

Accountability & Transparency Policy

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Purpose

The purpose of this policy is to outline the Charity's approach to Accountability and Transparency and set out key principles.

Approach

The Directors / Trustees of the Charity take their duties and responsibilities seriously and will comply with company law, charity law and best practice applicable to its activities and organisation.

The Charity's articles of association, together with any rules and regulations made by the Directors / Trustees from time to time, including this Accountability and Transparency policy, provide the framework within which the Directors / Trustees operate.

The Directors / Trustees will monitor and review this Accountability and Transparency policy on an ongoing basis.

Key Principles

As company directors, they have duties and responsibilities under company law and, as charity trustees, they have duties and responsibilities under charity law.

The Rec is held by the Charity on permanent endowment trusts, separate to the Charity's other assets. The Charity is therefore the sole corporate trustee of the Bath Recreation Ground Trust (the Trust) (which is a registered charity linked with the Charity for registration and accounting purposes). The governing document of the Trust is a Charity Commission Scheme dated 3 November 2017.

The Directors / Trustees of the Charity recognise their duties and the importance in respect of their accountability and the need for transparency to the Charity and its stakeholders. The following key documents form the background and basis for the Charity and the Charity's operations:

- Articles of association governing the Charity (including any rules, regulations or policies made under the articles from time to time);
- The Charity Commission Scheme dated 3 November 2017;
- The linking direction dated 3 November 2017 (linking the Charity and Trust for registration and accounting purposes) and
- Guidance issued by the Charity Commission from time to time.

The Directors / Trustees recognise that accountability and transparency facilitate good relationships with beneficiaries and other stakeholders. The Charity holds an Annual Meeting (which is required under the articles of association) for the benefit of the public who use (or may use) the facilities provided by the Charity. The Annual Meeting allows the Directors / Trustees to consult with beneficiaries and stakeholders in relation to the activities of the Charity.

Accountability & Transparency Policy

The Directors / Trustees will act openly and transparently to promote participation and accountability. However, it is acknowledged by the Directors / Trustees that placing some information in the public domain may not, in the judgment of the Directors / Trustees, necessarily promote transparency and could have an adverse effect on the affairs of the Charity and the Trust in certain circumstances (e.g. where the Directors / Trustees are considering issues which are commercially confidential).

Subject to this proviso and to the exercise of the Directors' / Trustees' discretion, information to be made public will be provided in a timely and accurate manner. The Charity's website will be the main avenue for routine publicity and information provision whilst the Annual Meeting and Directors' / Trustees' annual report and accounts will provide the formal accountability process.

Conflicts of Interest

The Directors / Trustees understand that they have a legal duty to act only in the best interests of the Charity. When the Charity is acting (via the Directors / Trustees) in its capacity as corporate trustee of the Trust, the Directors / Trustees must act in the best interests of the Trust.

The Directors / Trustees recognise that conflicts of interest could arise where their personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of the Charity (or the Trust as the case may be).

The Charity's articles of association contain a framework for the declaration and management of conflicts of interest. The Charity also maintains a separate Conflicts of Interest policy.


The Directors / Trustees will also review and take into consideration Charity Commission guidance on conflicts of interest (publication CC29 *Conflicts of interest: a guide for charity trustees*).

Complaints Handling

The Directors / Trustees believe it is important to provide a fair and accessible complaints procedure which is clear and easy to use and to ensure that complaints are, wherever possible, resolved and relationships repaired. A complaint is an expression of dissatisfaction, whether justified or not, and will be given due consideration by the Charity.

Complaints should in the first instance be directed to one of the Charity's staff members in writing, by telephone or face to face. The staff member will listen to the complaint and try to resolve the issue. Directors / Trustees will be notified of complaints at the time if this is deemed necessary by the Chief Executive of the Charity but all complaints and correspondence from users of The Rec or other members of the public will be reported to the Board at their regular meetings. In light of complaints made to the Charity, the Directors / Trustees will consider whether there are any lessons to be learnt for the future.

All complaint information will be handled sensitively, confidentially and following any relevant data protection requirements.



Chair

Bath Recreation Limited

Date Reviewed: July 2020

Board Structure, Responsibilities and Risk Management Policy

Bath ● ● ●
Recreation

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Purpose

The purpose of this policy is to outline the Charity's Board Structure and set out key responsibilities.

Approach

The Directors / Trustees of the Charity take their duties and responsibilities seriously and will comply with company law, charity law and best practice applicable to its activities and organisation. The Directors / Trustees will also review and consider guidance issued by the Charity Commission from time to time.

