

ARMY CENTRAL FUND POLICIES

POLICY 1 – INTRODUCTION, VISION AND MISSION

1.1 Introduction. The Army Central Fund (ACF) is a grant-making charity comprising a Board supported by the Secretary. It awards grants to projects and activities to benefit serving British Army personnel and their immediate families¹.

1.2 Policies. ACF policies are:

| | Policy |
|---|--|
| 1 | Introduction, Vision and Mission |
| 2 | Code of Conduct and Conflicts of Interest Policy |
| 3 | Finance Policy and Risk Policy |
| 4 | Equality, Diversity and Inclusion Policy |
| 5 | Safeguarding Policy, Complaints and Serious Incident Policy |
| 6 | Data Protection Policy, Privacy and Website Terms and Conditions |

Note: A checklist of ACF policies cross-referenced with the Charity Commission Annual Return questions 2020-2025 is at Annex B.

1.3 ACF Vision. A better quality of life for serving British Army personnel and their families.

1.4 ACF Mission. To contribute to an enhanced lived experience for serving British Army personnel and their immediate families, through the award of financial grants.

1.5 History. The ACF was originally formed in 1920 by amalgamating various World War 1 welfare funds. Its purpose was to improve the welfare of serving British Army personnel and their families. It became a registered charity in 1948. Today it achieves its purpose by awarding grants to Army units and to those charities that support the Army. The Charity's regular income is generated from its capital investments with some additional income from donations. It does not receive government funding and does not fundraise or charge subscriptions. Further details of the Charity and guidance on the grant application process is available on the website www.armycentralfund.org.uk.

1.6 Governance. ACF is a UK charity registered with The Charity Commission for England and Wales. Our corporate trustee is The Army Central Fund Trustee Limited, a company limited by guarantee which is registered with Companies House (Company Number 11820705). The Corporate Trustee is responsible for the charity's vision, values, policies and long-term strategy. It manages the funds of the charity and all its activities and has discretion to award grants under the terms of its governing document, its Charity Commission Scheme (at Annex A). Day-to-day management of the Charity is delegated to the Secretary.

1.7 How we work.

- Grants Programme.

¹ The ACF is guided by the definitions used by the Ministry of Defence (MOD). The term 'immediate family' is as defined by the MOD as the serving member of the British Army, their spouse or civil partner and dependent children under the age of 18 (plus additional categories listed in the regulation). For the details see Chapter 2 of Joint Service Publication (JSP) 752 (Tri-Service Regulations for Expenses and Allowances).

- Annual Awards. The ACF awards an annual grant to the Army to provide welfare funds down to regional level. We also fund around half of the core costs of the Army Families Federation and the Army Sport Control Board.
- Projects. Additional funds are available to:
 - Charities. UK registered charities that support the serving Army community may apply for a grant towards projects
 - Army Units and Organisations. Applications for project grants are to be made through the process laid down in Army Command Standing Order 3206 which is available to serving personnel on MODNet/DII
- Eligibility. Currently the ACF does not award grants directly to individuals, we fund other charities and military units to provide support to the serving community that falls under either:
 - Object 1 To promote the efficiency of the Army. This covers community activities and sports facilities and any other approved charitable purpose
 - Object 2 Relief of need, hardship or distress of serving Army personnel and their immediate families
- Assessment. All grant applications are assessed, and the Board has full discretion to decide which are approved and which are not
- Funds. The Board manages the ACF's funds to sustain the grants programme. The Annual Report and Financial Statement details investments, income and expenditure and gives a summary of the Charity's activities that year. Previous reports are available on the Charity Commission for England and Wales website (Charity 245700).

1.8 The Board. The Board holds two main meetings a year with additional meetings as required. The Spring meeting sets the budget and considers applications for grants. The Autumn meeting approves the Annual Report and Financial Statements, the Audit Report, and any additional grant applications.

1.9 Collaboration. We pursue opportunities for collaboration and joint grants where the outcome meets our charitable objectives. We work closely with The Army, the Ministry of Defence and other charities particularly The Nuffield Trust for the Forces of the Crown, ABF The Soldier's Charity, SSAFA The Armed Forces Charity and Royal Navy and Royal Air Force charities.

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Annex:

A. Charity Commission Scheme.

B. Policy Checklist

**Copy of Charity Commission Scheme
with consolidated amendments**

THE CHARITY COMMISSIONERS FOR ENGLAND AND WALES

Under the power given in the Charities Act 1993

Order that from today, the

21 July 2004

the following

SCHEME

will govern the charity

known as

THE ARMY CENTRAL FUND (245700)

Amendment 1 was made by resolution dated 13 May 2014

Amendment 2 was made by resolution dated 6 December 2016

Amendment 3 was made by resolution dated 19 November 2019

1. Definitions

In this scheme:

“the Army” means the Army as defined in Queen’s Regulations for the Army and any other units, formations or establishments administered by the Army Board of the Defence Council.

“the charity” means the charity identified at the beginning of this scheme.

“the trustee” means the trustee of the charity acting under this scheme.

