

### **1. Information about you**

- 1.1 We will collect personal information from you when you enquire about our activities, register as a member with us or subscribe to one of our services. This may include your name, title, email address, physical address, telephone numbers and job title. We may also ask for some additional, non-personal information.

### **2. Our use of this information**

- 2.1 Your personal information will be used only to process your requests, to provide you with our services and to provide you with information relating to our services and all other services which we think you may be interested in. We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date and that we only keep it as long as is reasonable and necessary.
- 2.2 We will share your information with third parties only relating to administrative purposes and/or membership registration and renewal and purchase of education services. This may include, for example, processing payments for services provided, membership and accreditation for awards.

### **3. Disclosure of your information**

- 3.1 We may disclose your personal information:
  - if we are under a duty to disclose or share visitors' personal data to comply with a legal obligation
  - for law enforcement purposes
  - to apply our terms of use and other agreements

### **4. Security**

- 4.1 We will take reasonable precautions to prevent the loss, misuse or alteration of information you give us.
- 4.2 Communications in connection with this service may be sent by e-mail. For ease of use and compatibility, communications (other than payments where applicable) will not be sent in an encrypted form unless you require it and provide the certification to enable us to communicate with you in that way. E-mail, unless encrypted, is not a fully secure means of communication. Whilst we endeavour to keep our systems and

communications protected against viruses and other harmful effects we cannot bear responsibility for all communications being virus-free.

## 5. Cookies

- 5.1 If cookies are used they will be used only to assist the purposes set out in this privacy policy, but cookies will not be used if we do not consider them to be necessary. Please read our Cookie Use Policy for more information.

## 6. Other information

- 6.1 If you would like us to correct or update any information, or if you would like information deleted from our records, then please email us at – [patocao@snu.org.uk](mailto:patocao@snu.org.uk)

- 6.2 Retention Policy

**Individual Members**, please be aware that we will retain information of Individual Membership numbers, the dates this was in place, the District Council allocated and the details of any SNU awards gained.

This retention policy is to enable the SNU to produce historical statistical information from time to time. Also, should you ever wish to re-join the SNU and are able to provide your previous IM number we can trace information.

**None of this retained information will be traceable back to a named individual without provision of the previous Individual Member number by the individual member. Confirmation of identity will be required before any retained information is divulged.**

**The Individual Members retention policy does not apply to Church Membership.**

### CHURCH MEMBERS

You will be asked to sign to confirm your acceptance of this Privacy Statement when you apply for church membership.

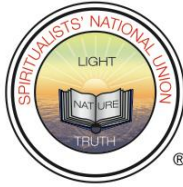
**If, for whatever reason, your church membership becomes lapsed, you will be invited to sign a consent form regarding retention of your information. This form is contained in the Data Protection Checklist for Churches and Centres. It is also issued as a separate document for churches to use**

- 6.3 This privacy policy may be updated from time to time, so please check it periodically.

- 6.4 Links within our sites to other websites are not covered by this privacy policy.

By submitting your personal data, you:

- (1) declare that you have read, understood and accepted the statements set out in this data protection clause;
- (2) are declaring that the information given in the application is complete and true to the best of your knowledge, and understand that deliberate omissions and incorrect statements could lead to your application being rejected; and
- (3) are giving your consent to the processing of the information submitted in relation to membership or services.



## Spiritualists' National Union

### CONSENT FORM FOR CHURCH/CENTRE TO RETAIN MEMBERSHIP DETAILS WHEN AN INDIVIDUAL RESIGNS FROM THE CHURCH (OR DOES NOT RENEW THEIR MEMBERSHIP)

**Name of Church:** \_\_\_\_\_

The Data Controller for churches is the Spiritualist National Union (SNU)

The Data Protection Officer for the SNU is Rachael Loukes and can be contacted at: -

Spiritualists' National Union  
Redwoods  
Stansted Hall  
Stansted, Essex CM24 8UD  
Telephone: 01279816363  
Email: rachael.loukes@snu.org.uk

Name of church is the representative

The legitimate aim of the church is to ensure they hold accurate and up to date details of members and facilitate administrative processes in accordance with church rules and SNU processes.

Recipients of the data include the church secretary and the SNU

The retention period of your data is for as long as you remain a member of the church.

#### **Your rights are as follows:**

1. The right to be informed of what data is held on you and how it will be used
2. The right of access to the information held by the church
3. The right to have your information corrected
4. The right to have your data erased
5. The right to restrict processing of your data
6. The right to data portability where practical and feasible – this may include transferring your data to another church/centre/SNU
7. The right to object to your data being held and processed
8. The right not to be subjected to an automated decision which produces a legal effect or a significant effect on you. In these circumstances, you can request human intervention; express your point of view; and obtain an explanation of the decision and challenge it.

The church would like to retain the details of your membership for a period of 2 years. The reason for storing your data is to provide a record of church membership required for members wishing to undertake awards and accreditations with the Spiritualist National Union.

Under Data Protection Principle 5 and to comply with the General Data Protection Regulations Article 5(1)(e) there is a requirement to ensure personal data is not retained for longer than necessary.

In order to comply with the above we must obtain your consent to hold your data for the purpose explained above. Any data stored beyond the end of your membership will be held securely. Please complete the form on the next page to indicate your preference.

## Name of Church

Please indicate your consent for us to hold your data for a period of 2 years following the end of your church membership below. Should you agree to us retaining your data we may share your details with the Spiritualist National Union for administrative purposes.

- ☐ Yes, I agree to you holding my personal details for a period of 2 years
- ☐ No, I do not agree with you holding my personal details and request you delete them securely

**Name (Print):** \_\_\_\_\_ **Signature:** \_\_\_\_\_

**Secretary (Print):** \_\_\_\_\_ **Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## CHURCH ROLL BOOK

The Church Roll Book, which you will have signed to signify your acceptance of Spiritualism as your chosen religion based on the Seven Principals, when you were invited into full church membership, is the churches archive and an important historical document.