The Trustees will monitor and review this Board Structure and Responsibilities policy on an ongoing basis.

Key Principles

As company directors, they have duties and responsibilities under company law and, as charity trustees, they have duties and responsibilities under charity law.

The Rec is held by the Charity on permanent endowment trusts, separate to the Charity's other assets. The Charity is therefore the sole corporate trustee of the Bath Recreation Ground Trust (the Trust) (which is a registered charity linked with the Charity for registration and accounting purposes). The governing document of the Trust is a Charity Commission Scheme dated 3 November 2017.

The Charity's articles of association form the basis of the Charity's Board structure, responsibilities and decision-making processes.

Directors / Trustees recognise and will work within the articles of association and Accountability and Transparency Policy to ensure that all activities and actions are undertaken openly and transparently to achieve the best outcome for the Charity and in line with the Charity's objectives and relevant legal and regulatory restrictions.

When taking decisions in relation to the Rec, the Charity, acting in its capacity as trustee of the Trust, will follow its usual administrative processes, always taking into consideration the powers available to the Charity (as trustee of the Trust) under the Scheme.

The Directors / Trustees will also take into consideration the best practice guidance issued by the Charity Commission in relation to decision making, and in particular the principles of trustee decision making outlined in that guidance (publication CC27 *It's your decision: charity trustees and decision making*).

Article 12 of the Charity's articles of association allow the Directors / Trustees to delegate any of their powers to any person (including employees of the Charity) or committee (consisting of two or more Directors / Trustees) in support of operational activities and to progress strategic activities. Any decisions which have not been delegated or expenditure will be referred to the full Board of Directors / Trustees. The full Board will be kept updated of any acts carried out or decisions taken by the individual or committee to which the Board has delegated certain

Board Structure, Responsibilities and Risk Management Policy

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activities. The Board will be ultimately responsible and accountable for any actions or decisions taken by such individuals or committees.

Key strategic items within the Charity's Operation Plan will have an appointed Lead Trustee to provide advice and guidance within their knowledge sphere.

Directors / Trustees are aware of their responsibilities to the Charity's (and the Trust's) beneficiaries and stakeholders to ensure that the best outcomes and operating practices are achieved for the Charity (and the Trust).

Risk Management

The Charity maintains a Risk Register which is reported on and reviewed at quarterly Board meetings. The Chief Executive and Chair monitor and assess risks to the Charity in their routine meetings and report any major or sudden risks to the Board as and when appropriate.



Chair

Bath Recreation Limited

Date Reviewed: July 2020

Conflicts of Interest Policy

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Purpose and scope

This document sets out principles for managing potential and actual conflicts of interest or duty affecting the Directors / Trustees of Bath Recreation Limited (**Charity**). It applies to all Directors / Trustees. Its purpose is to enable the Directors / Trustees to ensure the open and proper management of any particular conflict.

Background

Directors / Trustees have a legal obligation to act in the best interests of the Charity and in accordance with its articles of association, its policies and the laws that apply to it. They are expected to act impartially and objectively, and to take steps to avoid conflicts of interest or duty.

Conflicts inhibit free discussion, may result in decisions that are not in the best interests of the Charity and risk giving the impression that the Directors / Trustees have acted improperly.

Conflicts can come in all shapes and sizes. The Directors / Trustees should be alive to this, and each Director / Trustee has a responsibility to identify where there may be a conflict in relation to themselves or a person connected to them.

Legal context

There are some fundamental legal issues Directors / Trustees should ensure they understand. These are summarised below.

Director / Trustee benefits

Directors / Trustees cannot receive any personal benefit from the Charity unless they have express legal authority to do so. "Benefit" includes any property, goods or services which may have a monetary value, as well as money. This will include payments to a Director / Trustee for providing goods or services to the Charity on normal commercial terms. A Director / Trustee who may derive any personal benefit of this kind from a transaction with the Charity will have a conflict between their duty to the Charity and their own personal interest in the benefit. It is the potential benefit (rather than any actual benefit) which gives rise to this conflict of interest.

General Director / Trustee benefits

Directors / Trustees are expressly authorised to receive the following "general" benefits (i.e. benefits that are available to all Directors / Trustees):

- indemnity insurance paid for by the Charity
- reasonable expenses properly incurred by the Director / Trustee in acting as a Director / Trustee and paid or reimbursed by the Charity
- indemnity payments from the Charity under its articles of association
- payments to any company in which a Director / Trustee owns no more than 2% of the shares

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- other payments or benefits permitted by charity law or with the prior consent of the Charity Commission.