ADMINISTRATION

2. Administration

The charity is to be administered in accordance with this scheme. This scheme replaces the former trusts of the charity.

3. Name of the charity

The name of the charity is The Army Central Fund

OBJECTS

4. Objects of the charity

The objects of the charity are:

- (1) To promote the efficiency of the Army for the public benefit in such charitable ways as the trustee may decide; and
- (2) The relief of persons who:
 - (a) are in need, hardship and distress: and
 - (b) are serving personnel of the Army or the dependants of such persons.
- (3) The trustee may relieve persons in need by:
 - (a) making grants of money to them; or
 - (b) providing or paying for goods, services or facilities for them; or
 - (c) making grants of money to other persons or bodies who provide goods, services or facilities to those in need.

POWERS OF THE TRUSTEE

5. Powers of the trustee

In addition to any other powers which they have, the trustee may exercise the following powers in furtherance of the objects of the charity:

- (1) Power to co-operate with other charities, voluntary bodies and statutory authorities. The trustee may exchange information and advice with them.
- (2) Power to borrow money and to charge the property of the charity as security for any loan. The trustee must comply with the restrictions on mortgaging imposed by the Charities Act 2011.
- (3) Power to raise funds (the trustee must not undertake any permanent trading activities).
- (4) Power to make rules and regulations consistent with this scheme for the management of the charity.

PATRONS OF THE CHARITY

6. Patrons

The patrons of the charity are the members for the time being of The Army Board of the Defence Council.

TRUSTEE

7. The Army Central Fund Trustee Limited (company number 11820705) acting in accordance with its own procedures will be the trustee of the charity.

CHARITY PROPERTY

8. Use of income and capital

- (1) The trustee must first apply:
 - (a) the charity's income; and
 - (b) if the trustee thinks fit, expendable endowment

In meeting the proper costs of administering the charity and of managing its property.

- (2) After payment of these costs, the trustee must apply the remaining income in furthering the object of the charity.
- (3) The trustee may also apply expendable endowment for the object of the charity.

AMENDMENT OF SCHEME

9. Amendment of the scheme

- (1) Subject to the provisions of this clause, the trustee may amend the provisions of this scheme.
- (2) The trustee must not make any amendment which would:
 - (a) vary this clause;
 - (b) vary the definitions clause and clause 4 of this scheme (the object clause).
- (3) The trustee must obtain the prior written approval of the Commissioners before making any amendment which would:
 - (a) vary clause 10 of this scheme (Trustee not to have a personal interest);
 - (b) vary the name of the charity.
- (4) The trustee must:
 - (a) promptly send to the Commissioners a copy of any amendment made under this clause; and
 - (b) keep a copy of any such amendment with this scheme.

GENERAL PROVISIONS

10. Questions relating to the Scheme

The commissioners may decide any question put to them concerning:

- (1) the interpretation of this scheme; or
- (2) the propriety or validity of anything done or intended to be done under it.

ANNEX B TO
ACF POLICY 1

POLICY CHECKLIST

ACF policies are cross-referenced below with the Charity Commission note on Annual Return Questions issued in December 2022.

‘Governance

Q. Which of the following policies and procedures did your charity have in place at the end of the financial period of this return?’

| Annual Return Question | ACF Policy | Y/N | Comment |
|---|------------------------|-----|--|
| a. Internal charity financial controls policy and procedures. | In Internal Procedures | Y | Financial Controls Procedure |
| b. Safeguarding policy and procedures | 5 | Y | |
| c. Financial reserves policy and procedures | 3.4 | Y | |
| d. Complaints policy and procedures | 5.11-5.13 | Y | |
| e. Serious incident reporting policy and procedures | 5.14 | Y | |
| f. (duplicate of c. above) | | | |
| g. Internal risk management policy and procedures | 3.9-3.11 | Y | |
| h. Trustee expenses policy and procedures | In Internal Procedures | Y | Financial Controls Procedure |
| i. Trustee conflict of interest policy and procedures | 2.5-2.9 | Y | |
| j. Investing charity funds policy and procedures | 3.3 | Y | |
| k. Campaigns and political activity policy | - | N | The charity does not engage in campaigning or political activity |
| l. Bullying and harassment policy and procedures | - | N | No requirement. See Policy 5.15 |
| m. Social Media policy and procedure | - | N | The charity is not active on social media and no policy is required. See Policy 5.16 |
| n. Engaging external speakers at charity events | - | N | Not Applicable – no such events are conducted |

ARMY CENTRAL FUND POLICIES

2 – CODE OF CONDUCT AND CONFLICTS OF INTEREST POLICY

2.1 Purpose. This policy is to ensure that the governance and management of the Army Central Fund (ACF) meets the highest ethical standards. It should be read alongside other relevant ACF policies:

- 1 – Introduction, Vision and Mission
- 3 – Finance Policy and Risk Policy
- 4 - Equality, Diversity, and Inclusion Policy

2.2 Governing Document. Our governing document is the Charity Commission (England and Wales) Scheme for the ACF, a copy of which is attached to Policy 1. Detailed management and administrative arrangements for the Charity are laid down in the Articles of Association of the Army Central Fund Trustee Limited.