Should you decide to terminate your church membership, it would be helpful if you would consent to your personal details being kept on the Roll Book, as to remove them would deface and spoil this important document.

## Name of Church

Please indicate your consent for us retain your personal details in the Church Roll Book, in perpetuity, following the end of your church membership below. Should you agree to us retaining your data we may share your details with the Spiritualist National Union for historical research and administrative purposes.

- ☐ Yes, I agree to you holding my personal details in perpetuity
- ☐ No, I do not agree with you holding my personal details and request you delete them securely

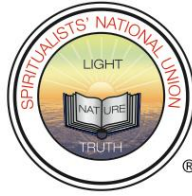
**Name (Print):** \_\_\_\_\_ **Signature:** \_\_\_\_\_

**Secretary (Print):** \_\_\_\_\_ **Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Having given consent and where you change your mind in the future, you have the right, in accordance with the General Data Protection Regulations, to request your personal data to be deleted by writing to the Church Secretary or the Data Protection Officer.

**This form will be stored securely and confidentially until the expiry of the two-year period. If you wish your details to be deleted prior to the expiry of the two-year period please contact the Secretary.**



# Spiritualists' National Union

## Equality Policy

The Spiritualists' National Union (SNU) is committed to eliminating discrimination and encouraging diversity throughout our organisation. Our aim is that our organisation will be truly representative of all sections of society and each employee, volunteer, member and associate feels respected and able to give of their best.

To that end the purpose of this policy is to provide equality and fairness for all in our employment, our volunteers, members and associates and not to discriminate on grounds of gender, gender reassignment, marital status (including civil partnership), race, ethnic origin, nationality, national origin, disability, sexual orientation, religion or age. We oppose all forms of unlawful and unfair discrimination.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

### Our Commitment:

- To create an environment in which individual differences and the contributions of all our staff, volunteers, members and associates are recognised and valued
- Everyone involved with the SNU is entitled to an environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- Training, development and progression opportunities are available to all staff
- Equality in the workplace is good management practice and makes sound business sense
- We will review all our policies, practices and procedures to ensure fairness
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings
- This policy is fully supported by senior management
- The policy will be monitored and reviewed annually

This commitment includes providing training opportunity for everyone involved with the SNU about their rights and responsibilities under the equality policy. Responsibilities include everyone conducting themselves to help the organisation provide equal opportunities for everyone and preventing bullying, harassment, victimisation and unlawful discrimination.

Everyone involved with the SNU should understand that they, as well as the SNU, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their work, against fellow employees, customers, members, associates and the general public.

We take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal or removal from membership and appointed office without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

In order to adhere to our commitments, we will ensure we:

- make opportunities for training, development and progress available to all staff and associates, who will be helped and encouraged to develop their full potential, so that their talents and resources can be fully utilised to maximise the efficiency of the organisation
- make decisions based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act)
- review employment practices and procedures and the requirements appertaining to volunteers, members and associates when necessary to ensure fairness, and also update them and the policy to take account of changes in the law
- monitor the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity and in meeting the aims and commitments set out in the equality policy
- Monitoring will also include assessing how the equality policy and any supporting action plan are working in practice across the whole organisation, reviewing them annually and considering and taking action to address any issues

The equality policy is fully supported by senior management.

Details of the organisation's grievance and disciplinary policies and procedures can be found in the Employee Handbook. This includes with whom an employee should raise a grievance – usually their line manager.

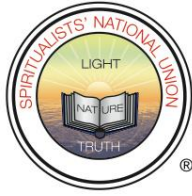
Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

Volunteers, members and associates should follow the SNU Complaints Procedure.

***Appendix A to this Policy provides Guidelines about Equality and Diversity and is provided as a separate document.***

***It is also available as a printable PDF or a downloadable PowerPoint presentation from the SNU Website.***

***You are advised to read this so that you have an understanding of this subject.***



# **Spiritualists' National Union**

## **Conflict of Interest Policy**

### **Purpose of the Policy**

This policy applies to all Trustees of the Spiritualists' National Union. Its purpose is to protect both the Trustees and the charity from possible accusations of impropriety.

Trustees have a legal obligation to act in the best interests of the charity and, under the Companies Act 2006, a statutory duty to act in the way which he/she considers in good faith would be most likely to achieve the charity's purposes. Conflicts of interest may arise where an individual's personal interests or loyalties to third parties conflict with the interests of the charity. Such conflicts can inhibit free and impartial discussion, result in decisions that are not in the best interests of the charity and risk the impression that the charity has not acted properly.

### **What is a conflict of interest?**

A conflict of interest is any situation in which a trustee's personal interests, or interests that they owe to another body, may (or may appear to) influence or affect the trustee's decision-making.

It is inevitable that conflicts of interest occur. The issue is not the integrity of the trustee concerned but the management of any potential to profit from a person's position as trustee, or for a trustee to be influenced by conflicting loyalties. Even the appearance of a conflict of interest can damage the charity's reputation, so conflicts need to be managed carefully.

