



Policies guidance and checklist

This information sheet provides guidance to organisations submitting eligibility questionnaires to WCVA's Active Inclusion funds, which are supported by the European Social Fund through the Welsh Government.

In order to qualify as an 'approved beneficiary' for Active Inclusion and to receive invitations to apply for grants, applicants must satisfy the requirements of the eligibility questionnaire, which includes several mandatory policies:

1. [Anti bribery policy](#)
 2. [Code of conduct](#)
 3. [Conflict of interest policy](#)
 4. [Data protection policy](#)
 5. [Environmental policy](#)
 6. [Equal opportunities policy](#)
 7. [Health and safety policy](#)
 8. [Insurance policy](#)
- Applicants also have the option to submit their [Welsh language policy](#), if they have one. If they do not, they will need to answer a question about how they provide for Welsh speakers.

All policies submitted must be signed and dated by at least two members of the governing body of the applicant (eg 'Board of Trustees', 'Board of Directors', 'Management Committee') that has the legal responsibility for the organisation's overall management.

The preferred method of ensuring this condition is complied with is to print a copy of the policy, obtain the signatures and dates, scan and upload. Alternatively, a password protected, secure digital signature may be appended to a digital document. However, editable documents, or documents to which a scanned picture of a signature has been pasted, will not be accepted.

Information on secure digital signatures may be found [here](#).

1. Anti bribery policy

An anti bribery policy should refer to **The Bribery Act 2010**.

Active Inclusion - Information sheet

The principal provisions of the Bribery Act include -:

- General offences covering the offering, promising or giving of a bribe (**active bribery**) and the requesting, agreeing to receive or accepting of a bribe (**passive bribery**)
- Discrete offences such as **bribing a foreign public official** in order to obtain or retain business or an advantage in the conduct of business
- Offences that can be committed by commercial organisations that fail to prevent bribery committed on their behalf

The policy might also mention penalties for persons or organisations involved in committing acts of bribery.

Other information the policy may contain:

- Gifts and hospitality
- Bribing officials
- Reporting concerns and outcomes

Guidance on the Bribery Act may be found [here](#)

WCVA's own anti bribery policy may be seen [here](#) and organisations are welcome to use it as a template.

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).

Please note, it is quite common for organisations to have a single policy that covers anti bribery, conduct and conflicts of interest. In this case, the same policy should be submitted against all three requirements, but it is essential that it clearly addresses all three issues.

2. Code of conduct

An organisation's code of conduct will depend on its purpose, structure, size and scope. Some of the categories that a code of conduct covers might include:

- Purpose and scope
- Organisational code of conduct
- Employee code of conduct
- General employee conduct
- Outside activities, employment, directorships
- Relationship with clients and outside agencies
- Organisation funds and other assets
- Records and communications
- Dealing with outside people
- Prompt communications
- Privacy and confidentiality

Active Inclusion - Information sheet

The code of conduct might also refer to people responsible for governing the organisation, such as trustees or directors. The policy might then include:

- A signed agreement that the trustee will abide by the rules
- Laws and policies
- Board, subcommittee and advisory panel meetings
- Confidentiality
- Improving governance
- Upholding the good name and values of the organisation
- Registration and conflict of interest
- Personal gain
- Leaving the board

Charity Commission guidance on the roles and responsibilities of charity trustees may be found [here](#).

WCVA's own code of conduct may be seen [here](#) and organisations are welcome to use it as a template.

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).

Please note, it is quite common for organisations to have a single policy that covers anti bribery, conduct and conflicts of interest. In this case, the same policy should be submitted against all three requirements, but it is essential that it clearly addresses all three issues.

3. Conflict of interest policy

An organisation's conflict of interest policy will depend on its purpose, structure, size and scope. Some of the categories that the policy covers might include:

- Introduction e.g. who the policy is for
- Registration of interests
- Identifying and dealing with conflicts of interest – financial, personal
- Declaration of interest forms
- Declaring and interest (at a board or committee) meetings
- The removal of Board and Committee members
- Discussion of funding initiatives and or grants by a panel/committee

Charity Commission guidance on managing conflicts of interest may be found [here](#).

WCVA's own conflict of interest policy may be seen [here](#) and organisations are welcome to use it as a template.

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).

Please note, it is quite common for organisations to have a single policy that covers anti bribery, conduct and conflicts of interest. In this case, the same policy should be submitted against all three requirements, but it is essential that it clearly addresses all three issues.

4. Data protection policy

A data protection policy should refer to the General Data Protection Regulation (GDPR) and **Data Protection Act 2018**.

