

## **Fitya Policy & Procedures: Engaging External Speakers at Charity Events**

### **1. Policy Statement**

Fitya is dedicated to empowering young minds by promoting social responsibility, healthy living, and cultural acceptance. All external speakers at Fitya events must reflect these values, uphold the highest ethical standards, and comply with UK charity regulations and safeguarding requirements.

### **2. Scope**

This policy applies to all Fitya-organized events (in-person or virtual) where external speakers are invited to address youth, families, or the wider community.

### **3. Objectives**

- Ensure speakers align with Fitya's mission and values.
- Safeguard the wellbeing of attendees, especially young people.
- Protect Fitya's reputation and legal compliance.
- Promote positive, inclusive, and impactful events.

### **4. Roles & Responsibilities**

<b>Role</b>	<b>Responsibilities</b>
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Event Coordinator	Oversees speaker selection, vetting, logistics, and event management.
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Trustees	Approve high-profile or sensitive speakers; review policy annually.
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Safeguarding Lead	Ensures all safeguarding checks and risk assessments are completed.
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### **5. Detailed Procedures**

#### **5.1 Speaker Selection & Vetting**

- Speakers are chosen for their expertise, relevance to the event theme, and ability to inspire youth in line with Fitya's mission.
- All requests for external speakers must be discussed with the Event Coordinator and, if necessary, the Trustees.
- Conduct background checks, including:
  - Online research for affiliations, public statements, or controversies.

- Risk assessment for safeguarding and reputational risks.
- DBS check if the speaker will have direct contact with children or vulnerable adults.
- Speakers with any links to extremism, hate speech, or activities contrary to Fitya's values will not be engaged.

## **5.2 Invitation & Agreement**

- Formal written invitations must include:
  - Event details (date, time, location, audience, purpose).
  - Fitya's mission and values.
  - Expectations for conduct and content.
- Upon acceptance, speakers sign an agreement covering:
  - Content guidelines (no incitement, hate speech, or political bias).
  - Data protection and consent for use of personal data.
  - Remuneration or expenses (if applicable).
  - Requirement to submit presentation outline and materials in advance.

## **5.3 Pre-Event Preparation**

- Speaker submits:
  - Biography and credentials.
  - Presentation outline and any handouts.
  - ID verification (passport or photo ID on event day).
- Event Coordinator conducts a risk assessment, including safeguarding and health & safety.
- Logistics (travel, accommodation, technical needs) are confirmed.

## **5.4 Event Day Management**

- Event Coordinator welcomes and briefs the speaker on:
  - Event logistics and schedule.
  - Safeguarding and conduct expectations.

- Emergency procedures.
- Speaker acts as a positive role model, avoids promoting unhealthy lifestyles (e.g., alcohol, drugs, gambling), and ensures content is inclusive and respectful.

### **5.5 Feedback & Evaluation**

- Collect feedback from attendees, staff, and volunteers on the speaker's impact and conduct.
- Review feedback to inform future speaker selection and event planning.

### **5.6 Data Protection**

- All personal data is handled in compliance with UK data protection laws.
- Obtain explicit consent for use of personal data, photos, or recordings.

### **5.7 Expenses & Remuneration**

- Speaker expenses are processed according to Fitya's volunteer expenses policy.
- Any honorarium or fee is agreed in advance and documented.

### **5.8 Review & Compliance**

- This policy is reviewed annually by the Trustees and updated as needed to reflect best practice and legal requirements.

## **6. Appendices**

### **Appendix A: Speaker Information Form**

<b>Field</b>	<b>Details to Provide</b>
Name of Speaker/Organisation	
Date of Proposed Visit	
Reason for Visit	
Presentation Outline	
Agreement to Guidelines	Signature Required
ID Verification	Passport/Photo ID on Event Day

### **Appendix B: Risk Assessment Checklist**

- Speaker's background and affiliations checked.
- Presentation content reviewed for compliance.
- Safeguarding and health & safety risks assessed.
- Controls in place for identified risks.

#### **Appendix C: Event Day Checklist**

- Speaker welcomed and briefed.
- ID checked and recorded.
- Safeguarding and emergency procedures explained.
- Feedback forms distributed.

#### **7. Key Principles for Fitya**

- **Alignment with Fitya's mission:** Inspire youth, promote healthy living, and foster cultural acceptance.
- **Safeguarding:** Prioritize the safety and wellbeing of all attendees.
- **Transparency:** Clear communication and documentation at every stage.
- **Continuous improvement:** Use feedback to enhance future events.



## **Fitya Whistleblowing Policy**

### **1. Statement of Commitment**

Fitya is committed to the highest standards of integrity, transparency, and accountability. We foster a culture where everyone—employees, directors, shareholders, contractors, and stakeholders—can safely raise concerns about wrongdoing, confident they will be protected and heard. Fitya enforces a zero-tolerance approach to retaliation: any form of victimisation, harassment, or adverse treatment against whistleblowers will result in severe disciplinary action.

### **2. Purpose and Scope**

- **Purpose:** To provide robust, accessible, and confidential channels for reporting illegal, unethical, or improper conduct, ensuring all concerns are addressed promptly and effectively.
- **Scope:** This policy applies to all Fitya employees, directors, shareholders, contractors, agency workers, and anyone acting on behalf of Fitya.