Conflicts of interest may come in a number of different forms:

- direct financial gain or benefit to the trustee, such as:
  - payment to a trustee for services provided to the charity;
  - the award of a contract to another organisation in which a trustee has an interest and from which a trustee will receive a financial benefit;
  - the employment of a trustee in a separate post within the charity, even when the trustee has resigned in order to take up the employment;
- indirect financial gain, such as employment by the charity of a spouse or partner of a trustee, where their finances are interdependent;
- non-financial gain, such as when a user of the charity's services is also a trustee.
- conflict of loyalties, such as where a trustee is appointed by the local authority or by one of the charity's funders, or where a friend of a trustee is employed by the charity

### **Declarations of interests**

Potential conflicts of interest should be declared upon:

- Invitation to join the National Executive Committee as a Trustee;
- The conflict of interest first arising (e.g. on appointment to the Board of a company with which the charity has a relationship);

- The Trustee becoming aware that a potential conflict of interest exists (e.g. when the Trustee first becomes aware that a company of which he is director has a contractual relationship with the charity).

A Declaration of Pecuniary Interests form is available from the Head Office. All new Trustees are asked to complete a declaration on appointment and all existing Trustees will be asked to complete a form on adoption of this policy and to review their declared interests at each meeting. A register of declared interests is maintained by Head Office.

### **Management of conflicts of interest**

The extent of a Trustee's involvement in the discussions and decisions of the National Executive Committee will depend upon the nature of their conflict of interest.

**In the first instance, it is the Trustee's duty to advise the Chair of the National Executive Committee at the start of any meeting if the Trustee has any potential conflicts of interest affecting any matters on the agenda for that meeting, and the nature of such conflict.**

If a Trustee is likely to benefit directly or indirectly from a decision of the National Executive Committee, **they should refrain from involvement in discussion or decision-making on that subject-matter and will not be counted in the quorum.** Examples would be where a Trustee is also a director or significant shareholder of a company with which the National Executive Committee is discussing a contract.

The same applies if a Trustee faces any other conflict of interest.

If an item under discussion might affect a Trustee indirectly, e.g. where it affects all or a number of users of the charity's services in the same way, then the Trustee may participate in discussion on, and decision-making in relation to, that benefit.

If a Trustee fails to declare an interest known to the Chair, the Company Secretary or any other Trustee, then they may disclose such interest on the Trustee's behalf.

Ultimately, the Chair will decide, if necessary after consulting fellow-Trustees, whether a Trustee has a conflict of interest, whether that Trustee should be permitted to participate in discussions and decisions on any given subject and whether they should be counted in the quorum.

The minutes of any meeting at which a conflict of interest is declared will record:

- The nature of the interest;
- An outline of the discussion;
- The actions taken to manage the conflict.

**Trustees with a declared conflict of interest will not be authorised as signatories to either contracts or invoices connected with such conflict.**

**In the case of a substantial and persistent conflict of interest which seems likely to damage the interests of the charity, the Chair may ask a Trustee to remove the conflict, if necessary by resigning his position as Trustee.**

### **Where authority is needed from the Charity Commission**

If the Trustee board has identified a conflict of interest, the first thing to do is to find out whether or not the trustee or trustees involved will receive a material benefit from the conflict of interest and, if

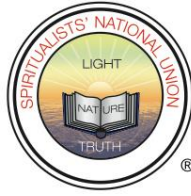
so, whether the benefit is authorised in the charity's governing document. If the governing document does provide authority, the Trustee board must ensure that the authority is used appropriately and that the necessary arrangements are in place to manage the conflict of interest.

If the benefit from which the conflict of interest arises is not authorised by the charity's governing document, the trustees will need to apply to the Charity Commission for the necessary authority. If the trustees are in any doubt about whether the governing document contains sufficient authority, we will take professional advice.

In order for the Charity Commission to consider authorising the benefit, trustees will need to show why it is in the **charity's** best interests to permit the benefit and resulting conflict of interest. Trustees also need to ensure that the charity has adequate procedures in place to manage the conflict of interest transparently once the benefit has been authorised.

### **Reporting Benefits to Trustees**

All benefits received by Trustees will be disclosed in the Annual Report.



# Spiritualists' National Union

## Code of Conduct

The Spiritualists' National Union (SNU) recognises the importance of credibility, integrity and trustworthiness to our success as a charity and a business and the significance of promoting the highest ethical principles in every aspect of what we do and how we do it. Our core values are founded upon ethical principles that promote honesty, fairness and respect for individuals and community freedoms. Our vision is to work towards a more healthy, equitable, inclusive, safe and sustainable world with particular focus on reaching out to poor and vulnerable people.

We acknowledge that our success is very much dependent on the qualities and attributes of our employees and associates <sup>(1)</sup> and that living up to both the letter and the spirit of our core aims is not always an easy task. Our work takes us into diverse and fragile countries and we recognise that, while there is some level of agreement the world over on what constitutes honest and ethical business practice, there can also be valid differences of opinion.

In our working lives we may experience situations where the correct approach and behaviour is not immediately apparent due to conflict arising from loyalties to our colleagues, managers, customers, suppliers, our families, our communities and the environment. Meeting our competitive challenges and embracing opportunities can place pressure on employees and associates at every level of the organisation. However, the pressure to succeed can never be an excuse for making decisions that would compromise our core values or code of conduct.

### Purpose

The purpose of this Code of Conduct is to develop and maintain a standard of conduct that is acceptable to the organisation, customers, suppliers, other employees, associates and all stakeholders. The expectations and acceptable behaviour relating to specific areas of legal compliance are reflected in our policies and procedures in the Employee Handbook.

This Code provides employees and associates with guidance on expected standards when conducting business on behalf of the SNU. It is essential that everyone takes responsibility to maintain our reputation for integrity. Everyone should act honestly, fairly and with transparency and should be loyal to the SNU when undertaking their work.

This Code of Conduct is only a guide, as employees and associates of ethical organisations do not engage in ethical behaviour simply because they have been issued with a Code of Conduct. Employees and associates at the SNU engage in ethical behaviour because they truly desire to work in an ethical environment, one where ethical behaviour surrounds them and influences their actions. We perceive our organisation as one where our employees and associates do the right thing even when no one is looking or watching.