CODE OF CONDUCT

2.3 Culture and Values. Members of the ACF Board and Secretary ACF are to abide by the following principles²:

- Selflessness – to act in the best interests of the Charity and with empathy to the serving and their families
- Integrity – not to act or make decisions that would result in personal financial or material gain for us individually, our family or friends or make decisions influenced by undue external pressures
- Objectivity – to make decisions impartially and on merit, without discrimination or bias
- Accountability – to take ownership of Board decisions and be prepared to be scrutinised
- Openness – to take decisions in an open and transparent manner and not withhold information from the public or regulators
- Honesty – to be truthful
- Leadership – to actively promote and support these principles and challenge poor behaviour wherever it occurs

2.4 Personal Characteristics and Conduct. While engaged on ACF business, members of the Board and Secretary ACF commit to:

- devoting appropriate time, enthusiasm and effort to the duties and responsibilities of their role
- acting within the governing document of the ACF and abiding by its policies and procedures
- applying sound, objective judgement with a willingness to speak one's mind

² Based on the UK Government's Seven Principles of Public Life (Committee on Standards in Public Life, Lord Nolan 1995)

- applying the principles of good governance
- acting with impartiality and fairness and respecting Board and individual confidences
- ensuring equal opportunities and the promotion of diversity
- maintaining courteous and collaborative working relationships

CONFLICTS OF INTEREST

2.5 As is required by law, the Board will make decisions based only on what will best achieve the aims of the Charity. We will not be influenced by personal interests or external pressures and will seek to avoid:

- Financial Conflicts – where a Board member, employee, or family member could benefit financially from a decision of the Board
- Loyalty Conflicts – where a Board member, employee, or family member might have links to a grant application (e.g., be a trustee of a charity, member of a unit or participant in a sport that is seeking funds).

2.6 Declarations. Trustees will sign a declaration of interests on appointment and this will be amended and re-signed annually. Conflict of Interest will be a standing item at all meetings and attendees will be reminded that they are required to declare any interests that might prevent them being impartial or may create the appearance of impropriety. If the extent of the conflict requires it, the individual will normally be requested to leave the meeting room while that item is being considered.

2.7 Related Parties. The ACF and individual Board members have close working relationships and shared values with many Army organisations including those in receipt of annual grants from the ACF (e.g., Headquarters Regional Command, the Army Sport Control Board and the Army Families Federation). It is important that our decisions are demonstrable independent of these bodies. Where possible, Board members should not be a trustee of one of these bodies, if they are it should be declared as a conflict of interest.

2.8 Recording Decisions. Conflicts of Decisions and the actions taken are to be recorded in the record of meetings in sufficient detail for the issue and outcome to be clear.

2.9 The approved conflict of interest declaration form and detailed advice is available to trustees and employees in the Internal Procedures handbook.

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ARMY CENTRAL FUND POLICIES

3 – FINANCE POLICY AND RISK POLICY

FINANCE POLICY

3.1 Purpose. This policy outlines the ACFs approach to investment and finance. It applies to trustees and Secretary ACF and to any individual working on behalf of the charity. It should be read alongside other relevant ACF policies:

- 1 – Introduction, Vision and Mission
- 2 - Code of Conduct and Conflicts of Interest Policy
- 4 - Equality, Diversity and Inclusion Policy
- 5 - Safeguarding Policy and Complaints and Serious Incidents Policy

3.2 Investment Strategy. Our investment strategy is to achieve real growth in capital over the long-term and to generate enough annual income to maintain the current level of grant-making. Investments are overseen by the Board supported by the Charity's investment advisor, who is also a Director/Trustee.

3.3 Investment Management. The Charity's main capital investment is held in the Armed Forces Charities Growth and Income Fund (AFCG&I), which is a multi-asset Charitable Authorised Investment Fund managed by BlackRock Investment Management (UK) Limited. The primary objective of this fund is to provide a return on investment (net of fees) over a period of five or more consecutive years, generated through an increase to the value of the assets held by the Fund and/or income received from those assets. Smaller investments are also held in the PITCH charity property fund managed by Mayfair Capital Investment Management Limited and in the CCLA COIF Investment Fund. Investment decisions are made by the Board and actions are carried out by the Secretary.

3.4 Reserves Policy. The AFCG&I capital investment constitutes the Charity's main reserve, and the PITCH investment acts as a further strategic reserve. If reserves are significantly above the level required to sustain annual grants and financial markets are considered to be stable, consideration is given to realising funds for additional capital projects.

3.5 Balancing Income and Expenditure. The annual expenditure rate is calculated as a percentage (currently 3% to 4%) of the capital value of the Charity. This maximises charitable activity and achieves the capital growth and income growth to ensure that the charity will support future generations. The long-term strategy is to sustain the value of investments in real terms to benefit of current and future generations of the Army.

3.6 Short-Term Protection. The AFCG&I Fund has its own reserve to the value of at least three quarterly dividend payments. In the event of severe market instability, the deployment of this reserve would protect the charity's income in the short-term and allow time to adjust the budget and to consider using of the charity's strategic reserve.