### **3. What is Whistleblowing?**

Whistleblowing is the disclosure of information by someone who reasonably believes there is wrongdoing within Fitya. This includes, but is not limited to:

- Criminal offences (such as fraud, bribery, theft)
- Breach of legal or regulatory obligations
- Miscarriage of justice
- Health and safety risks
- Environmental damage
- Discrimination, harassment, or abuse
- Deliberate concealment of any of the above

Whistleblowing is distinct from personal grievances, which should be addressed through Fitya's grievance procedures.

### **4. Protection for Whistleblowers**

Fitya provides full protection for anyone who makes a genuine disclosure. No whistleblower will suffer any detriment, victimisation, or retaliation for raising a genuine



concern in good faith. Protection applies from the first day of engagement and covers all those working with or for Fitya.

## 5. Reporting Concerns

### 5.1 How to Raise a Concern

Concerns can be raised orally, in writing, or via Fitya's secure and confidential whistleblowing hotline. Please provide:

- Background and history of the concern (including relevant names, dates, and places)
- The reason for your concern

### 5.2 Reporting Channels

- **Line Manager or Supervisor:** In most cases, raise concerns with your immediate manager.
- **Designated Whistleblowing Officer:** For serious concerns or if your manager is involved, contact the Whistleblowing Officer.
- **Board of Directors:** If the concern involves the Whistleblowing Officer, contact the Chair of the Board or another director.
- **Anonymous Hotline:** Fitya provides an anonymous whistleblowing hotline, accessible 24/7, to ensure everyone can report concerns without fear of identification.

Contact details for the Whistleblowing Officer, Board members, and hotline are available to all staff and stakeholders.

## 6. Confidentiality and Anonymity

- All disclosures are treated in strict confidence. Fitya will not reveal a whistleblower's identity without their explicit consent unless required by law.
- Anonymous disclosures are accepted and encouraged; however, providing contact details may help with follow-up and resolution.

## 7. Investigation Process

- The Whistleblowing Officer (or appropriate director) will acknowledge receipt of the concern promptly.
- An initial assessment will determine the need for a formal investigation.

- Investigations are conducted impartially, promptly, and confidentially.
- The whistleblower will be kept informed of progress and outcomes, within legal and confidentiality constraints.
- All reports and outcomes are documented and reviewed by the Board to ensure effectiveness and accountability.

## **8. Protection and Support**

- Fitya has zero tolerance for retaliation. Any attempt to victimise, harass, or retaliate against a whistleblower will result in severe disciplinary action, up to and including dismissal.
- Whistleblowers are encouraged to report any perceived retaliation immediately.
- Fitya will take all practical and reasonable steps to prevent and address victimisation, including risk assessments and ongoing support.
- Malicious or knowingly false allegations may result in disciplinary action.

## **9. Whistleblowing Champion**

Fitya appoints a Whistleblowing Champion at Board level, responsible for overseeing the integrity, independence, and effectiveness of Fitya's whistleblowing arrangements. The Champion ensures that:

- Whistleblowers are protected and supported
- The policy is regularly reviewed and improved
- Training and awareness are provided to all staff

## **10. External Disclosures**

If you believe your concern has not been properly addressed internally, or you feel unable to raise it within Fitya, you may contact relevant external bodies such as regulatory authorities or law enforcement.

## **11. Further Guidance**

For independent advice, you may contact external advisory services.

## **12. Review and Communication**

This policy is reviewed annually by the Board of Directors and the Whistleblowing Champion to ensure it remains effective, compliant, and aligned with best practice. All



staff, directors, and stakeholders are regularly trained and made aware of this policy and its procedures.





## **Fitya Privacy Notice**

### **Introduction**

Fitya is committed to protecting your privacy and ensuring the security of your personal data. This privacy notice explains how we collect, use, store, and protect your information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### **Who We Are**

- **Fitya Ltd**
- **Data Controller:** Fitya Ltd
- **Data Protection Officer (DPO):** Ahmed Ammar
- **Contact:** GDPR@fitya.org.uk, 07385 821943
- **ICO Registration Number:** [Registration Number]

### **What Personal Data We Collect**

We may collect and process the following categories of personal data:

- Contact details (name, address, email, phone number)
- Account information (username, password)
- Payment and financial details
- Professional information (job title, employer)
- Technical data (IP address, device information, usage data)
- Communications and correspondence
- Any other information you provide to us

### **How We Collect Your Data**

We collect personal data:

- Directly from you (e.g., when you register, contact us, or use our services)
- Automatically through our website (cookies, analytics)
- From third parties (e.g., payment processors, partners)

### **Purposes and Legal Bases for Processing**



We process your personal data for the following purposes and legal bases:

Purpose	Legal Basis
To provide and manage our services	Contractual necessity
To communicate with you	Legitimate interests / Consent
To process payments	Contractual necessity / Legal duty
To comply with legal obligations	Legal obligation
For marketing (with your consent)	Consent
To improve our services and website	Legitimate interests
To ensure security and prevent fraud	Legitimate interests / Legal duty

**How We Use Your Data**

- To deliver our products and services
- To respond to your enquiries and requests
- To process transactions and manage accounts
- To send you updates, newsletters, and marketing (if you opt in)
- To improve our website and services
- To comply with legal and regulatory requirements

**Data Sharing**

We may share your data with:

- Service providers and partners who process data on our behalf
- Payment processors and financial institutions
- Regulatory authorities (where required by law)
- Third parties with your consent

All third-party processors are subject to strict data protection obligations.

**International Data Transfers**

If we transfer your data outside the UK, we ensure appropriate safeguards are in place, such as adequacy decisions or standard contractual clauses.