### Scope

The Code applies to all SNU employees, associates and temporary personnel, agents, partners and contractors. We expect our suppliers to adhere to this Code or adopt similar ethical standards. Working at the SNU puts you in a position of trust and responsibility to uphold our ethical values when dealing with colleagues, customers, suppliers, the environment and our local communities.

## **Principles and Company Values**

Our work is based on values of independence, evidence, creative thinking and innovation and community engagement. Trust is crucial to our success; trust is earned from others as a result of our commitment to our values and the ethical manner in which we behave. Our key principles include:

- Complying with the applicable laws and regulations in all countries in which we operate
- Conducting ourselves in a professional manner with the highest standards of honesty and integrity
- Following company policies and procedures
- Working with our suppliers, third parties and agencies to ensure that our high ethical standards are maintained
- Respecting different cultures, creeds and belief systems
- Commitment to being environmentally responsible and to the conservation of biodiversity
- If in doubt, seeking guidance to ensure that we always do the right thing

The principles in this Code are intended to help guide you in the normal course of your work but are not a substitute for common sense and proper internal consultation. All employees and associates are required to adhere to the Code of Conduct and the policies it refers to. We all have a responsibility to protect the organisation's reputation in everything we do and say.

If you find yourself in a situation where you are unsure of the right course of action to take, you may find it helpful to ask yourself the following questions:

Is it legal?

Is it ethical?

Is it consistent with SNU policies and this Code of Conduct?

Would I feel comfortable if it appeared in a newspaper?

If you require more information or are unsure of the right course of action to take, if you suspect someone else of acting contrary to this Code, or if you do not understand anything, then refer to your Employee Handbook or speak to your line manager.

## **Breach of this Code**

Any breach of this Code may be considered to be a disciplinary matter and could result in disciplinary action up to and including dismissal or removal from an appointed volunteer position. Ensure that you read and thoroughly understand and act in accordance with the Code and the various policies embedded in it. We want you to understand why this is important and what is expected of you.

## **Equality and Diversity**

Employees and everyone who interacts with the SNU have a right to be treated with fairness and equity. Employees are therefore required to comply with the Equality and Diversity Policy and, in particular, take personal responsibility to prevent their behaviour having an unfair discriminatory effect, irrespective of the intention behind their behaviour.

### *Further Information*

Equality and Diversity Policy

Equality and Diversity Awareness Guidance

## **Fire, Health & Safety**

Together we have a shared responsibility to maintain a healthy and secure workplace. Employees have a duty to take reasonable care of their own health and safety and a responsibility for the health and safety of others who may be affected by their activities. Each of us has a responsibility for safety in the workplace.

### *Further Information*

Health and Safety Policy, Risk Assessments and Fire Drill procedures

## **Contact with the Media**

Only personnel who are authorised to engage with the media should handle enquiries from the media. The unauthorised passing of privileged or confidential information to the media or other third parties may lead to disciplinary proceedings. If you receive contact from the media, please inform your manager or director so that they can deal with it appropriately.

### **Resources**

SNU resources should be used solely in respect of its business and charitable work; employees and associates should ensure the proper, economical, efficient use and safekeeping of company resources.

Before taking company property offsite employees should ensure that they have obtained authority from the line manager.

### **IT and Communication Systems**

SNU IT and communication systems are provided to enable employees to undertake their responsibilities effectively. Improper use of SNU computers, computer networks and internet connections may be regarded as a disciplinary offence. The SNU will monitor network traffic and computer use and unacceptable use which is found will be investigated.

#### *Further Information*

IT Communication and Monitoring Policy.

### **Financial Propriety**

The SNU *has a 'zero-tolerance' approach to fraud* and aims to foster an environment where opportunities for fraud are minimised and enable employees and associates to feel able to report suspicions of fraud. We remain committed to investigating cases of alleged fraud, recovering lost assets and taking action against perpetrators of fraud.

Employees and associates have a contractual obligation:

- To use SNU funds and other resources under their control only for the purposes for which they are provided
- To manage these resources with probity
- Not to benefit from personal gifts or hospitality attributable to their employment that may compromise, or be thought to compromise, their integrity
- Not to make a profit secretly from their employment activity
- To avoid waste or extravagance
- To report any suspected instances of irregularity, impropriety or fraud

#### *Further Information*

Anti-corruption and Bribery Policy

### **Confidentiality**

All employees and associates have a duty to protect confidential information and not divulge this to unauthorised persons, either internal or external to the SNU. Confidential information should only be removed from the office with necessary authorisation and with appropriate data protection safeguards in place.

The duty to observe requirements of confidentiality continues when an employee is no longer working for the SNU.

#### *Further Information*

Data Protection Policy

Data Protection Act Guidelines

Data Protection Breach Policy

Information Security Policy

Record Retention and Disposal Policy

Data Protection Awareness Training

### **Social Networking Sites**

The SNU recognises that employees and associates may use blogs or social networking sites in their personal time, both in and outside of work. You should be aware that information posted on these sites is public and may be viewed by colleagues, customers or other stakeholders. You have general obligations to act in the best interests of the company and not breach company confidentiality or the relationship of trust and confidence that exists between you and the company.

*Further Information*  
Social Media Policy

### **Environment**

The SNU is committed to run efficient operations that minimise waste and reduce negative effect of its business activities on the environment. We expect all employees and associates to adhere to these standards and take positive action to comply with our accreditation.

*Further Information*  
Environment Policy and Procedures

### **Conflicts of Interest**

Employees must declare to their manager any financial or non-financial interests that a reasonable person might conclude were in conflict of the interests of the SNU. Associates should inform their DC President or the Chief Administrative Officer.