3.7 Grant-Making. The Charity awards grants in four principal areas:

- Army Unit Welfare. An annual Army Command Grant is awarded by the ACF to the Army Welfare Grants Committee for welfare and sports projects in Army units and sports associations. The committee can award grants of up to £37,500 and submit larger projects to the Charity's Board for consideration. It also delegates funds to a structure of subordinate regional and local committees with lower grant thresholds.
- Army-Wide Organisations
 - Army Sport Control Board (ASCB). The Charity contributes to ASCBs central running costs to enable it to deliver its charter. This includes supporting the development and management of sport and sports facilities in the Army, governing Army Sports Associations, and authorising sports competitions and events.
 - Army Families Federation (AFF). The Charity contributes to AFFs central running costs to enable it to continue representing Army families at government, Army Command, and local levels. It also enables the AFF to communicate with and respond to enquiries from families and to campaign on current issues including housing, healthcare provision, immigration, money and employment.
- Other Charities. Grants to other charities to improve the well-being of serving soldiers and their families and provide support to those in need.
- Army Projects. In addition to smaller projects supported through the Army Command Grant, the Charity awards larger grants to major projects.

3.8 Financial Management. The charity appoints an independent Treasurer to keep accounting records and to prepare the Annual Financial Statement for external independent audit. The Board monitors financial performance throughout the year and keeps internal financial controls under review. Detailed financial controls are contained in the Internal Procedures handbook, the key elements are:

- Purpose. Financial controls are the essential checks to safeguard assets, identify and manage risk, ensure accurate financial reporting, access financial information, minimise the potential for fraud and achieve good value for money
- Responsibility. The Board is responsible for financial controls and delegates detailed work to the Secretary.
- Segregation of Duties. No single individual has sole responsibility for any transaction. All grants and management costs are approved by the Board in advance and recorded in the budget. The independent treasurer monitors all transactions against the budget and reports monthly, the accounts are externally audited monthly.
- Due Diligence. The Secretary conducts due diligence on all grant applicants to verify their identity, governance, financial state, suitability and culture. Successful grant applications are subject to Grant Terms and Conditions and the applicant is required to agree to these and provide a report on the outcome of the project supported.
- Documentation. The Secretary manages all income and expenditure (including grant payments, support costs and trustee expenses) in line with the procedures and processes approved by the Board.

RISK POLICY

3.9 Background. The Army Central Fund is exposed to fewer risks than many charities as it does not fundraise, trade, bid for contracts, receive significant external funding, manage events or activities, work directly with beneficiaries, or employ volunteers or staff (less the Secretary). The Board closely monitors both financial and non-financial risks. The charity's performance is directly linked to its capital value and investment income and, as outlined in the Finance Policy above, every effort is made to sustain the value of the charity so that it can continue to provide grants into the future.

3.10 Risk Audit. The Board conducts a full risk audit every two years and a review in intervening years. The current strategic risks to the Charity are:

- Conflicts of Interest. Due to the multiple roles of some of the serving military directors there are potential conflicts of interest in grant-making decisions. This risk is mitigated by the measures outlined in Policy 2 (Code of Conduct and Conflicts of Interest)
- Reputational damage. As with any grant-making organisation, there is a risk of an adverse incident occurring during an activity or at a facility funded by the charity but managed by another organisation. This risk is mitigated by due diligence and the requirements laid down in Policy 4 (Equality, Diversity and Inclusion) and Policy 5 (Safeguarding and Complaints).
- Volatile Income Stream. The Board is alert to the potential impact of long-term financial market instability on the charity sector as a whole and on those charities that support the Army. A substantial reduction in market returns remains a risk, but the Charity's funds are well diversified and should be able to sustain current grant-making.

3.11 Risk Assessment. The Secretary maintains a risk register which is regularly reviewed by the Board and used to contribute to strategic decisions.

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ARMY CENTRAL FUND POLICIES

4 – EQUALITY, DIVERSITY AND INCLUSION POLICY

4.1 Purpose. This policy is to ensure that the ACF works to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out its activities³. It also explains how discriminatory incidents or concerns are to be handled. It applies to trustees and Secretary ACF and to any individual working on behalf of the charity. It should be read alongside other relevant ACF policies:

- 1 – Introduction, Vision and Mission
- 2 - Code of Conduct and Conflicts of Interest Policy
- 5 - Safeguarding Policy and Complaints and Serious Incidents Policy

4.2 General. The ACF understands the continuing risk that groups or individuals in the Army community could be denied equality on the grounds of their race, gender, marital status, disability, age, social class, sexual orientation and religion or beliefs. We recognise our legal, moral, and social responsibility to ensure equality of treatment and opportunity in all that we do. We are committed to making diversity and inclusion central to our charitable activities. The ACF will take positive steps to:

- Treat all people with dignity and respect
- Promote opportunity and diversity of thought
- Recognise and value the differences and individual contribution that all people make to the Charity. Identify barriers that under-represented groups face in securing support and take steps to remove them.
- Eliminate discrimination in policy, procedures and day-to-day management
- Challenge discrimination
- Have a robust, up-to-date equality policy which is consistently applied to ensure everyone is treated fairly and equitably.
- Always take any discrimination/sexual harassment complaints seriously, respond sensitively and quickly and, if proven, ensure that the action taken is prompt and effect.