### **Data Retention**

We retain your personal data only as long as necessary for the purposes for which it was collected, in accordance with our retention schedule. Data is securely deleted or anonymised when no longer required.

### **Your Rights**

You have the following rights regarding your personal data:

- **Right to be informed:** About how your data is used (this notice)
- **Right of access:** To request a copy of your data
- **Right to rectification:** To correct inaccurate data
- **Right to erasure:** To request deletion of your data
- **Right to restrict processing:** To limit how we use your data
- **Right to data portability:** To receive your data in a portable format
- **Right to object:** To object to certain uses of your data
- **Rights related to automated decision-making:** To request human review

To exercise your rights, contact our DPO at [Email Address].

### **Cookies and Tracking**

Our website uses cookies and similar technologies to enhance your experience, analyse usage, and deliver relevant content. You can manage your cookie preferences via your browser settings. For more details, see our Cookie Policy.

### **Data Security**

We implement appropriate technical and organisational measures to protect your data, including encryption, access controls, and regular security reviews.

### **Data Breaches**

In the event of a data breach that affects your rights and freedoms, we will notify you and the Information Commissioner's Office (ICO) as required by law.

### **Complaints**



If you have concerns about how we handle your data, please contact our DPO. You also have the right to lodge a complaint with the ICO.

### **Changes to This Notice**

We may update this privacy notice from time to time. The latest version will always be available on our website, and significant changes will be communicated to you.

### **Contact Us**

For any questions or to exercise your rights, please contact:

- **Data Protection Officer:** Ahmed Ammar
- **Email:** Ahmed.Ammar@fitya.org.uk
- **Phone:** 07385 821943
- **Address:** Iron Hall (Fitya HQ) Bolton, BL1 8DR

*This privacy notice is effective as of 30 May 2025*

## **Fitya Grievance and Disciplinary Policy**

### **1. Policy Statement**

Fitya is committed to maintaining a positive, fair, and respectful working environment. This policy sets out clear procedures for addressing grievances and disciplinary matters, ensuring all concerns are handled promptly, consistently, and with respect for all parties involved.

### **2. Purpose and Scope**

- Purpose: To provide a transparent process for resolving workplace grievances and managing disciplinary issues.
- Scope: Applies to all Fitya employees, directors, shareholders, contractors, agency workers, and anyone acting on behalf of Fitya.

### **3. Grievance Procedure**

#### **3.1 Informal Resolution**

- Employees are encouraged to raise concerns or complaints informally with their line manager as soon as possible.
- Many issues can be resolved quickly through open discussion.

#### **3.2 Formal Grievance**

- If the issue is serious or cannot be resolved informally, the employee should submit a written grievance to their manager, stating the facts and desired outcome.
- If the grievance concerns the line manager, it should be raised with a more senior manager or designated officer.

#### **3.3 Grievance Hearing**

- The manager will arrange a meeting, usually within 5 working days, to discuss the grievance.

- The employee has the right to be accompanied by a colleague or representative.
- After the meeting, the manager will provide a written decision, normally within 24 hours. If more time is needed, the employee will be informed of the revised timescale.

### 3.4 Appeal

- If dissatisfied with the outcome, the employee may appeal in writing.
- An appeal meeting will be arranged, usually within 5 working days, with a more senior manager or director.
- The employee may again be accompanied.
- The decision after the appeal is final.

## 4. Disciplinary Procedure

### 4.1 Informal Action

- Minor issues of conduct or performance may be dealt with informally through discussion, support, and guidance.
- Where appropriate, training or a development plan may be offered.

### 4.2 Formal Disciplinary Action

- For more serious or repeated issues, a formal disciplinary process will be initiated.
- The employee will be informed in writing of the alleged misconduct or performance issue and invited to a disciplinary meeting.
- The employee has the right to be accompanied by a colleague or representative.

### 4.3 Investigation

- A fair and thorough investigation will be conducted before any disciplinary action is taken.

- The employee will have the opportunity to respond to the allegations and present evidence.

#### 4.4 Disciplinary Hearing

- At the hearing, the case will be reviewed and the employee can state their case.
- Possible outcomes include:
  - No action
  - Verbal or written warning
  - Final written warning
  - Dismissal (in cases of gross misconduct)
  - Other appropriate sanctions

#### 4.5 Appeal

- The employee may appeal any disciplinary decision in writing.
- An appeal hearing will be arranged with a more senior manager or director not previously involved.
- The outcome of the appeal is final.

### 5. Examples of Misconduct and Gross Misconduct

Misconduct (may lead to warning)      Gross Misconduct (may lead to dismissal)

Minor breaches of rules

Theft, fraud, or bribery

Poor timekeeping

Physical violence or threats

Minor insubordination

Gross negligence

Failure to follow procedures

Serious insubordination

Unauthorised absence

Breach of confidentiality

Misconduct (may lead to warning) Gross Misconduct (may lead to dismissal)

Discrimination, harassment, or abuse

## 6. General Principles

- All matters will be handled confidentially and impartially.
- Records of all proceedings will be kept securely.
- No employee will be subject to detriment for raising a genuine grievance or for participating in disciplinary proceedings.
- Malicious or knowingly false allegations may result in disciplinary action.

## 7. Review and Communication

This policy will be reviewed annually by the Board of Directors and communicated to all staff and stakeholders. Training and support will be provided to ensure understanding and effective implementation.