*Further Information*  
SNU Employee Handbook, Policies and Procedures

### **External Activities**

As a general rule the SNU will not concern itself with the conduct of employees outside work. However, activities and/or misconduct outside work which impact adversely on an employee's work performance or the company's reputation may result in disciplinary action.

Any employee or associate who is the subject of any criminal proceedings or who becomes bankrupt or insolvent must disclose this to their line manager (employees) or the Chief Administrative Officer (associates).

### **Employees**

The SNU recognises that it is in its interest to be an employer of choice and we can achieve this through a positive, responsible, open and welcoming environment. We will treat our employees fairly and impartially, without prejudice, and never tolerate harassment or bullying in any form. Employees are expected to be open, honest and courteous and to treat each other with dignity.

The SNU will provide employees with opportunities to enhance their skills and help them to develop fulfilling careers and maximise their contribution to our business.

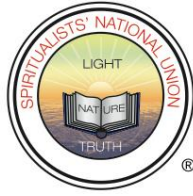
Our Grievance Policy and Procedure outlines and provides access to an employee to resolve any concerns they may have and clarifies what happens in the event that an employee is unable to resolve a concern satisfactorily with their line manager.

We are committed to honouring the terms and conditions of employment and require all employees to do the same. We are also committed to providing fair pay, benefits and terms and conditions of employment and, where required, to seeking agreement for changing these when necessary to meet business objectives. A failure to treat employees properly can breach employment laws and may also lead to disciplinary proceedings.

The SNU values its employees and their diversity.

*Further Information* - Employee Handbook, Policies and Procedures

<sup>(1)</sup> Associates include Individual Members, Church Members and any person appointed as a volunteer at any level within the SNU.



# Spiritualists' National Union

## Anti-Bribery & Anti-Corruption Policy

### 1 What does this policy cover?

- 1.1 This anti-bribery policy exists to set out the responsibilities of the Spiritualists' National Union (SNU) and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.
- 1.2 It also exists to act as a source of information and guidance for those working for the SNU. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

### 2 Policy statement

- 2.1 The SNU is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. The SNU has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever we operate.
- 2.2 The SNU will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.
- 2.3 The SNU recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

### 3 Who is covered by this policy?

- 3.1 This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside the UK). The policy also applies to Officers, Trustees, Board and/or Committee members at any level, including those volunteers elected or appointed to Church Committees, Pioneer Centre Management, District Councils, Standing Committees and sub-committees.
- 3.2 In the context of this policy, 'third-party' refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies – this includes their advisors, representatives and officials, politicians and public parties.
- 3.3 Any arrangements our company makes with a third-party are subject to clear contractual terms, including specific provisions that require the third-party to comply with minimum standards and procedures relating to anti-bribery and corruption.

## 4 Definition of bribery

- 4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so as to induce or influence an action or decision.
- 4.2 A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.
- 4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
- 4.4 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third-party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or an act of hospitality, they must seek further advice from the SNU Officers.

## 5 What is and what is NOT acceptable

- 5.1 This section of the policy refers to four areas:

Gifts and hospitality  
Facilitation payments  
Political contributions  
Charitable contributions

- 5.2 Gifts and hospitality

The SNU accepts normal and appropriate gestures of hospitality and goodwill (whether given to or received from third parties) so long as the giving or receiving of gifts meets the following requirements:

It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.

It is not made with the suggestion that a return favour is expected.

It is in compliance with local law.

It is given in the name of the company, not in an individual's name.

It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).

It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).

It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.

It is given/received openly, not secretly.

It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.

It is not above a certain excessive value, as predetermined by the SNU Officers.

It is not offered to, or accepted from, a government official or representative or politician or political party without the prior approval of the SNU Officers.

- 5.3 Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the SNU Officers, who will assess the circumstances.
- 5.4 The SNU recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- 5.5 As good practice, gifts given and received should always be disclosed to the SNU Officers. Gifts from suppliers should always be disclosed.
- 5.6 The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the SNU Officers should be sought.

- 5.7 Facilitation Payments and Kickbacks - The SNU does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low-level officials with the intention of securing or speeding up the performance of a certain duty or action.
- 5.8 The SNU does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.
- 5.9 The SNU recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

Keep any amount to the minimum.

Ask for a receipt, detailing the amount and reason for the payment.

Create a record concerning the payment.

Report this incident to your line manager.

#### 5.10 Political Contributions

The SNU will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise that this may be perceived as an attempt to gain an improper business advantage.

#### 5.11 Charitable Contributions

The SNU accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Churches should remember that their charitable status requires that events held to benefit another charity must be correctly advertised.

#### 5.12 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

#### 5.13 We will ensure that all charitable donations made are legal and ethical under local laws and practices and that donations are not offered/made without the approval of the SNU Officers.

## 6 Employee Responsibilities

- 6.1 As an employee of the SNU, you must ensure that you read, understand and comply with the information contained within this policy and with any training or other anti-bribery and corruption information you are given.
- 6.2 All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- 6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.
- 6.4 If any employee or elected/appointed volunteer breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct or removal from a voluntary position. The SNU has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## 7 What happens if I need to raise a concern?

### 7.1 This section of the policy covers three areas:

How to raise a concern

What to do if you are a victim of bribery or corruption

Protection

- 7.2 How to raise a concern  
If you suspect that there is an instance of bribery or corrupt activities occurring in relation to the SNU, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, who will then refer the matter to the SNU Officers.
- 7.3 The SNU will familiarise all employees with its whistleblowing procedures so that employees can vocalise their concerns swiftly and confidentially.
- 7.4 What to do if you are a victim of bribery or corruption  
You must tell the Officers as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.
- 7.5 Protection  
If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, the SNU understands that you may feel worried about potential repercussions. The SNU will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.
- 7.6 The SNU will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.
- 7.7 Detrimental treatment refers to dismissal, disciplinary action, threats or unfavourable treatment in relation to the concern the individual raised.
- 7.8 If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager, who will inform the SNU Officers.