There are some key areas, which should be covered by the policy:

1. Introduction
2. Responsibilities
3. Principles
4. Special category data
5. Security
6. Data recording and storage
7. Subject access
8. Transparency
9. Staff training and acceptance of responsibilities

There should be an introduction that explains data protection and the purpose of the policy

The policy should state that the organisation will comply with the **6 principles** of data protection:

The law requires that Personal Data must be:

- processed lawfully, fairly and in a transparent manner
- collected only for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed
- accurate and where necessary kept up to date
- not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed
- processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage

The applicant should specify how they will manage special category (sensitive) data, which includes:

- Racial or ethnic origin

Active Inclusion - Information sheet

- Political opinions
- Religious or similar beliefs
- Membership of a trade union
- Physical or mental health conditions
- Sexual life
- Commission or (alleged commission) of any offense
- Court appearances

Other points to be included:

- Data security measures, such as lockable storage
- Reference to a specific data retention policy.

The policy should:

- confirm what to do in the event of a data protection breach
- identify the data protection lead

Guidance from the Information Commissioner's Office may be found [here](#).

For further information and a template data protection policy, please contact Mair Rigby at WCVA (mrigby@wcva.cymru)

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).

Please note: evidence that an organisation has notified the Information Commissioners Office of the data they hold is not acceptable as a replacement for a written Data Protection Policy.

5. Environmental policy

There is no standard content for an environmental policy, although as a rule the policy should fulfil the following requirements:

- Introduce the organisation
- Provide a commitment for continual environmental improvement
- State a commitment to compliance with relevant environmental legislation as a minimum level of performance.
- Give a commitment to prevention of pollution

The policy should address the specific impacts of the organisation; these could include:

- Transport – encouraging public transport, cycling or car sharing
- Recycling of packaging materials
- Minimising waste
- Efficient use of water and energy
- Use of biodegradable chemicals Minimising use of solvents and lead-based paints

Active Inclusion - Information sheet

- Use of timber from sustainable (managed) forests Procedures to minimise noise disturbance to neighbours
- Phasing out of CFCs and ozone-depleting substances.

It should also:

- Remain specific to the size and nature of operations of the company
- Provide a framework for reviewing environmental objectives
- Be communicated to all relevant parties internally and externally
- Continue to be a working document with periodic (usually annually) reviews to reflect environmental performance

The environmental policy **should** acknowledge that activities have an impact on the environment and demonstrate the commitment the organisation is making towards developing and actioning an environmental plan.

It might form part of a larger Environmental Management System (EMS), which would include:

- Measurable **objectives** that the organisation hopes to achieve
- **Action points** - the practical steps taken to meet the objectives
- Identified **Indicators** that will be used to measure the success of the policy
- A time-table for **monitoring and review**.

Information about the Welsh Government's sustainable development charter may be found [here](#).

WCVA's own environmental policy may be seen [here](#) and organisations are welcome to use it as a template.

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).

6. Equal opportunities policy

An equal opportunities policy should refer to **The Equality Act 2010**, for example, by stating that the organisation is **committed to eliminating discrimination and encouraging diversity** amongst the workforce. It might also state that the organisation's workforce will be representative of all sections of society

In addition, the policy should cover its participants (these may be referred to as beneficiaries, users, clients, etc) and may list specific groups such as those affected by:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership

Active Inclusion - Information sheet

- Pregnancy and maternity
- Race
- Religious belief
- Sex
- Sexual orientation

If the organisation uses volunteers, the policy should also cover volunteers.

Other key points the policy might mention:

- Who is responsible for the overall implementation of the policy
- Recruitment and selection
- Training and organisational development
- Monitoring and evaluation of the effectiveness of the policy
- Disciplinary and grievances

Information about the Equality Act 2010 may be found [here](#).

WCVA's own equal opportunities policy may be seen [here](#) and organisations are welcome to use it as a template.

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).

7. Health and safety policy

If an organisation has five or more employees, it is a legal requirement for it to have a written health and safety policy statement. . It is also a requirement of the Active Inclusion fund, whatever the size of the organisation.

The health and safety policy statement is the starting point to managing health and safety in the workplace and sets out how providers manage health and safety in their organisation. It is a unique document that shows **who** does what; and **when** and **how** they do it.

The policy should set out how health and safety is managed within the organisation. A written statement of the policy and the organisation and arrangements for implementing and monitoring it shows staff, and anyone else, that hazards have been identified and risks assessed, eliminated or controlled.