## Fitya Financial Management Policy

### 1. Introduction

This Financial Management Policy establishes the framework for managing Fitya’s finances with transparency, accountability, and compliance. It is tailored to Fitya’s structure, mission, and legal context, and is designed to protect assets, ensure responsible stewardship, and build stakeholder trust<sup>12</sup>.

### 2. Objectives

- Ensure all financial activities support Fitya’s mission and strategic goals.
- Maintain robust internal controls and clear accountability.
- Comply with all statutory, donor, and regulatory requirements.
- Provide accurate, timely, and transparent financial reporting.
- Safeguard Fitya’s assets and reputation.

### 3. Roles and Responsibilities

Role	Responsibilities
Board of Trustees	Approves policy, budgets, major expenditures, and contracts; oversees compliance.
Treasurer	Oversees financial management, reporting, and audits.
Executive Director	Manages day-to-day finances, authorizes payments, maintains records.
Finance Committee	Reviews reports, budgets, and policy compliance.
Staff/Accountants	Processes transactions, maintains records, prepares reports.

### 4. Financial Records

- Maintain accurate, up-to-date records in line with UK law and best practice.
- Use approved accounting software; retain all supporting documents (invoices, receipts, contracts) for at least 7 years.
- Segregate restricted, unrestricted, and designated funds in records.

## **5. Budgeting**

- Prepare an annual budget before each financial year; Board approval required.
- Budgets must be realistic, based on sound assumptions, and aligned with Fitya's objectives.
- Monitor actual income and expenditure monthly; report variances to the Board.
- Revise budgets as needed, with Board approval for significant changes.

## **6. Banking and Cash Management**

- All bank accounts must be in Fitya's name; Board approval required to open/close accounts or change signatories.
- At least two authorized signatories required for all transactions; no blank cheques or pre-signed payments.
- Monthly bank reconciliations are mandatory.
- Petty cash is limited to £200; all cash payments must be recorded in a petty cash book and reconciled monthly.

## **7. Income Management**

- All income (donations, grants, fundraising) must be promptly recorded and banked.
- Issue receipts for all donations; maintain a register of income sources.
- Gift Aid claims must be managed in compliance with HMRC rules.
- Fundraising activities must be approved by the Board and comply with relevant laws.

## **8. Expenditure Management**

- All expenditures must be authorized according to agreed limits:
  - Up to £500: Executive Director
  - £501–£2,500: Treasurer or Finance Committee
  - Over £2,500: Board approval
- Payments require original invoices/receipts; no payments without documentation.
- Use bank transfer as the preferred method; cheques only if necessary.

- All credit card and online payments must be pre-approved and reconciled monthly.

## **9. Procurement and Contracts**

- Obtain at least two competitive quotes for purchases over £1,000.
- Contracts over £5,000 require Board approval.
- Maintain a register of all contracts and service agreements.

## **10. Asset Protection**

- Insure all assets against theft, loss, and liability.
- Maintain an asset register; record and depreciate assets over their useful life.
- Protect intellectual property and confidential information from unauthorized access.

## **11. Financial Transactions with Insiders**

- No loans or advances to staff, trustees, or volunteers.
- Reimburse only direct, necessary expenses with proper documentation.
- All related-party transactions must be disclosed and approved by the Board.

## **12. Reporting**

- Prepare monthly management accounts for the Board and Finance Committee.
- Annual financial statements must be independently examined or audited.
- Submit statutory returns to the Charity Commission and HMRC on time.
- Provide financial reports to donors as per grant agreements.

## **13. Internal Controls**

- Segregate duties: no individual may authorize, process, and record the same transaction.
- Regular internal reviews and annual external audits.
- All financial policies reviewed at least annually and updated as needed.

## **14. Risk Management**

- Conduct annual risk assessments covering financial, operational, and compliance risks.

- Maintain a reserve fund policy to ensure financial sustainability.
- Develop contingency plans for financial emergencies.

#### **15. Policy Adoption and Training**

- This policy is approved by the Board and reviewed annually.
- All staff, trustees, and volunteers receive training on financial procedures.
- The policy is accessible to all stakeholders.

#### **Policy Statement:**

Fitya is committed to the highest standards of financial management, ensuring that all resources are used effectively, transparently, and in accordance with legal and donor requirements. All staff, trustees, and volunteers must adhere to this policy in the conduct of their financial duties<sup>12</sup>.

*This policy should be reviewed and customized further with input from Fitya's Board, Treasurer, and legal advisors to ensure full alignment with Fitya's unique needs and regulatory environment.*



## **Fitya Equality, Diversity, and Inclusion (EDI) Policy**

### **1. Introduction**

Fitya is a community-focused organisation dedicated to serving and empowering minority communities. Our Equality, Diversity, and Inclusion (EDI) Policy is a living document, designed to ensure that every aspect of our work is underpinned by fairness, respect, and opportunity for all. We recognise that true inclusion requires ongoing commitment, self-reflection, and action at every level of our organisation.

### **2. Policy Statement**

Fitya is unequivocally committed to promoting equality, celebrating diversity, and fostering inclusion. We believe that everyone—regardless of race, ethnicity, religion, gender, sexual orientation, age, disability, socio-economic status, or any other characteristic—has the right to participate fully and safely in our organisation and to access our services without fear of discrimination, harassment, or exclusion. We are proactive in challenging systemic inequalities and are dedicated to creating an environment where all voices are heard and valued.

### **3. Purpose and Scope**

#### **3.1 Purpose**

- To embed EDI principles into every aspect of Fitya's governance, operations, and service delivery.
- To ensure that all staff, volunteers, trustees, service users, and partners experience dignity, respect, and fairness.
- To go beyond legal compliance, actively dismantling barriers and addressing systemic inequalities.