## **8 Training and communication**

- 8.1 The SNU will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy and will be asked annually to formally accept that they will comply with this policy.
- 8.2 The SNU's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners and any third parties at the outset of business relations and as appropriate thereafter.
- 8.3 The SNU will provide relevant anti-bribery and corruption training to employees, etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

## **9 Record-keeping**

- 9.1 The SNU will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

## **10 Monitoring and reviewing**

- 10.1 The SNU's Officers are responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy and effectiveness.
- 10.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- 10.3 Any need for improvement will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the SNU Officers.

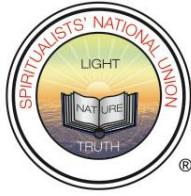
- 10.4 This policy does not form part of an employee's contract of employment and the SNU may amend it at any time so as to improve its effectiveness at combating bribery and corruption.

**Schedule to Anti-Corruption & Bribery Policy**  
**Potential Risk scenarios: "Red flags"**

The following is a list of possible red flags that may arise during the course of the employee working for the employer and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If an employee encounters any of these red flags while working for the employer, the employee must report them promptly to their manager: -

- (a) the employee becomes aware that a third-party engages in, or has been accused of engaging in, improper business practices;
- (b) the employee learns that a third-party has a reputation for paying bribes or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- (c) a third-party insists on receiving a commission or fee payment before committing to sign up to a contract with the employer or carrying out a government function or process for us;
- (d) a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement or to provide an invoice or receipt for a payment made;
- (e) a third-party request that payment is made to a country or geographic location different from where the third-party resides or conducts business;
- (f) a third-party request an unexpected additional fee or commission to "facilitate" a service;
- (g) a third-party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (h) a third-party request that a payment is made to "overlook" potential legal violations;
- (i) a third-party request that the employee provide employment or some other advantage to a friend or relative;
- (j) the employee receives an invoice from a third-party that appears to be non-standard or customised;
- (k) a third-party insists on the use of side letters or refuses to put terms agreed in writing;
- (l) the employee notices that we have been invoiced for a commission or fee payment that appears large, given the service stated to have been provided;
- (m) a third-party request or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to the employer;
- (n) the employee is offered an unusually generous gift or offered lavish hospitality by a third-party.



## **Spiritualists' National Union**

### **Prevention of Fraud in Churches**

All churches need to be aware of the possibility of fraud. Following the advice below will help to keep the risk of this happening in your church to a minimum. Most of these suggestions are included in the Rules for Churches and the Treasurers' Handbook.

#### **Approving purchases**

1. Have an approval process for purchases agreed by the Committee.
2. Three quotations for refurbishment/repairs and high-expense purchases should ALWAYS be acquired, in order that the Committee may judge best value. Large expenditure should be discussed and agreed at Committee meetings. Ensure that the Rules for Churches regarding high-expense items are followed.

#### **Making payments and signing cheques**

3. It is important that two individuals sign cheques from the three individuals nominated with your bank. N.B. Signatories should not come from the same family. Signatories of cheques must not be the person authorising the expense.
4. All disbursements should be made by pre-numbered cheque and must be accounted for on a weekly basis.
5. Back-up documents should always be kept. Every cheque or payment should have written documentation to back it up (e.g. cheque request/receipt/invoice).
6. Invoices and cheque requests must be marked 'Paid' with date and cheque number and filed.
7. Do not sign blank cheques in advance and do not use signature stamps.
8. Bank reconciliations should be approved by someone not authorised to sign cheques or make deposits and should be done promptly. Look for cheques out of sequence.

#### **Keep excellent records, including a cash book**

9. Require those responsible for the handling of money to take regular holidays from duty each year and have someone else fulfil the duties during that time. Consider resistance to such holidays as a red flag.
10. All money received should be entered into the cash book. Have two different cash counters at every service and ensure that they complete full details in a duplicate book and obtain the necessary signatures for payments made (speakers' fees, etc.). Ensure that both sign all paperwork. It is always best to give a duplicate receipt for cash, otherwise there is no proof that the person has received the money.

#### **Make regular deposits of monies**

11. Deposit money/cheques at the bank regularly, leaving only a small amount of petty cash in the church. Petty cash should be locked away, ideally in a safe. N.B. Cash income should always be banked and not put in the petty cash tin.

#### **Regular reporting to the Committee**

12. The Committee should ensure that the church Treasurer provides a full report at all Committee meetings. This should include income, expenditure and details of all bank accounts held by the church. This information should be supported by the presentation of current bank statements. All the Committee are responsible for the finances of the Church.

**Audited accounts**

13. Please be aware that if the independent examiners or accountancy firm who audit your accounts either find or suspect they have found evidence of fraudulent malpractice, charity law requires that they inform the Charity Commission about this.

**Bribery**

Churches should also be aware of the possibility of bribery, especially when dealing with contracts/agreements for major building repairs and refurbishments.

The SNU has an Anti-Bribery and Anti-Corruption Policy, which churches may refer to.

The following, taken from the above policy, is provided for information:

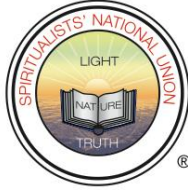
**Definition of bribery**

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so as to induce or influence an action or decision.

A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees/Trustees must not engage in any form of bribery, whether it is directly, passively, or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or an act of hospitality, they must seek further advice from the SNU Officers.



# **Spiritualists' National Union**

## **Expenses Policy**

The Spiritualists' National Union reimburses staff, trustees and volunteers for expenses incurred whilst carrying out business for the Spiritualists' National Union.