Specific Director / Trustee benefits

In addition, Directors / Trustees may also receive the following "specific" benefits (i.e. benefits made available to individual Directors / Trustees in accordance with an authority under the Charity's articles:

- interest on money lent to the Charity by a Director / Trustee at a reasonable rate
- rent on property leased to the Charity by a Director / Trustee at a reasonable rate
- payments made to any Director / Trustee in their capacity as a beneficiary of the Charity
- reasonable and proper remuneration to any Director / Trustee for goods or services supplied to any subsidiary company of the Charity, provided that no more than half of the Directors / Trustees receive remuneration in any financial year.

Where a conflict is authorised, the Director / Trustee will not be in breach of his or her duty to avoid it, but the conflict must be appropriately managed (see paragraph 0 below).

Conflicts of duty

A Director / Trustee who owes a duty to another person who is involved in a transaction with the Charity will have a conflict between their duty to the Charity and their duty to the other person (which may be because they are a trustee, director, shareholder, member, officer or employee of that other person). Notwithstanding that the Director / Trustee has no personal interest in the transaction, and cannot benefit from it personally, he or she will have a conflict of duty. Conflicts of duty should also be appropriately managed by the Directors / Trustees.

Duty to avoid conflicts

Every Director / Trustee owes a duty to avoid any conflict of interest or duty. The duty is not simply to mitigate any conflicts that arise, but to avoid them altogether. In this context the duty does not simply relate to actual conflicts of interest or duty, but rather a Director / Trustee must avoid a situation where he has, or may have, a direct or indirect interest or duty that conflicts, or possibly may conflict, with the Charity's interests.

The duty to avoid conflicts arising in relation to any situation, matter, transaction or arrangement between the Charity and the Bath Recreation Ground Trust (**Trust**) has been dis-applied under the Charity's articles of association.

Connected persons

A Director / Trustee can be put in a position of conflict where the Charity enters into a transaction or arrangement with a member of their family or a business in which they are a shareholder or partner or anyone else who is "connected" to them.

Any benefit to the connected person is a benefit to the Director / Trustee. For this purpose a "connected" person is:

- a spouse or civil partner of a Director / Trustee;
- a parent, child, brother, sister, grandparent or grandchild of a Director / Trustee and who is financially dependent on the Director / Trustee or on whom the Director / Trustee is financially dependent (or any spouse or civil partner of any of these people);

Conflicts of Interest Policy

- any other person in a relationship with a Director / Trustee which may reasonably be regarded as equivalent to that of a spouse or civil partner; or
- any company, LLP or partnership of which a Director / Trustee is a paid director, member, partner or employee or a holder of more than 2% of the share capital or capital.

Declaration of interests

On their appointment, and at least once each year, Directors / Trustees must declare their interests and any gifts or hospitality accepted in connection with their role as a Director / Trustee on the declaration of interests form attached to this policy. The form lists various types of interest which should be declared by Directors / Trustees (if relevant).

The Charity's Office Manager will use the information provided by Directors / Trustees to maintain a register of interests for all Directors / Trustees. The register will be accessible to all Directors / Trustees.

Directors / Trustees should amend their declarations of interest as soon as possible following any change in their circumstances and will, in any event, be invited to update their entries at the first Directors / Trustees' meeting in each calendar year.

Although the Charity's staff are not under the same legal duties as the Directors / Trustees to avoid and declare their interests, it is the Charity's policy that its staff should also declare their interests. Staff should use the same declaration of interests form provided for Directors / Trustees.

In addition to completing and updating the declaration of interests, every Director / Trustee must declare to the other Directors / Trustees and the Charity's Office Manager the nature and extent of any direct or indirect interest he or she may have in any existing transaction or arrangement with the Charity or any transaction or arrangement proposed with the Charity of which the Director / Trustee is aware.

A Director / Trustee's declaration must be made to the other Directors / Trustees: at a Directors / Trustees' meeting at which the transaction or arrangement is to be discussed; or by written notice sent by post or email to the other Directors / Trustees using the form of notice attached to this policy.

If a Director / Trustee fails to declare an interest which is known to the Chair of the meeting, then the Chair will declare that Director's / Trustee's interest to the meeting. The Director / Trustee must give notice to the other Directors / Trustees before any proposed transaction or arrangement is entered into or, in any other case, as soon as reasonably practicable. The declaration of any interest will be an agenda item for every board and committee meeting.