#### **3.2 Scope**

- This policy applies to all employees, volunteers, trustees, contractors, partners, and service users.
- It covers all organisational activities, including recruitment, employment, volunteering, service provision, procurement, partnerships, and community engagement.

### **4. Legal and Ethical Framework**

- Fitya complies with the Equality Act 2010, Human Rights Act 1998, and all relevant UK and international legislation.
- We address not only protected characteristics but also intersectional and systemic barriers, including socio-economic status, caring responsibilities, and other forms of disadvantage.
- Our approach is informed by best practice from leading charities and NGOs, ensuring we remain at the forefront of EDI innovation.

## **5. Our Commitments**

### **5.1 Recruitment, Employment, and Volunteering**

- **Fair and Inclusive Recruitment:**
  - All vacancies are advertised widely and accessibly, using diverse channels to reach underrepresented groups.
  - Job descriptions and person specifications are reviewed to remove unnecessary barriers.
  - Anonymous shortlisting and structured interviews are used to minimise bias.
  - Reasonable adjustments are proactively offered to disabled applicants and those with specific needs.
  - Positive action is taken where appropriate to address underrepresentation.
- **Equitable Progression:**
  - Career development, pay, training, and promotion are monitored for equity.
  - Barriers to progression are identified and removed through targeted support and mentoring.
  - Flexible working arrangements are available to support carers, parents, and those with additional needs.
- **Inclusive Workplace Culture:**
  - All staff and volunteers are expected to uphold EDI values in their daily work.
  - Employee and volunteer networks (e.g., for race, disability, LGBTQ+, carers) are supported to provide peer support and inform policy.

### **5.2 Service Delivery**

- **Culturally Competent Services:**

- Services are co-designed with minority communities to ensure cultural sensitivity, accessibility, and relevance.
- Regular consultation, focus groups, and feedback mechanisms are in place to ensure services meet the evolving needs of our communities.
- Information is provided in multiple languages and accessible formats.

- **Removing Barriers:**

- We identify and address obstacles to participation, including language, digital access, and physical accessibility.
- Outreach is tailored to engage those who may be excluded or marginalised.

- **Safeguarding and Wellbeing:**

- Safeguarding policies are robust and inclusive, recognising the specific risks faced by minority and marginalised groups.
- Mental health and wellbeing support is available to all staff, volunteers, and service users.

## **5.3 Leadership and Governance**

- **Diverse and Inclusive Leadership:**

- Trustees and senior leaders reflect the diversity of the communities we serve.
- Board diversity is regularly audited, and gaps are addressed through targeted recruitment and co-option.
- EDI is a standing agenda item at Board meetings, and progress is regularly reviewed.

- **Accountability:**

- The Board and a designated EDI Lead are responsible for policy implementation, monitoring, and reporting.
- EDI objectives are built into organisational strategy and individual performance appraisals.

## **6. Embedding EDI in Organisational Culture**

### **6.1 Training and Development**

- **Mandatory Training:**

- All staff, volunteers, and trustees receive comprehensive EDI training at induction and at least every three years.
- Training covers unconscious bias, anti-discrimination, cultural awareness, inclusive leadership, and safeguarding.
- Specialist and refresher training is provided for those in recruitment, management, and frontline roles.

- **Ongoing Development:**

- EDI learning objectives are built into personal development plans.
- Staff and volunteers are encouraged to participate in external EDI events, conferences, and networks.

## **6.2 Inclusive Networks and Support**

- Employee and volunteer networks are supported to provide peer support, raise awareness, and inform policy.
- Regular forums and open meetings are held to discuss EDI issues and share best practice.

## **7. Monitoring, Reporting, and Continuous Improvement**

### **7.1 Data Collection and Analysis**

- We collect and analyse diversity data (age, disability, gender, race, etc.) across recruitment, retention, progression, and service use.
- Data is used to identify trends, monitor progress, and inform targeted action to address underrepresentation and disadvantage.
- All data is handled in accordance with data protection legislation and best practice.

### **7.2 Equality Impact Assessments**

- All new policies, projects, and services undergo equality impact analysis to identify and mitigate potential inequalities.
- Impact assessments are reviewed regularly and updated as necessary.

### **7.3 Transparent Reporting**



- Progress against EDI objectives is published annually and shared with staff, volunteers, and the communities we serve.
- Key findings and actions are communicated in accessible formats.

## **8. Dealing with Complaints, Suggestions, and Breaches**

### **8.1 Accessible Complaints Procedure**

- Anyone can report discrimination, harassment, or unfair treatment through multiple channels (line manager, HR, anonymous reporting, EDI Lead).
- Complaints are investigated promptly, impartially, and confidentially.
- Support is available for those raising or affected by complaints.

### **8.2 Zero Tolerance**

- Proven breaches of this policy result in disciplinary action, up to and including dismissal or removal from volunteer/trustee roles.
- All staff, volunteers, and trustees are made aware of the consequences of non-compliance.

### **8.3 Learning from Feedback**

- Suggestions for improvement are actively encouraged and used to inform policy and practice.
- Outcomes and actions are communicated to all stakeholders.

## **9. Community Engagement and Co-Production**

- Fitya regularly consults with minority communities, using surveys, focus groups, and open meetings to shape services and policies.
- Community representatives are involved in decision-making, ensuring authentic representation and accountability.
- Partnerships are developed with other organisations to share best practice and amplify impact.