4.3 The Board, employees, and those we work with. The ACF will seek to:

- Widen participation in policy and grant-making decisions to make sure it is representative of the whole Army.
- Promote equality of opportunity and diversity on the Board and in employment.
- Recruit board members and staff openly, actively encourage and support under-represented groups in applying and always appoint the best candidate.
- Evaluate and improve its policies and procedures to ensure equality and diversity principles are embedded in process).
- Review board skills/diversity annually and address lack of diversity.

4.4 Grant Making. The ACF will seek to:

- Fund activities and facilities for all eligible people, based on need

³ This statement is based on the Public Sector Equality Duty (PSED). Although not strictly applicable to the Charity, the PSED reflects our approach.

- Make grant decisions that match the aims and purposes of the charity and meet the priorities of the serving Army.
- Ensure activities and facilities provided through our grants are accessible and delivered fairly to all who require them including minorities.

COMPLAINTS

4.5 Complaints or concerns about Equality, Diversity and Inclusion in the Charity will be handled as detailed in Policy 5 (Complaints Policy). See Paragraph 5.11 onwards.

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ARMY CENTRAL FUND POLICIES

5 – SAFEGUARDING POLICY AND COMPLAINTS AND SERIOUS INCIDENTS POLICY

SAFEGUARDING POLICY

5.1 Purpose. This policy is to ensure that the Army Central Fund (ACF) avoids causing harm to children, adults at risk and vulnerable people who encounter the charity. It also explains how safeguarding incidents or concerns and complaints are to be handled. It applies to Board members and Secretary ACF and states the safeguarding requirements for grant applicants. It should be read alongside other relevant ACF policies:

- 1 – Introduction, Vision and Mission
- 2 - Code of Conduct and Conflicts of Interest Policy
- 4 - Equality, Diversity, and Inclusion Policy

5.2 Safeguarding Policy Statement. The ACF is fully committed to protecting children, adults at risk and any other vulnerable person from all forms of abuse, harm, exploitation, and neglect⁴. We seek to ensure that everyone we work with, inside or outside the organisation, is treated with equal dignity and respect regardless of their age, disability, gender, racial heritage, religious belief, sexual orientation or identity⁵. We recognise the additional needs of vulnerable people from minority groups. Our safeguarding policy is designed to minimise risks by preventing incidents and responding quickly to any concerns.

5.3 Outline. The ACF is a small grant-making charity comprising a Board and one employee (Secretary ACF). It provides grant funding to other organisations for projects and activities that provide collective benefit for serving Army personnel and their families.

5.4 How the ACF safeguards people:

- Grants are only awarded to organisations that we know and that we are confident will strive to prevent incidents by identifying and managing safeguarding risks. Due diligence is carried out on all grant applicants. Responsibility for safeguarding (including work with children or adults at risk) rests with the organisation delivering the activity.
- The Board and Secretary are aware of this policy and their individual responsibility to follow it and to observe the requirements of our Code of Conduct.
- The policy is posted on www.armycentralfund.org.uk and grant applicants are made aware of its contents.
- Activities and projects are visited, and post-grant reports are submitted by grant recipients
- Any safeguarding concerns are to be handled by the organisation delivering the activity.

5.5 Grant recipients are to notify Secretary ACF of any safeguarding issues arising from events or activities funded with an ACF grant. Contact is by email at grants@armycentralfund.org.uk.

INTERNAL SAFEGUARDING

5.6 Scope. The ACF has little direct exposure to safeguarding risks:

- It runs no activities or events
- It does not deal directly with individuals and does not conduct casework
- It has no volunteers or staff (except for Secretary ACF)

⁴ As described in the Care Act 2014 (England)

⁵ As described in the Equality Act 2010

- It keeps no medical or personal data or private images (except data required to register Board members) and has limited online presence
- Contact with children or adults at risk is only likely during visits when hosted and accompanied by the organisation managing the project or activity.
- No Board or employee posts require a Disclosure Barring Service (DBS) check, but on appointment all are required to declare that they are eligible to be appointed as a trustee and as a company director.
- Although outside this Charity's role, occasionally veterans or other individuals in crisis contact the charity. These cases are passed straight on to an appropriate charity or authority and a follow-up check is made to confirm that there has been engagement. Any sensitive information that has been shared is deleted.

EXTERNAL SAFEGUARDING

5.7 Context. The ACF's role is to fund other organisations to provide activities or resources to contribute to the well-being of the serving Army community, including children, adults at risk and other vulnerable people. Responsibility for safeguarding of these activities rests entirely with the organisation delivering the activity, not with the ACF. However, as part of its due diligence when awarding grants, the ACF scrutinises applications to verify that the applicant has the culture, people, and policies in place to provide appropriate safeguarding.