Key points to include -:

- General statement of intent
- Duties of management committee
- Duty of employees
- Duties of the responsible person – designated health and safety person/officer
- Duties of First Aiders and Fire Wardens
- Accidents and accident reporting

- Accident prevention
- Accident Investigation
- Approved contractors
- Control of substances hazardous to health
- Display screen equipment (DSE) regulations 1992
- Electricity at work regulations 1991
- Electrical equipment
- Emergency evacuation procedures
- Fire and safety procedures
- Fire alarm system and fire prevention
- Action to be taken on discovery of a fire
- Investigation of fire
- First aid boxes and training
- Hazard reporting
- Lone working
- Home working
- Induction
- Manual handling
- Personal safety
- Pregnant workers
- Risk managers
- Safety of premises
- Security
- Smoking
- Welfare
- Young persons
- Summary

Guidance from the Health and Safety Executive on how to write a health and safety policy may be found [here](#).

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).

8. Insurance policy

Whilst an insurance policy is not part of an organisation's governing documents, it is a requirement of the Active Inclusion fund, to cover any activities that will be undertaken.

Applicants must provide the necessary insurance policies to cover any activities that are undertaken, with full details of the current insurance policy and policy number.

All insurance policies submitted must have an insurance **policy number** and an **expiry date**.

Employers Liability and **Public Liability** insurances must have a minimum level of cover of £5 million.

Active Inclusion - Information sheet

Where any additional relevant insurance policies are provided, such as professional liability, they should also have a minimum level of cover of £5 million.

Welsh language policy

It is not a requirement of the Active Inclusion eligibility questionnaire to submit a Welsh language policy, although it is very much encouraged. If no policy is provided, the organisation will have to answer the following eligibility questionnaire question to a satisfactory standard:

'As you have selected NO to having a Welsh Language Policy, please describe how you cater for Welsh language requirements, in running your organisation and in promotion.

'Do you provide face-to-face services, written information or online information in Welsh?

'We need to know about all three, but if any or none are not relevant, please explain why not (eg if it is not the language predominately used in your area or by your current participants, etc).'

A Welsh language policy should **adhere to the Welsh Language Measure 2011**. The organisation might be committed to developing a Welsh language scheme, setting out the Welsh language services that it provides, stating how and when those services will be available, and how it will ensure that the English and Welsh languages will be treated on an equal basis in public services.

While there is no legal requirement for third sector organisations to have a Welsh language scheme in place, the sector as a whole has recognised that providing a quality service in both English and Welsh is good practice and of benefit to many.

The policy should cover the **three main areas** that Active Inclusion mentions within the eligibility questionnaire:

- Published materials
- Correspondence
- Online communication

Information and guidance from the Welsh Language Commissioner may be found [here](#).

WCVA's own Welsh language policy may be seen [here](#) and organisations are welcome to use it as a template.

Third sector organisations can also contact their local county voluntary council (CVC) for help with policies and governing documents. A list of CVC contact details may be found [here](#).



UNDEB EWROPEAIDD
EUROPEAN UNION



Llywodraeth Cymru
Welsh Government

Cronfa Gymdeithasol Ewrop
European Social Fund

Active Inclusion - Information sheet

Policy checklist for Active Inclusion

Anti bribery policy

- Organisation name matches name on the policy
- Policy signed and dated by 2 members of board or managing committee
- Review and (or) expiry date provided

Code of conduct

- Organisation name matches name on the policy
- Policy signed and dated by 2 members of board or managing committee
- Review and (or) expiry date provided

Conflict of interest policy

- Organisation name matches name on the policy
- Policy signed and dated by 2 members of board or managing committee
- Review and (or) expiry date provided

Data protection policy

- Organisation name matches name on the policy
- Policy signed and dated by 2 members of board or managing committee
- Review and (or) expiry date provided

Environmental policy

- Organisation name matches name on the policy
- Policy signed and dated by 2 members of board or managing committee
- Review and (or) expiry date provided

Health and safety policy

- Organisation name matches name on the policy
- Policy signed and dated by 2 members of board or managing committee
- Review and (or) expiry date provided

Insurance policy

- Organisation name matches name on the policy
- Insurance policy provided with policy number
- Insurance policy expiry date
- Employer's liability insurance minimum cover £5 million
- Employer's liability insurance expiry date
- Public liability insurance - minimum cover £5 million
- Public liability insurance expiry date

Welsh language policy

- Organisation name matches name on the policy
- Policy signed and dated by 2 members of board or managing committee
- Review and (or) expiry date provided

NB If there is no Welsh language policy, then the appropriate question regarding Welsh language provision must be answered in full.