## **10. Review and Accountability**

- This policy is reviewed at least annually, or sooner if required by changes in law, best practice, or community needs.
- Reviews involve consultation with staff, volunteers, and community stakeholders.

- Fitya publishes its EDI progress and welcomes scrutiny from all stakeholders.

## **11. Appendices**

### **11.1 Definitions**

<b>Term</b>	<b>Definition</b>
Equality	Ensuring everyone has equal opportunity and is not treated differently or discriminated against.
Diversity	Recognising, respecting, and valuing differences in people.
Inclusion	Creating an environment where everyone feels welcome, respected, and able to participate fully.
Protected Characteristics	Characteristics protected by law (e.g., age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex, sexual orientation).

### **11.2 Related Policies**

- Safeguarding Policy
- Whistleblowing Policy
- Grievance and Disciplinary Policy
- Data Protection Policy

### **11.3 Useful Contacts**

- EDI Lead: Anas Habib
- HR Department:
- Anonymous Reporting Channel: fill this form link

**Fitya is dedicated to being a safe, inclusive, and empowering space for all. Our commitment to equality, diversity, and inclusion is uncompromising and central to our mission. This policy is informed by best practice from leading UK charities and NGOs, including Scope, RNIB, and Essex Wildlife Trust.**

## Campaigns and Political Activity Policy and Procedures

### Purpose

This policy sets out the principles and procedures for engaging in campaigns and political activities, ensuring that the organization remains independent, neutral, and compliant with relevant laws and best practices.

### 1. Definitions

- **Campaigning:** Activities aimed at raising awareness, educating, or mobilizing public support on specific issues, or influencing public attitudes. This includes efforts to ensure existing laws are observed.
- **Political Activity:** Actions intended to secure or oppose changes in law, policy, or decisions of government or public bodies. This includes influencing political parties, candidates, or public officials, and responding to consultations.

### 2. Policy Principles

- All campaigning and political activities must further or support the organization's charitable purposes.
- Political activity must not become the sole or primary activity of the organization.
- The organization must remain politically neutral and must not support any political party or candidate.
- Engagement with political parties or politicians is permitted only if it supports the organization's charitable purposes and maintains neutrality.
- The organization may support specific policies if they align with its objectives, but must avoid any perception of partisanship.

### 3. Roles and Responsibilities

- **Trustees:** Responsible for ensuring all activities comply with this policy and relevant laws. Trustees must assess risks and benefits before approving any campaign or political activity.
- **Staff and Volunteers:** Must understand and adhere to this policy. Training should be provided to ensure compliance and awareness of neutrality requirements.

### 4. Procedures

#### 4.1 Planning and Approval

- All proposed campaigns or political activities must be submitted to the trustees for approval.
- Proposals should include:
  - Objectives and intended outcomes
  - Evidence base and justification
  - Duration and resource requirements
  - Risk assessment (including reputational and legal risks)
  - Methods for monitoring and evaluation

#### **4.2 Conduct**

- Activities must be conducted in a manner that upholds the organization's independence and neutrality.
- No staff or volunteers may use their position to promote personal political views.
- Participation in political activities during official duties or on organizational premises is prohibited unless explicitly approved.

#### **4.3 Engagement with Political Entities**

- The organization may engage with politicians or parties only to further its charitable purposes.
- Engagement must be balanced and not favor any party or candidate.
- All communications must be factual, accurate, and justifiable.

#### **4.4 Record-Keeping**

- Maintain clear records of all decisions, actions, and communications related to campaigns and political activities.
- Document risk assessments, approvals, and evaluations for accountability and compliance.

#### **5. Monitoring and Review**

- Regularly review the effectiveness and compliance of campaigns and political activities.
- Update this policy as needed to reflect changes in law or best practice.



- Trustees should review this policy at least every three years or after significant campaigns.

## 6. Guidance and Further Information

- Seek legal advice if unsure about the appropriateness of any proposed activity.

## 7. Summary Table: Key Do's and Don'ts

Do	Don't
Ensure all activities support charitable purposes	Support or appear to support any political party/candidate
Remain politically neutral in all engagements	Use organizational resources for personal political views
Obtain trustee approval for all campaigns/political activities	Allow political activity to become the sole focus
Keep clear records and evaluate impact	Ignore legal or reputational risks
Train staff and volunteers on this policy	Engage in unapproved political activities

I



## Data Protection Policy for Fitya

### 1. Introduction

Fitya is committed to the highest standards of data protection and privacy, ensuring compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all relevant guidance. This policy sets out our approach, responsibilities, and procedures for safeguarding personal data.

### 2. Scope and Applicability

This policy applies to all Fitya employees, contractors, volunteers, and third-party processors handling personal data, regardless of format or location.

### 3. Definitions

- **Personal Data:** Information relating to an identified or identifiable individual.
- **Data Controller:** Entity determining the purposes and means of processing personal data.
- **Data Processor:** Entity processing data on behalf of the controller.
- **Data Subject:** Individual whose data is processed.
- **Processing:** Any operation on personal data (collection, storage, use, deletion, etc.).

### 4. Legal Framework

- UK GDPR
- Data Protection Act 2018
- ICO guidance and best practices

### 5. Data Protection Principles

Fitya adheres to the following principles:

- **Lawfulness, Fairness, Transparency**
- **Purpose Limitation**
- **Data Minimisation**
- **Accuracy**
- **Storage Limitation**

- **Integrity and Confidentiality**
- **Accountability**

## **6. Governance and Responsibilities**

### **6.1 Data Protection Officer (DPO)**

- Fitya appoints a named DPO/Lead with published contact details.
- Responsibilities include compliance monitoring, advice, DPIAs, training, and acting as the main contact for data subjects and the ICO.