Where a Director / Trustee has an interest, whether as a shareholder, member, director, employee or otherwise in another entity or person (including any subsidiary company of the Charity), he or she may give the other Directors / Trustees (and the Charity's Office Manager) a notice stating the nature and extent of the interest in question. This will constitute a declaration of interest in any transaction or arrangement with that entity or person. Directors / Trustees should use the form of notice attached to this policy.

If Directors / Trustees are unsure of what to declare, or whether/when their declaration needs to be updated, they should contact the Chair of Directors / Trustees for guidance.

Conflicts of Interest Policy

Managing conflicts

This policy is not intended to inhibit the normal course of Charity's business. While recognising that identifying and managing conflicts is very important, the Directors / Trustees wish to deal with them in a way which recognises the materiality of the risk that a particular conflict may pose to the best interests of the Charity. The key points are set out below.

General Director / Trustee benefits

Any Director / Trustee who has a conflict of interest which arises exclusively out of any of the general director / trustee benefits described in paragraph 3.3 above, may vote, and count in the quorum on any vote, in relation to that benefit. Because these are benefits generally available to all Directors / Trustees, each Director / Trustee should be able to vote on them.

Specific trustee benefits (and other conflicts of interest)

If a Director / Trustee has an interest in relation to a particular transaction or arrangement (including any of the specific director / trustee benefits referred to in paragraph 3.3 above), the other Directors / Trustees (**Unconflicted Directors / Trustees**) must determine whether the Director's / Trustee's interest can or cannot be reasonably regarded as giving rise to a conflict of interest. During this process, the conflicted Director / Trustee should withdraw from the meeting (and is not to be counted in the quorum or vote).

Subject to paragraph 0 below, if the Director's / Trustee's interest gives rise (or could reasonably give rise to) a conflict of interest in respect of the Charity, he or she must withdraw from the meeting, not be counted in the quorum, vote on the matter or sign a written resolution (unless required to do so to confirm a resolution of the Unconflicted Directors / Trustees). The Unconflicted Directors / Trustees can also decide to exclude the Director / Trustee from receiving information in relation to the matter giving rise to a conflict of interests.

However, if a majority of the Unconflicted Directors / Trustees decide that it would be in the best interests of the Charity for the Director / Trustee to participate in the decision-making process, that Director / Trustee may remain in the meeting, count in the quorum and vote on the matter.

Conflicts of duty

Where a Director / Trustee has a conflict of duty in relation to a particular transaction or arrangement and in which the Director Trustee has no personal interest, the Unconflicted Directors / Trustees can authorise it, so that the Director Trustee in question is not in breach of their duty to avoid it. But the Unconflicted Directors / Trustees must decide what action should be taken to manage the conflict appropriately. In making that decision the Unconflicted Directors / Trustees must act in what they consider to be the best interests of the Charity and should consider whether the nature and extent of the Director's / Trustee's interest and whether it is reasonably likely to give rise to a conflict. The Director Trustee with the conflict of duty should not take part in this decision-making process.

Depending on their assessment of the position, the Unconflicted Directors / Trustees may decide that:

- the Director / Trustee should cease to act in relation to the transaction or arrangement and not vote on it (or count in the quorum in relation to any such vote); or
- the interest should be kept under review, with the Director / Trustee continuing to act in relation to the transaction or arrangement in which the interest arises (including voting on it and counting in the quorum) in the meantime.

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Where a Director / Trustee with a conflict of duty ceases to act in relation to a particular transaction or arrangement, he or she should ordinarily absent themselves from any discussion or vote by the Directors / Trustees on the transaction or arrangement, unless expressly invited to remain to provide information.

Minutes

The minutes of the Directors / Trustees' meeting will record the nature and extent of the conflict and summarise the discussion and the actions taken to manage the conflict.

The Trust

The Charity is the sole corporate trustee of the Trust. When taking decisions in relation to the Trust, the Charity will act via the Trustees.

Directors / Trustees should remember that the Trust is separate to the Charity and therefore, when considering matters relating to the Trust, the Directors / Trustees must ensure that they act in the best interests of the Trust only. In practice, the Directors / Trustees consider that, in general, the interests of the Charity and the Trust are aligned.

Data protection

The information provided will be processed in accordance with all data protection and privacy laws, including the General Data Protection Regulation (GDPR) and any successor legislation. Data will be processed only to ensure that Directors / Trustees act in the best interests of the Charity and that, except as required by law (including in respect of law enforcement or regulatory investigations), no other use will be made of the information provided by Directors / Trustees.