It is the responsibility of any such persons to minimise the costs incurred within the boundaries of the time available and acceptable levels of comfort.

Please note, all claimable expenses will be payable only upon production of receipts. All submissions must be made by two weeks after the end of the financial year, i.e. January 15th.

### **Staff**

#### **Travel**

1. It is recognised that car transport will often have to be used. Public transport should, however, also be considered wherever possible. Where this is the case, Economy class travel should always be the default option rather than Business or First-class travel. However, if this is unavailable, then alternative transport may be used, but only with prior authorisation from an Officer. There should be no differentiation for levels of acceptability related to the grade of staff.
2. The mileage for individual journeys in a private car will be calculated at the current rate of 40p per mile (as of 1<sup>st</sup> September 2017).

#### **Subsistence**

1. When an overnight stay away from home is unavoidable in the course of business, the cost of accommodation should be agreed beforehand with the responsible Director and will then be reimbursed. Accommodation should be sought in budget hotels / bed and breakfast accommodation.
2. During an overnight stay the cost of an evening meal will be reimbursed up to a limit of £15 (£25 in London). If breakfast is not included in the price of the accommodation, this may be reimbursed up to the limit of £10. A flat rate for meals cannot be claimed, since this would then be taxable, therefore receipts must be obtained.
3. If it is a viable option to stay overnight in the house of a friend or relative, then an amount of money will be set aside in order to buy a small thankyou gift or to pay for a meal for the host.

#### **Hospitality and meeting costs**

1. Paying for meals for guests should be the exception rather than the rule.
2. Where possible, meetings should take place within office hours and expenses other than travel should not be incurred.
3. When organising a meeting, the cost of the room should be taken into consideration.

#### **Trustees/Officers**

1. Trustees/Officers travelling to meetings and events on behalf of the Spiritualists' National Union may claim for travel expenses and subsistence provided that the requirements stated above are met.
2. An overnight stop will generally be payable where the journey is either over 80 miles each way or over 2 hours on public transport.

## **Volunteers**

1. Any volunteer travelling to events on behalf of the Spiritualists' National Union may claim for travel expenses provided that the travel arrangements meet with the requirements stated above. Subsistence and overnight expenses may also be payable but this should be agreed in advance.
2. For volunteers' meal costs can also be reimbursed up to the following limits:

Lunch £10

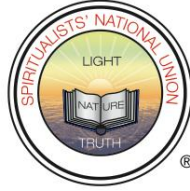
Dinner £15 (£25 in London)

If breakfast is not included in the price of the accommodation, this may be reimbursed up to the limit of £10.

N.B. A flat rate for meals cannot be claimed, since this would then be taxable, therefore receipts must be obtained.

## **Claims Procedure**

1. To make a subsistence/travel expense claim the relevant form must always be filled in fully.
2. Forms are available from Head Office.
3. Receipts or other proof of expenditure should always be attached to the claim where applicable.
4. Claims by staff and volunteers should be authorised by a Trustee/Officer.
5. Claims by a Trustee/Officer should be authorised by a different Trustee/Officer.
6. All claims should be passed to the appropriate administrative officer for processing.
7. All claims will be paid by BACS.



## **Spiritualists' National Union**

### **Internet Use and IT Monitoring Policy**

Internet access is an essential part of the day-to-day operation for business, including that of the Spiritualists' National Union (SNU).

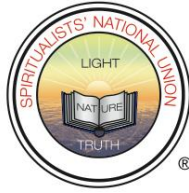
The SNU expects staff to use this facility conscientiously and only for the purpose of SNU business.

SNU will monitor the internet use by all staff on a regular basis regarding both websites accessed and email content.

Immediate disciplinary action will be taken against any member of staff found to be accessing the internet for purposes other than SNU business.

The reasons for carrying out this monitoring are: –

- Viewing of what might be called 'frivolous' websites will hamper your productivity and affect the overall efficiency of the SNU business.
- Unofficial web activity could increase the dangers of malware and other intrusions of the SNU IT systems.
- Confidential information could be made available to third parties which, whilst unintentional, could have serious consequences.



# Spiritualists' National Union

## Environmental Policy

The Spiritualists' National Union (SNU) acknowledges the connection between the climate and other environmental crises and the threat of current and future homelessness, disease, food and water shortages and poverty for millions of people around the world, as well as the major damage being caused to our natural eco-systems.

It therefore recognises its responsibility to reduce its carbon and environmental footprints and formally commits itself to being an environmentally responsible organisation.

To take this forward it commits to the following actions:

### Management

1. The SNU mandates the CEO to take executive responsibility for taking forward and implementing this commitment.

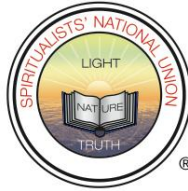
They are also requested to report annually on progress made, including statistical information on the SNU's annual:

- energy carbon footprint
- electricity
- water
- transport fuel
- gas
- total waste production
- % of waste recycled
- total paper consumption
- % recycled paper
- % renewable energy used
- any other relevant environmental criteria

This annual environmental report will be presented at the same meeting as the annual accounts.

2. The SNU's annual impact statement will include a summary of this annual environmental audit of the charity.
3. Progress on improvement of the SNU's environmental performance will be a standard item at senior management meetings.
4. All staff contracts will include a clause stating that staff will be expected to help the SNU in carrying out its aim of being an environmentally responsible organisation, in how they carry out their day-to-day duties.
5. Induction procedures for new staff will include information on the charity's environmental practices.