### **6.2 Senior Management**

- Ensures resources, approves policies, oversees privacy by design, and reports to the board.

### **6.3 Staff and Volunteers**

- Complete mandatory GDPR training.
- Follow all data protection procedures.
- Report breaches or concerns immediately.

### **6.4 Third Parties**

- All processors are subject to due diligence and binding contracts, including breach notification and data return/deletion clauses.

## **7. Privacy Statement**

- A comprehensive privacy statement is published on Fitya's website, covering all GDPR-required elements, including:
  - Identity and contact details
  - Purposes and legal bases for processing
  - Categories of data and recipients
  - Retention periods
  - Data subject rights
  - International transfers (if any)

## **8. Data Mapping and Inventory**

- Maintain up-to-date records of processing activities, data flows, categories, and retention periods.

## 9. Legal Basis for Processing

- Identify and document the legal basis for each processing activity (consent, contract, legal obligation, vital interests, public task, legitimate interests).
- Conduct and document Legitimate Interest Assessments (LIAs) where applicable.
- Manage and record consent, ensuring it is freely given, specific, informed, and withdrawable.

## 10. Data Subject Rights

- **Right to Information:** Clear privacy notices at data collection.
- **Right of Access:** Written/verbal requests accepted, ID verified, response within one month.
- **Right to Rectification, Erasure, Restriction, Portability, and Objection:** Procedures in place for each right, with clear escalation and communication.
- **Automated Decision-Making:** Inform data subjects and provide meaningful information about logic and consequences.

## 11. Data Security

### 11.1 Technical Measures

- Encryption (at rest and in transit)
- Access controls and authentication
- Regular security testing and vulnerability assessments
- Secure backup and recovery
- Network security and firewalls

### 11.2 Organisational Measures

- Security policies and procedures
- Physical security
- Incident response plans
- Regular audits and reviews



## **11.3 Access Management**

- Role-based access, least privilege principle

## **11.4 Removable Media and Mobile Devices**

- Encryption, access controls, secure disposal, monitoring

## **12. Data Breach Management**

- Immediate reporting and containment
- Risk assessment for data subjects
- ICO notification within 72 hours if required
- Notification to affected individuals if high risk
- Full documentation and remedial action tracking
- Regular breach response training

## **13. Subject Access Requests (SARs)**

- Accept requests in writing or verbally
- Verify identity
- Respond within one month, providing all required information
- No fee unless request is manifestly unfounded or excessive
- Escalation procedures in place

## **14. Data Retention and Deletion**

- Maintain detailed retention schedules
- Regularly review and securely delete or anonymise data when no longer required

## **15. Data Sharing and International Transfers**

- Share data only when necessary and with appropriate safeguards
- International transfers only with adequacy decisions or standard contractual clauses

## **16. Privacy by Design and Default**

- Embed privacy in all systems and processes

- Conduct Data Protection Impact Assessments (DPIAs) for high-risk processing
- Default to privacy-friendly settings

## **17. Training and Awareness**

- Mandatory induction and annual GDPR training for all staff and volunteers
- Role-specific and refresher training as needed
- Maintain training records and assess competency

## **18. Monitoring, Review, and Compliance**

- Regular audits and compliance reviews
- Maintain records of processing, consent, and compliance measures
- Use KPIs to measure effectiveness
- Annual policy review and version control
- Communicate updates to all stakeholders

## **19. Complaints and Enforcement**

- Clear procedures for handling complaints
- Prompt, fair investigation and remedial action
- Disciplinary action for non-compliance
- Full cooperation with the ICO

## **20. Special Categories and Criminal Data**

- Additional safeguards and legal bases for special category and criminal conviction data
- Explicit consent or other Article 9 bases required

## **21. Specific Processing Activities**

- **Marketing:** Only with appropriate legal basis and opt-out mechanisms
- **Employee Data:** Processed with clear privacy notices and safeguards
- **Customer Data:** Managed per privacy notice and terms of service
- **Supplier/Vendor Data:** Processed with contracts and safeguards

- **Website/Cookies:** Clear information and consent mechanisms

## **22. Policy Approval and Contact Information**

- Approved by senior management: Ahmed Moustafa , Director
- Next review date: 01/07/2026
- Data Protection Officer: Ahmed Ammar
- General Enquiries: [GDPR@Fitya.org.uk](mailto:GDPR@Fitya.org.uk)
- ICO Registration: [Registration Number]



# FITYA Safeguarding Policy – Comprehensive Edition

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**FITYA LTD Safeguarding Policy – v2.1**

Approved by the Board of Trustees on **15 June 2025**

Minute reference **FT-2025-06-03**

Next scheduled review **July 2026** (or sooner if statutory guidance changes)

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## **1-Purpose & Vision**

In accordance with FITYA's safeguarding objectives, this section clarifies responsibilities for staff and volunteers, so that vulnerable children and young people consistently experience safe, empowering environments.

Building on our commitment to child-centred practice, we reinforce the importance of culturally sensitive engagement, so that vulnerable children and young people consistently experience safe, empowering environments.

Recognising the diverse vulnerabilities of our beneficiaries, this paragraph elaborates our approach to proactive risk management, which in turn promotes confidence among stakeholders and regulators.