The information provided will not be used for any purpose other than those set out in the declarations or notices themselves.

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Chair

Bath Recreation Limited

Date Reviewed: July 2020

Employment Policy

Bath ● ● ●
Recreation

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Purpose

The purpose of this policy is to outline the Charity's approach to Employment and set out key principles.

Approach

The Charity takes its responsibilities seriously and will comply with statutory and charity legislation and best practice applicable to its activities and organisation. The Directors / Trustees will monitor and review the employment policy on an ongoing basis with the Chief Executive of the Charity. The Chief Executive will report routine operational matters to the regular Board meetings and refer urgent matters directly to the Chair of the Board.

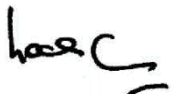
Key Principles

The Employee Handbook sets out important information relating to employment of staff with the Charity.

This Employee Handbook is divided into three parts: Terms and conditions of employment, Contractual policies and procedures. And Non-contractual policies and procedures.

Together with the Offer of Employment Parts 1 and 2 of the Employee Handbook form the Contract of Employment with the Charity. Part 3 sets out some Charity policies, guidelines and important provisions relating to employment, which will be read by all staff on commencement of their contracts.

This Employee Handbook draws together information on Charity policies and procedures about key aspects of employment and it covers many of the more general topics about which employees often ask questions. It illustrates the Charity's intention to treat all employees fairly and consistently and it is intended to be a codification of good employment relations practice in accordance with the law.



Chair

Bath Recreation Limited

Date Reviewed: July 2020

Health & Safety Policy

Bath ● ● ●
Recreation

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Purpose

The purpose of this policy is to outline the Charity's approach to Health and Safety and set out key principles.

Approach

Bath Recreation Limited recognises that it has responsibilities for the health and safety of our workforce whilst at work and others who could be affected by our work activities. We will assess the hazards and risks faced by our workforce in the course of their work and take action to control those risks to an acceptable, tolerable level.

Our managers and supervisors are made aware of their responsibilities and required to take all reasonable precautions to ensure the safety, health and welfare of our workforce and anyone else likely to be affected by the operations of our business.

This business intends meeting its legal obligations by providing and maintaining a safe and healthy working environment so far as is reasonably practicable. This will be achieved by:

- providing leadership and adequate control of identified health and safety risks;
- consulting with our employees on matters affecting their health and safety;
- providing and maintaining safe plant and equipment;
- ensuring the safe handling and use of substances;
- providing information, instruction, training where necessary for our workforce, taking account of any who do not have English as a first language;
- ensuring that all workers are competent to do their work, and giving them appropriate training;
- preventing accidents and cases of work-related ill health;
- actively managing and supervising health and safety at work;
- having access to competent advice;
- aiming for continuous improvement in our health and safety performance and management through regular (at least annual) review and revision of this policy; and
- the provision of the resource required to make this policy and our health and safety arrangements effective.

We also recognise our duty to co-operate and work with other employers when we work at premises or sites under their control to ensure the continued health and safety of all those at work; and our duty to co-operate and work with other employers and their workers, when their workers come onto our premises or sites to do work for us, to ensure the health and safety of everyone at work.

To help achieve our objectives and ensure our employees recognised their duties under health and safety legislation whilst at work, we will also remind them of their duty to take reasonable care of themselves and for others who might be affected by their activities. These duties are explained on first employment at induction and also set out in an Employee Safety Handbook, given to each employee, which sets out their duties and includes our specific health and safety rules.

Health & Safety Policy



In support of this policy a responsibility chart and more detailed arrangements have been prepared.

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Chair

Bath Recreation Limited

Date Reviewed: July 2020

Procurement and Banking Policy

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Purpose

The purpose of this policy is to outline the Charity's approach to Procurement and Banking and set out key principles.

Approach

The Directors / Trustees of the Charity take their duties and responsibilities seriously and will comply with company law, charity law and best practice applicable to its activities and organisation.

The Charity's Chief Executive will report routine operational matters to the Directors / Trustees at each Board meeting and refer urgent matters directly to the Chair of the Board and the Director / Trustee with delegated responsibility for the Charity's financial portfolio.

The Directors / Trustees will monitor and review the procurement policy on an ongoing basis with the Chief Executive.