6. The SNU will ask all its current and future suppliers for their environmental policies and for evidence of implementation of such policies and indicate that such performance will be used as criteria for supplier selection.
7. The SNU will seek to have relevant environmental clauses included in any future contracts agreed with outside bodies.
8. The SNU will include environmental responsibility training in any future staff training programmes, especially for those involved in providing advice to vulnerable clients.
9. The SNU will observe existing environmental legislation as a minimum standard and seek to outperform current legislative requirements where practical.
10. The SNU will develop and maintain a sustainable transport policy for its staff, seeking to reduce unnecessary travel and making the transport that is necessary as sustainable as possible, and it will monitor progress annually.



## SPIRITUALISTS' NATIONAL UNION APPLICATION FOR CHURCH MEMBERSHIP

I wish to become an associate member of ..... Spiritualists' Church.

I confirm my acceptance of the seven principles detailed below. *(This acceptance indicates your resolve that Spiritualism is now your chosen religion).*

The Fatherhood of God  
The Brotherhood of Man  
The Communion of Spirits and the Ministry of Angels  
The Continuous Existence of the Human Soul  
Personal Responsibility  
Compensation and Retribution hereafter for all the Good and Evil Deeds on earth  
Eternal Progress Open to Every Human Soul

### Applicants Details

Full Name.....

Address.....

Telephone..... Email Address.....

Please give SNU Individual Membership Number if applicable.....

I declare that: –

I am not a member of an in compatible Religion

I am not presently serving a prison sentence either custodial or on licence

I am not a registered Sex Offender in any country

I do not have an unspent conviction for an indictable offence

I have no outstanding charges for an indictable offence

I have read and I accept the SNU Privacy Statement.

Signed..... Print Name .....

Date..... Associate Membership Fee Paid .....

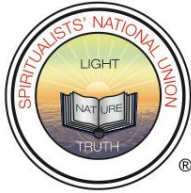
NAME OF CHURCH.....  
ADDRESS LINE 1.....  
ADDRESS LINE 2.....  
ADDRESS LINE 3.....  
ADDRESS LINE 4.....  
POST CODE.....

### For Church Use Only

Dealt with by Committee.....

Invited into Full Membership.....

Members' Roll Signed.....



## **GUIDANCE – UNACCEPTABLE BEHAVIOUR, VIOLENCE AND AGGRESSION**

On rare occasions in our churches we may be subject to unacceptable or aggressive behaviour. These guidelines are to support a church that finds itself in such a situation. They provide general guidance only and cannot cover specific situations.

### **SECTION 1. IMMEDIATE ACTION TO BE TAKEN**

#### **What precautions can you reasonably take?**

- Ensure that the contact details of the emergency services are displayed throughout the church.
- If possible have at least one person who has a mobile phone with them in church at all times.
- Ensure that there is a Church Incident Book to record any such occurrences.

#### **Managing the situation should one occur**

- UNDER NO CIRCUMSTANCES SHOULD YOU USE PHYSICAL CONTACT TO REMOVE THE PERSON.
- If possible, move away from hazardous areas, e.g. staircases, proximity to windows.
- Take a non-aggressive stance, with feet apart for balance, ensuring that you are more than one arm's length away from the person.
- Always treat the person with respect, calling them by name if you know it.
- Do not shout; speak in a normal tone so that the person involved can clearly hear you.
- Tell them who you are. (DO NOT give your full name only your Christian name and position in the church if you hold one).
- Speak to them to establish the cause(s) of the upset; remember, the person will, for whatever reason, have a point to make.
- Calmly ask the person to stop being disruptive and return to joining in the service or event so that it may continue.
- If they refuse, then ask them calmly to go to another area inside or outside the Church to discuss the matter; two people should always accompany them.
- Inform them that they will be asked to leave if the behaviour continues.
- Warn them that if they continue to be disruptive this may result in longer-term exclusion from the Church.
- If they refuse, then ask them to vacate the building and tell them that if they refuse, then the police will be called to escort them from the premises.
- CALL THE POLICE if they threaten or display, at any time, physical or verbal aggression, if they display or imply that they have a weapon or if they refuse to leave the church property.

### **SECTION 2. RECORDING THE INCIDENT**

Record what happened in writing as soon as possible after the event in the Church Incident Book. This should include:-

- The date, time and location of the incident.
- What activity was taking place.
- Any identifying information about the person.
- What might have caused the disruptive behaviour.
- The person's behaviour.
- What was said by the people involved and how the worker(s) and others responded.

- Assistance called (Police, Ambulance, other church personnel, etc.)
- A list of other people who witnessed the incident.

Two people who witnessed the incident should sign the report. Where possible one of the signatories should be a church committee member.

A copy of the report must be given to the President, a copy must be retained by each of the church personnel involved and a copy must be placed in the church records.

### **SECTION 3. FOLLOW-UP ACTION**

The matter must be discussed at the next Committee meeting with regard to any follow-up action needed.

The Committee may wish to send a preliminary letter of warning to the person concerned to the effect that they will be allowed access but only to the extent that they do not cause disruption or upset to the worshippers or attendees in the course of these: the letter should give them formal notice that if they continue to be guilty of causing disturbances, then they will be debarred from entry on the grounds of their known interference with peaceable worship and attendance.

It should not be referred to in terms of a blanket ban to the building. It should be phrased in terms of a warning of future refusal of entry to a service or other meeting because of clear historical evidence of known disruptive behaviour on the part of the person concerned. The evidence for such disruptive behaviour has to be clear and sufficiently weighty to justify such exclusion, which is a very serious step to take, involving as it does the denial of a person's normal right to have access to a service of public worship.

**The Spiritualists' National Union**  
Redwoods, Stansted Hall,  
Stansted Mountfitchet  
Essex CM24 8UD

01279 816363 | [www.snu.org.uk](http://www.snu.org.uk) | [snu@snu.org.uk](mailto:snu@snu.org.uk)