In accordance with FITYA's safeguarding objectives, this paragraph elaborates our approach to proactive risk management, in line with the principles of fairness, proportionality and respect.

Guided by statutory mandates and sector best practice, we reinforce the importance of culturally sensitive engagement, in line with the principles of fairness, proportionality and respect.

Building on our commitment to child-centred practice, this section clarifies responsibilities for staff and volunteers, in line with the principles of fairness, proportionality and respect.

Guided by statutory mandates and sector best practice, this section clarifies responsibilities for staff and volunteers, ensuring that every concern is escalated swiftly and effectively.

Guided by statutory mandates and sector best practice, we outline monitoring processes designed to sustain accountability, so that vulnerable children and young people consistently experience safe, empowering environments.

In accordance with FITYA's safeguarding objectives, we underscore the necessity of multi-agency collaboration, ensuring that every concern is escalated swiftly and effectively.

In accordance with FITYA's safeguarding objectives, the policy details mechanisms for early identification of harm, ensuring that every concern is escalated swiftly and effectively.

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## **2-Legal & Policy Framework**

In accordance with FITYA's safeguarding objectives, this paragraph elaborates our approach to proactive risk management, thereby embedding a culture of transparency and continuous learning.

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### **3-Definitions**

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#### **4-Principles**

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## 5-Safeguarding Governance

Role	Name	Email	24 / 7 phone
Designated Safeguarding Director	Ahmed Moustafa	<a href="mailto:ahmed.moustafa@fitya.org.uk">ahmed.moustafa@fitya.org.uk</a>	+44 7766663129
Designated Safeguarding Lead (DSL)	Ahmed Ammar	<a href="mailto:ahmed.ammar@fitya.org.uk">ahmed.ammar@fitya.org.uk</a>	+44 738582943

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## **6-Safer Recruitment & Vetting**

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### **7-FITYA Safeguarding Charter (Code of Conduct)**

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## **8-Training & Continual Development**

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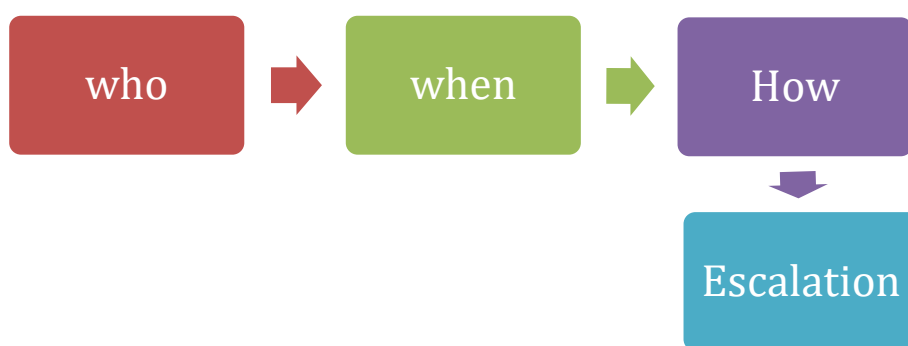
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### 24-hour escalation

- [safeguarding@fitya.org.uk](mailto:safeguarding@fitya.org.uk)
- 07385 821 943
- Out-of-hours backup: 07766 663 129
- If child at immediate risk: 999 (Police), then inform DSL within 2 h.
- External helplines: NSPCC 0808 800 5000 · Childline 0800 1111 · Police non-urgent 101

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## **10-Specialist Risk Areas**

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## **11-Record-keeping & Data Protection**

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In accordance with FITYA's safeguarding objectives, the policy details mechanisms for early identification of harm, in line with the principles of fairness, proportionality and respect.

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Guided by statutory mandates and sector best practice, we outline monitoring processes designed to sustain accountability, so that vulnerable children and young people consistently experience safe, empowering environments.

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To ensure consistent excellence in protection, this section clarifies responsibilities for staff and volunteers, which in turn promotes confidence among stakeholders and regulators.

## **12-Review & Accountability**

Building on our commitment to child-centred practice, we reinforce the importance of culturally sensitive engagement, in line with the principles of fairness, proportionality and respect.

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### **13-Appendix A – Statutory & Regulatory References**

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## **14-Appendix B – Organisational Structure**

Building on our commitment to child-centred practice, this section clarifies responsibilities for staff and volunteers, thereby embedding a culture of transparency and continuous learning.

To ensure consistent excellence in protection, this section clarifies responsibilities for staff and volunteers, ensuring that every concern is escalated swiftly and effectively.

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## **15-Appendix C – Detailed Indicators of Abuse**

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## **16-Appendix D – Reporting Forms & Flowcharts**

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## **17-Appendix E – Glossary of Key Terms**

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## 18- Appendix G – Helplines, templates & evidence bundle

### G-1 External Help & Advice Lines

#### 24-hour escalation

- [safeguarding@fitya.org.uk](mailto:safeguarding@fitya.org.uk)
- 07385 821 943
- Out-of-hours backup: 07766 663 129
- If child at immediate risk: 999 (Police), then inform DSL within 2 h.
- External helplines: NSPCC 0808 800 5000 · Childline 0800 1111 · Police non-urgent 101

### G-2 Safeguarding Evidence Log

*Always update*

- **Training matrix** – the annual training camp for Fitya volunteer must cover the safeguarding training.
- **12-month refresher calendar** – table of planned dates & audiences
- **Update the incident register**

### G-3 Document Templates

- Fitya safeguarding incident report.