Key Principles

The Directors / Trustees understand their legal duty to safeguard the Charity's assets and the need to ensure there are appropriate internal financial checks and procedures in place. This includes identifying and managing areas of risk, ensuring there are robust reporting lines in place and maintaining accurate records.

Procurement

Procurement includes any activity where the Charity commits financial cost to acquire equipment or services. In most cases any procurement will follow a Board approved operational budget where future expenditure will be set out.

The Chief Executive is authorised to make payments for goods and services set out in respective approved budgets. The Chief Executive also has authority to enter in to contracts of not more than one year's duration, for items included in the budget and not exceeding £10000 in value. Delegated powers of financial authority for non-budgeted expenditure are as follows:

- Over £10,000, to be approved in advance by the Board
- The Chief Executive has authority up to £10,000 subject to conditions set out in the post's terms of reference.

Banking

The Charity will maintain current and deposit accounts with a UK clearing bank (currently HSBC). There is also an investment account (currently Investec). The Charity will wherever possible use electronic banking for transactions (subject always to the controls outlined below).

Procurement and Banking Policy

The current account will be accessible electronically by a minimum of 2 Directors / Trustees and the Chief Executive (collectively authorised signatories). The current account balance will be maintained between £10,000 and £50,000. Any amount in excess of £50,000 will be transferred by Directors / Trustees to the deposit account as soon as possible after the Chief Executive has confirmed to the Directors / Trustees that the balance has exceeded £50,000. Only Directors / Trustees will have authority to access the deposit account and may further transfer surplus funds to the investment account.

Payments up to £5,000 may be made from the current account and can be set up by an authorised signatory acting alone, including direct debits and Standing Orders, however all transactions are directly monitored by the lead financial Director / Trustee on a routine basis. Payments over £5,000 require the involvement of 2 of the authorised signatories. Cheques are required to be signed by 2 authorised signatories.

The Directors / Trustees will provide the Chief Executive with a debit card. The Chief Executive may only use the debit card for transactions up to the value of £5000. Receipts for all debit card transactions shall be retained and recorded.

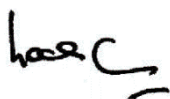
The Directors / Trustees are satisfied that these controls are adequate and appropriate to safeguard charity funds deposited with the Charity's bankers.

Financial checks and controls

The Charity will operate a routine process of financial checks and controls; these include:

- Payments from the current account to be made only in respect of duly authorised invoices/costs as set out above.
- The current account will be reconciled monthly by the office manager who will report any differences to the Chief Executive and the lead Director / Trustee with responsibility for financial matters or the Chair.
- The actual income and expenditure will be reported against budgets at quarterly Board meetings.

The Directors / Trustees will also review and take into consideration the Charity Commission's guidance to charity trustee on internal financial controls (publication CC8 *Internal financial controls for charities*).



Chair

Bath Recreation Limited

Date Reviewed: July 2020

Reserves and Investment Policy

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Key Principles

It is the policy of the Directors/Trustees that the Charity should hold unrestricted reserves to enable it to meet its ongoing commitments and provide sufficient resources to enable it to fund any additional opportunities for the Charity's objectives to be furthered as they may arise.

The investment policy is for a medium to long term investment time horizon with a balanced investment objective.

The Charity is working towards building a reserve which will allow it to remain financially secure when the 1995 lease to Bath Rugby comes to an end and the Leisure Centre is demolished when time expired.

Reserves

The Charity's reserves policy is to ensure continued financial security, provide future growth, maintain an operational reserve and to provide for contingencies (such as a catastrophic flood at the Rec). A portion of these reserves has been identified as long-term cash reserves with the remainder being held as an operational reserve as short-term cash reserves.

Investments

The Chief Executive supported by the Directors/Trustees will use their skills and knowledge to consider the suitability and appropriateness of the investment type and take appropriate advice from and use the services of an authorised professional regulated by the Financial Conduct Authority.

The Directors/Trustees will also review and take into consideration the Charity Commission's guidance on investment matters (publication CC14 *Charities and investment matters: a guide for trustees*).

Appointment of Investment Manager

The Charity will appoint a professional investment management firm to manage the non-property assets in line with this investment policy. The Investment Manager must act within the Charity's best interests and ensure appropriateness of any investment made.

Appointment and ongoing monitoring will include consideration of:

- Effective performance in line with the Charity's objectives and policies
- Investment approach, level of service and a comparison of costs, including any management fees, commission, administration charges, performance fees, bank interest deductions, custody fees and third-party fees
- Reputation and track record
- Experience of managing the investments of charities
- Investment and risk review process
- Reporting arrangements
- Flexibility
- Handling of ethical requirements and potential conflicts.