5.8 Reducing Safeguarding Risks. To minimise safeguarding risks the ACF applies the following criteria:

- Grants to Military Organisations. The serving Army operates under Ministry of Defence safeguarding policy⁶. The ACF only accepts grant applications from:
 - Army or Joint Units or Headquarters through the process laid down in Army Command Standing Order 3206 (Army Welfare Funds) which requires a named project officer and approval by the Commanding Officer
 - The Army Welfare Service
 - Established sports associations regulated by the Army Sport Control Board
- Grants to charities. Applications are only accepted from registered UK charities that:
 - Have passed the ACF due diligence check
 - Have a proven record of successfully delivering the relevant service
 - Have a strong safeguarding culture and shared values with the ACF and the Army and follow the Charity Commission guidance which is summarised at Annex A
 - Ideally are a member of the Confederation of Service Charities (Cobseo) or another nationally recognised charity body (e.g., National Council for Voluntary Organisations)

5.9 Grant Processes. Applicants are required to sign a copy of ACF Grant Terms and Conditions which includes accepting their responsibility for providing appropriate safeguarding and the reporting of any incidents arising from events funded by the ACF. Additional requirements are specified for activities supporting adults at risk and children.

REPORTING OF SAFEGUARDING CONCERNS

5.10 Raising a concern. Safeguarding incidents and concerns arising from activities funded by the Charity are to be reported to the organisation that delivered the activity. That organisation is

⁶ Joint Service Publication (JSP) 834 Version 5.2 Nov 2021 and related policies

required to notify Secretary ACF (see paragraph 5.5) of any safeguarding incidents and the actions taken to address them. All follow-up and official reporting (including Serious Incidents Reports) remain the responsibility of the organisation delivering the activity in accordance with the law and Charity Commission guidance.

COMPLAINTS POLICY

5.11 We make every effort to meet peoples' expectations, but circumstances may arise when an individual has a concern which they wish to raise. If an individual's safety or wellbeing is at immediate risk call the emergency services.

5.12 In all other circumstances, anyone who wishes to make a complaint about the Army Central Fund is encouraged to contact the charity first informally, rather than immediately raising a formal complaint to the Charity Commission (see www.gov.uk/complain-about-charity for further advice). We exist to help people. We will respond positively to all contacts and will do our best to resolve any issues. By contacting us first we can help to establish the facts and give advice. The following details will be required:

- The complainants name and contact details
- An outline of the issue and what the complainant is asking to be done
- The circumstances of the complaint; when where any action taken, names of others present who were involved
- Note: Complaints related to activities funded (or part-funded) by the Army Central Fund are to be directed to the organisation providing the activity. They are required to respond.

5.13 Complaints Process. Complaints about the Army Central Fund, its Board or its employees are to be submitted to Secretary ACF (grants@armycentralfund.org.uk) who will consult the Chair and normally acknowledge the complaint within 2 days and respond within 14 days of the complaint being received. Progress reports will be made until the issue is closed. Any complaints about Secretary ACF are to be submitted direct to the Chair whose email address will be provided on request.

SERIOUS INCIDENTS POLICY

5.14 Serious incidents will be immediately reported to the Board by the Secretary (for example: risk of injury or harm, discriminatory behaviour, bullying or sexual harassment, breaches of safety , serious data breaches, fraud). Once the Board has been informed, Serious Incidents will be reported to the Charity Commission by the Secretary, in line with current Charity Commission guidance.

OTHER POLICIES

5.15 Whistleblowing, Bullying and Harassment. The charity has only one member of staff, the Secretary, who reports directly to the Board. Whistleblowing, bullying and harassment are included in their contract of employment and no separate policy is required.

5.16 Social Media. The Secretary's conduct is subject to the terms in their contract of employment and charity is not active on social media. No separate policy is required.

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In line with Charity Commission guidance⁷, the ACF requires partner charities (recipients of an ACF grant) to have an open and positive safeguarding culture and policy to ensure all involved feel able to report concerns, confident that they will be heard and responded to.

We expect partner charities to:

- make sure protecting people from harm is central to its culture with a focus on prevention
- follow statutory guidance, good practice guidance and legislation relevant to their charity
- have appropriate policies and procedures in place, which are followed by all trustees, volunteers, and beneficiaries
- set out risks and how they will be managed in a risk register
- have enough resources, including trained staff/volunteers/trustees for safeguarding and check that these people are suitable to act in their roles
- know how to spot and handle concerns in a full and open manner, quickly respond and carry out appropriate investigations
- have a clear system of referring or reporting to relevant agencies as soon as concerns are suspected or identified
- not ignore harm or downplay failure
- report to the ACF any safeguarding incidents that occur during activities funded by an ACF grant

⁷ The text of this Annex is based on an extract from [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/107122/safeguarding_and_protecting_people_for_charities_and_trustees.pdf)

ARMY CENTRAL FUND POLICIES

6 – DATA PROTECTION POLICY, PRIVACY AND WEBSITE TERMS AND CONDITIONS

6.1 Purpose. The ACF data protection policy is designed to protect personal data. It applies to trustees and Secretary ACF and to any individual working on behalf of the charity. The ACF does not handle any official classified Ministry of Defence material. Any commercially sensitive information is managed project by project. This policy should be read alongside other relevant ACF policies:

2 - Code of Conduct and Conflicts of Interest Policy
5 - Safeguarding Policy and Complaints and Serious Incidents Policy

6.2 Personal Data. Personal data is anything that can identify an individual such as name, address, date of birth, email address or IP address. The ACF will protect individual's personal data to meet the following general guidance:

By itself, the name 'John Smith' may not always be personal data because there are many individuals with that name. However, if the name is combined with other information (such as an address, a place of work, or a telephone number) this is often sufficient to clearly identify one individual.