Reserves and Investment Policy

Investment Objectives

The Charity seeks to produce the best financial return within an acceptable level of risk.

The aim of long-term cash reserves is to maximise return, preserve the Charity's legacy and provide future Directors / Trustees with capital to fund future investment in tangible assets.

The short-term cash reserves requirement is to preserve the capital with a minimum level of risk with assets readily available to meet unanticipated cash flow requirements.

Direct investments in any single company requires approval by a majority of the Managing Group (Chair, Director with delegated financial responsibilities and the Chief Executive)

Risk

Risk should be based on a five-year view on capital invested.

The permanent endowment assets held by the Charity as trustee of the Trust must not be put at risk. No borrowings are permitted against those assets.

The Charity's short-term cash reserves may be required at short notice. As such, capital volatility cannot be tolerated and investment of these assets should be focused on minimising this.

The Charity's long-term cash reserves can be invested widely and diversified by asset class. Asset classes can include cash, bonds, equities, structured products, and any other asset that is deemed suitable for the Charity. The Managing Group have delegated responsibility from the Board for agreeing a suitable asset allocation strategy with the Investment Manager.

Currency

The base currency of the investment portfolio is Sterling.

Within the long-term non-property reserves, investments may be made in non-Sterling assets, but should not exceed 50% of the total investment portfolio value. Hedging is permitted.

Short-term cash reserves should be held in Sterling.

Credit

The Charity's cash balances should be deposited with institutions with a minimum rating of A- or invested in a diversified money market fund.

Ethical Investment

The Charity requires an ethical and conflict avoidance investment strategy to ensure that its investments do not conflict with its aims or independence. The Directors / Trustees will record their reasons for any decisions made regarding ethical and conflict avoidance investments and note any positive/negative screening considerations.

The Charity's ethical investment and conflict avoidance policy precludes investment in companies or institutions directly or indirectly linked with the Charity's tenants and must avoid conflicts of interest with tenants and The Directors / Trustees.

Reserves and Investment Policy

Management, Reporting and Monitoring

The Directors/Trustees have delegated the management of investments to a Managing Group. This group will consist of the Chair, CEO and one other Director/Trustee, usually the Finance Lead.

The Investment Manager will provide the following information on a quarterly basis to the Managing Group. The Managing Group will report to each Board meeting on valuation of investments, transaction report, cash reconciliation and performance analysis and commentary.

The Directors / Trustees have responsibility for setting this Investment Policy and the Managing Group has responsibility for monitoring non-property investments. An annual review in the Spring each year will be undertaken by the Chief Executive (in conjunction with the Managing Group and an independent financial advisor) on the performance of the Investment Manager and will make recommendations to the Directors / Trustees on proposed changes to the Investment Policy (if required).

Performance of the long-term cash reserves will be measured against inflation and agreed market indices. The return of the short-term reserves will be monitored against benchmark cash rates. The level of capital volatility will be monitored to ensure the risk profile remains appropriate for the Charity.



Chair

Bath Recreation Limited

Date Reviewed: July 2020

Safeguarding Policy

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Recreation

Background

The Charity's Objects are:

"The provision, with or without charge, of property in or near Bath (including, but not limited to, the Bath Recreation Ground) for use as indoor and outdoor recreational facilities for the benefit of the public."

Contacts

Safeguarding Officer:

Operations Manager Alexandra Hull operations@bathrec.co.uk Mobile: 07545209003

Policy Definitions

'Children and young people' – Anyone who is under the age of 18.

'Vulnerable adults' – Anyone aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and
- is experiencing, or is at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect
- has an illness affecting their mental or physical health
- has a learning disability
- suffer from drug or alcohol problems
- is frail.

Bath Rec - Bath Recreation Limited.

Disclosure and Barring Service (DBS) – The DBS is responsible for processing requests for criminal records checks, taking decisions on whether it is appropriate to place a person on or remove a person from the DBS Children's or Adults' Barred List for England, Wales and Northern Ireland.

Manage the risks - take reasonable steps to protect people who come into contact with the charity from harm including people who benefit from the charity work, staff, coaches and volunteers.

Purpose of Policy

Bath Recreation Limited fully recognises its responsibilities of everyone involved for protecting vulnerable adults, children and young people and safeguarding the welfare of all vulnerable adults, children and young people involved in its activities.

Bath Recreation Limited identify that because of its day to day contact with vulnerable adults, children and young people, coaches, employees and volunteers are well placed to observe the outward signs of abuse.

Aims

This policy applies to all Bath Recreation Limited employees, coaches and volunteers working on behalf of Bath Recreation Limited. The policy has five main elements:

- ensuring safe recruitment in checking the suitability of staff, coaches and volunteers to work with vulnerable adults, children and young people

Charity Registration Numbers:
Bath Recreation Ground Trust 1094519
Bath Recreation Limited 1173521
Company Registration Number: 10735297

Bath Recreation Ground
Pulteney Mews
Bath BA2 4DS

Safeguarding Policy

- raising awareness of vulnerable adults, children and young people protection issues and developing the skills needed to keep them safe through training
- implementing procedures for identifying and reporting cases, or suspected cases, of abuse
- understanding and supporting those vulnerable adults and children with additional needs
- establishing a safe environment in which vulnerable adults, young people and children can learn and develop.

Bath Recreation Limited will follow the children and young people protection procedures set out by the Guidance - Safeguarding and Protecting People for Charities and Trustees from the Charity Commission <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>: ensuring

- all employees and volunteers know the name of the Designated Safeguarding Officer
- all employees and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for recording any concerns and referring them to the safeguarding officer
- all staff receive vulnerable adult, children and young people protection awareness training and that lead safeguarding persons are trained every two years
- that the police are informed if the incident or concerns involves criminal behaviour, where necessary also refer to social services and report to other agencies and in some cases, a serious incident report should be forwarded to the Charity Commission. All safeguarding concerns with vulnerable adults, children or young people must be reported to the local safeguarding team
- safe recruitment practices are always followed. This includes obtaining Disclosure and Barring Service (DBS) certificates for any new staff and ensuring they are renewed at least every three years
- staff and volunteers understand their responsibilities for safer working practices.
- that any allegations against members of staff, coaches or volunteers, with a vulnerable adult, child and young person's protection aspect, are dealt with urgently, with concerns about staff and volunteers to be reported to the designated safeguarding officer
- that all other Bath Recreation Limited policies which have a safeguarding element (e.g. health and safety; SEN; Data Protection; Behaviour) are all consistent with this policy and with each other and where appropriate make cross-reference to this policy
- all staff and volunteers receive and sign for a copy of this policy.

Safeguarding Practices

All members of staff, coaches and volunteers must never:

- be inappropriate or have unnecessary physical contact with vulnerable adults, children and young people
- participate in any dynamic contact games or training with vulnerable adults, children and young people
- work alone with a vulnerable adult, child or young person
- consume alcohol whilst responsible for vulnerable adults, children and young people
- provide alcohol, drugs or other harmful substances to vulnerable adults, children and young people or allowing its supply
- smoke in the presence of vulnerable adults, children and young people
- have an intimate or sexual relationship with a vulnerable adult, child or young person developed as a result of being in a position of trust, including making sexually explicit comments or sharing sexually explicit material
- use inappropriate language or allow a vulnerable adult, child or young person to use inappropriate language
- allow allegations by a vulnerable adult, child or young person to go unchallenged, unrecorded or not acted upon

Safeguarding Policy

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Recreation

- cause an individual to lose self-esteem by embarrassing, humiliating or undermining the individual
- treat some vulnerable adults, children or young people more favourably than others
- use social media to connect with any vulnerable adult, child or young person which they meet whilst working on behalf of Bath Recreation Limited.

Positions of Trust

All staff, coaches and volunteers who work with vulnerable adults, children and young people are in a position of trust which has been invested in them by parents, the referring provider, carers and the vulnerable adult, child and young person. This relationship can be described as one in which the staff member, coach or volunteer is in a position of power and influence by virtue of their position. Having an intimate or sexual relationship with vulnerable adults, children and young people under 18 is unacceptable, even where there is apparent consent. A consensual sexual relationship between a staff member, coach or volunteer in a position of trust with a vulnerable adult or young person under 18 is contrary to the policy and procedures of Bath Recreation Limited and will be subject to disciplinary procedures.

Staff, coaches and volunteers must not develop a physical or emotionally dependant relationship with vulnerable adults, children and young people.

All those within Bath Recreation Limited have a duty to raise concerns about the behaviour of any staff member, coaches, volunteers, outside contractors and anyone in a position of trust with vulnerable adults, children and young people.

Policy Review

This policy will be reviewed annually.



Chair

Bath Recreation Limited

Date Reviewed: July 2020