A name and a corporate email address clearly relates to a particular individual and is therefore personal data. However, the content of any email using those details will not automatically be personal data unless it includes information which reveals something about that individual. ico.org.uk/what-is-personal-data

6.3 Outline. The Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) are based on respecting peoples' wishes regarding their personal data and only using their data in ways that they accept. This policy has been kept short to make it as accessible as possible and to cover the practical application of the Data Protection Act to this charity. A summary of our approach is at Annex A. Our Privacy Notice and Website Terms and Conditions are at Annex B. Secretary ACF is the lead for data protection and is the data controller.

6.4 Scope. The ACF's exposure to data protection issues is limited as we do not:

- Work directly with/to the public or process their personal data
- Work directly with individuals in need. Our grants are only awarded to other charities or organisations and not to individuals and personal data is not transferred to us.
- Conduct any marketing or fundraising activities with the public or with private donors (or seek legacies) or maintain a supporters database.
- Pass personal data to/from any charity partners, suppliers or other external organisations, except for data that is required to meet our statutory obligations and for business purposes. When required, personal data of trustees and employees may be shared with our independent treasurer, auditor, IT provider, legal advisor and financial institutions that the charity deals with.
- Hold any Special Category Data (such as an individual's race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life, sexual orientation or criminal convictions).
- Process any casework or case studies that identify individuals.

6.5 Information Commissioner’s Office (ICO). In line with current guidance, the ACF has not registered with the ICO as it does not process personal data to meet the threshold for registration. We do process data that is required to maintain public registers and conduct routine business administration. In our case this is to register Secretary ACF and trustees with the Charity Commission and Companies House and to administer salaries, expenses and business activities. Personal data that is no longer required is deleted. Due to this low-level of data processing we do not maintain a Record of Processing Activities (ROPA).

6.6 Risks.

- Loss of trustees,’ employees,’ applicants’ or business contacts’ personal data. This risk is mitigated by taking appropriate physical and cyber security measures (e.g., hard copy data is kept in locked containers, IT support and appropriate cyber security is provided by an external supplier, access to electronic data is password protected). Personal email addresses, private telephone numbers or home addresses are not used unless specifically agreed.
- Security breach of ACF IT system. Mitigated by outsourcing our IT system design, security, management and support to an external, qualified IT contractor. With only one member of staff the risk of an internal breach is minimised.
- Security breach of ACF website (including images). Mitigated by outsourcing our website design, management, security and support to an external website contractor.
- Direct contact from an individual at risk or crisis who chooses to share personal data. This is a rare occurrence as ACF does not normally support individuals directly, but if it does happen, the individual is redirected to appropriate support. If the circumstances require, any information received is passed on and then deleted.
- Unintended sharing of personal [data](#) with ACF by a partner charity. The sender will be notified, and the data deleted.

6.7 Data Breach

A breach is a failure of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. We will investigate the circumstances of any loss or breach, to identify if any action needs to be taken. Action might include changes in procedures, where there will help to prevent a re-occurrence or other action, in the event of negligence. We will notify the ICO within 72 hours of a breach if it is likely to result in a risk to the rights and freedoms of individuals (e.g., resulting in discrimination, damage to reputation, monetary loss, or loss of confidentiality).

Annexes:

- A. Data Protection Aide Memoire
- B. Privacy Notice and Website Terms and Conditions

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| Issue Date | 1 May 2023 |
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Data Protection Principles

The Data Protection principles applied in the ACF are that personal data:

- Is to be processed lawfully, fairly and in a transparent manner and:
 - o Is only collected when required for legitimate purposes and provided to the charity by individuals, where possible, with their consent.
 - o We will be open and honest about how and why we collect personal data and will give individuals access to their data if they request and respect individual rights.

- Is collected for specified, explicit and legitimate purposes and not used for any other purpose and:
 - o We are clear what data we will collect and the purpose for which it will be used.
 - o We will only collect data that we need.
 - o We will ensure it data held is accurate, kept up to date and that any errors are corrected.

- Is kept for no longer than is necessary. We assess what data we need to retain, for how long and why.

- Is processed securely to protect against unlawful use, loss or damage.
 - o Paper documents are locked away, access to online folders in shared drives is restricted to those who need it, IT systems are password protected, and/or sensitive documents that may be shared (e.g., payroll) are password protected.
 - o Data is kept safe. Our IT systems have adequate anti-virus and firewall protection that is up to date. Staff understand what they must and must not do to safeguard against cyber-attack, and that passwords must be strong and not written down or shared.
 - o Data is recoverable. We have adequate data back-up and disaster recovery processes.

Army Central Fund Privacy Notice and Website Terms and Conditions

This privacy notice explains what personal data is collected by the Army Central Fund and how we use and protect personal information about the people who visit our websites and give us their data over the phone, face-to-face, and in writing.

The Army Central Fund is the data controller and is responsible for your personal data. Data controllers are legally responsible for ensuring that personal data they obtain is processed in full compliance with the Data Protection Act 2018, which supplements the UK General Data Protection Regulation (GDPR).

By using www.armycentralfund.com website and/or giving personal data to us, you indicate that you consent to us using your personal data in accordance with this Privacy Notice.

The Data We Collect About You

Personal data is any information that relates to a living individual who can be identified from that data. If you contact the charity we may collect your name, work address, work telephone number or work email address. We are unlikely to seek any other personal data and would only receive it if you chose to send it to us.

If you apply for a grant, we may collect personal data about you and other people connected to your organisation through questions on application forms to enable us to contact you at work and administer any grants awarded. Although we do not seek it, sometimes grant applicants and beneficiaries send us personal data about individuals who benefit from projects funded by our grants. We normally delete this data. You are responsible for confirming that you have the written agreement and permission of any individuals identified in your application to pass on their personal information to the Army Central Fund.

We will keep your personal data up to date and store it securely. We will put measures in place to protect it from loss, misuse, unauthorised access and disclosure. We will not collect or retain excessive amounts of personal data and when we no longer need your personal data (or have held it for the maximum time allowed by data protection laws) we will destroy it.

Why We Need Your Information

If a grant is awarded, we may use your personal data to manage and monitor the grant and to check the money is being used appropriately in order to comply with our legal and fiduciary duties. If you do not provide this personal data, we may not be able to process your application or award a grant to your organisation. We will keep in contact with you throughout the duration of your grant and this forms part of the agreement that you make with us when you apply for funding.

We may retain your personal data to help evaluate and research the impact of our grants and to let you know about our grants and other activities. The results of our evaluations and research may be published but we will not publish your personal data without your agreement.

Sharing your personal data

We may share grant details and the name of recipient charities with third parties which help us to carry out our grant making activities. For example, we may share data with organisations which help

evaluate the impact of our grants on communities or with other charities that jointly fund projects with us. However, this does not normally involve sharing personal data from which anyone could be identified. Organisations which support our IT software and systems may also have access to grant data, but any personal data held is encrypted and password protected.

We may also enable law enforcement agencies, regulators, Government, and other funders to access and use your personal data to detect, investigate and prevent crime.

We are a registered charity, not a public body, and make grants from charitable (non-public) funds. However, The Army Central Fund follows the principles of the Freedom of Information Act, and if a member of public asks for information regarding how grants are spent, we may publish or share details of your grant with them. We would not share personal data in these circumstances.

Your rights regarding your personal data

Your personal data is protected by legal rights. These include the right in certain circumstances to

- request a copy of your personal data held by the charity;
- ask us to rectify information you think is inaccurate or to complete information you think is incomplete;
- ask for your personal data to be erased, for example, if we no longer need it for the purpose that we collected it;
- request that we suspend the processing of your personal data, for example if you want us to establish whether it is accurate or the reason for processing it;
- object to the processing of your personal data where we are processing it in the exercise of our duties.

If our processing of your personal data relies on your consent, you also have the right to withdraw your consent at any time and the right to ask for your personal data to be transferred to another organisation (known as the right to data portability). If you would like to exercise any of the rights listed above, or any other rights over your data under current legislation, please contact us.

Notwithstanding the above, we may withhold personal information that you request to the extent permitted by law. As we do not expect to retain any personal data, we have not registered with the ICO, but we comply with the principles of the Data Protection Act 2018 and the UK GDPR and only process data required to carry out our role.

Contact Details

If you have any questions, queries or complaints, and to exercise your personal data rights, please contact us.

Reporting Concerns

If you believe that we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office which regulates the processing of personal data. You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Changes to this Privacy Notice

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We will ensure our website has our most up to date notice and suggest that you check this page periodically to review our latest version.

Website Terms and Conditions

www.armycentralfund.org is a website operated by The Army Central Fund.

We are a UK charity registered with The Charity Commission for England and Wales (Charity Number 245700). Our corporate trustee is The Army Central Fund Trustee Limited, a company limited by guarantee which is registered with Companies House (Company Number 11820705).

These terms and conditions govern your use of our website; by using our website, you accept these terms and conditions in full. If you disagree with any part of these terms and conditions, please do not use our website. Unless otherwise stated, we own the intellectual property rights in the website and material on the website, all these intellectual property rights are reserved.

We reserve the right to suspend or permanently block your access to our website or any portion of it without further notice.

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- Sell, rent or otherwise sub-license material on the website.
- Reproduce, duplicate, copy or otherwise exploit material on our website for a commercial purpose.

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External Sites

The Army Central Fund takes no responsibility for the content of external sites.