



RACC-UK POLICY HANDBOOK 2025

Policies and Guidance were last updated and reviewed: August 2024

Prepared by :

Board of
Trustees

POLICIES

PROCEDURE

Social Media

This policy governs the publication of and commentary on social media by members, employees of Rare Autoinflammatory Conditions Community – UK (RACC – UK) and its related companies ("RACC- UK"). For the purposes of this policy, social media means any facility for online publication and commentary, including without limitation blogs, wiki's, social networking sites such as Facebook, LinkedIn, Twitter, Flickr, and YouTube. This policy is in addition to and complements any existing or future policies regarding the use of technology, computers, e-mail and the internet.

RACC- UK employees are free to publish or comment via social media in accordance with this policy. RACC- UK employees are subject to this policy to the extent they identify themselves as a RACC- UK employee (other than as an incidental mention of place of employment in a personal blog on topics unrelated to RACC- UK).

Notwithstanding the previous section, this policy applies to all uses of social media, including personal, by RACC- UK employees who is the Administrator, as their position with RACC- UK would be well known within the community. Publication and commentary on social media carry similar obligations to any other kind of publication or commentary. All uses of social media must follow the same ethical standards that RACC- UK employees must otherwise follow.

Setting up Social Media

Assistance in setting up social media accounts and their settings can be obtained from RACC- UK's Founder, Rachel Rimmer.

Your profile on social media sites must be consistent with your profile on the RACC- UK website or other RACC- UK publications. Profile information may be obtained from the Founder, Rachel Rimmer.

Official RACC- UK photographs must be used for your profile photograph. RACC- UK photographs can be obtained from Google Documents.

Don't Tell Secrets

It's perfectly acceptable to talk about your work and have a dialog with the community, but it's not okay to publish confidential information. Confidential information includes things such as unpublished details about our software, details of current projects, details of health, financial information, research. We must respect the wishes of our member regarding the confidentiality of current projects.



Protect your own privacy

Privacy settings on social media platforms should be set to allow anyone to see profile information like what would be on the RACC- UK website. Other privacy settings that might allow others to post information or see information that is personal should be set to limit access. Be mindful of posting information that you would not want the public to see.

Be Honest

Do not blog anonymously, using pseudonyms or false screen names. We believe in transparency and honesty. Use your real name, be clear who you are, and identify that you work for RACC- UK. Nothing gains you notice in social media more than honesty - or dishonesty. Do not say anything that is dishonest, untrue, or misleading. If you have a vested interest in something you are discussing, point it out. But also, be smart about protecting yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and be cautious about disclosing personal details.

Respect copyright laws

It is critical that you show proper respect for the laws governing copyright and fair use or fair dealing of copyrighted material owned by others, including RACC- UK own copyrights and brands. You should never quote more than short excerpts of someone else's work, and always attribute such work to the original author/source. It is good general practice to link to others' work rather than reproduce it.

Respect your audience, RACC- UK, members, and your co-workers

The public in general, and RACC- UK's employees and members, reflect a diverse set of customs, values and points of view. Don't say anything contradictory or in conflict with the RACC- UK website. Don't be afraid to be yourself but do so respectfully. This includes not only the obvious (no ethnic slurs, offensive comments, defamatory comments, personal insults, obscenity, etc.) but also proper consideration of privacy and of topics that may be considered objectionable or inflammatory - such as politics and religion. Use your best judgment and be sure to make it clear that the views and opinions expressed are yours alone and do not represent the official views of RACC- UK.

Protect RACC- UK members and business partners

Members, partners or suppliers should not be cited or obviously referenced without their approval. Never identify a member, partner or supplier by name without permission and never discuss confidential details of a customer engagement. It is acceptable to discuss general details about kinds of projects and to use non-identifying pseudonyms for a customer (e.g., Member 123) so long as the information provided does not violate any non-disclosure agreements that may be in place with the member or make it easy for someone to identify the member. Your blog is not the place to "conduct business" with a member.

Controversial Issues

If you see misrepresentations made about RACC- UK in the media, you may point that out. Always do so with respect and with the facts. If you speak about others, make sure what you say is factual and that it does not disparage that party.



Avoid arguments

Brawls may earn traffic, but nobody wins in the end. Do not try to settle scores, goad competitors, or others into inflammatory debates. Make sure what you are saying is factually correct.

Be the first to respond to your own mistakes

If you make an error, be up front about your mistake and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so. If someone accuses you of posting something improper (such as their copyrighted material or a defamatory comment about them), deal with it quickly - better to remove it immediately to lessen the possibility of a legal action.

Think About Consequences

For example, consider what might happen if a RACC- UK employee is in a meeting with a member or prospect, and someone on the member's side pulls out a print-out of your blog and says, "This person at RACC- UK says that product sucks."

Saying "Product X needs to have an easier learning curve for the first-time user" is fine; saying "Product X sucks" is risky, unsubtle and amateurish.

Once again, it's all about judgment: using your blog to trash or embarrass RACC- UK, members, or your co-workers, is dangerous and ill-advised.

Disclaimers

Wherever practical, you must use a disclaimer saying that while you work for RACC- UK, anything you publish is your opinion, and not necessarily the opinions of RACC- UK.

The can provide you with applicable disclaimer language and assist with determining where and how to use that.

Do not forget your day job.

Make sure that blogging does not interfere with your job or commitments to our members.

Social Media Tips

The following tips are not mandatory but will contribute to successful use of social media.

The best way to be interesting, stay out of trouble, and have fun is to write about what you know. There is a good chance of being embarrassed by a real expert, or of being boring if you write about topics you are not knowledgeable about.

Quality matters

Use a spell-checker. If you're not design-oriented, ask someone with more experience whether your blog looks decent and take their advice on how to improve it. The speed of being able to publish your thoughts is both an excellent feature and a great downfall of social media. The time to edit or reflect must be self-imposed. If in doubt over a post, or if something does not feel right, either let it sit and look at it again before publishing it or ask someone else to look at it first.

Enforcement

Policy violations will be subject to disciplinary action, up to and including termination for cause. Any members found in breach of this policy shall be removed from RACC-UK.



Safeguarding Everyone

This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers and sessional workers, students or anyone working on behalf of RACC - UK. This policy also applies to patients and their families.

The purpose of this policy:

- To protect all adults, children and young people who receive RACC - UK's services;
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding adults and child protection; RACC - UK believes that an adult, child or young person should never experience abuse of any kind.

We have a responsibility to promote the welfare of all adults, children and young people and to keep them safe. We are committed to practice in a way that protects them.

Legal Framework

This policy has been drawn up based on law and guidance that seeks to protect adults and children, namely:

- The Care Act 2014
- Children Act 1989
- United Convention on the Rights of the Child 1989
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Mental Health Act 2007
- GDPR - General Data Protection Regulation 2018 with data protection at 2018
- Special Educational Needs and Disability (SEND) Code of Practice: 0 to 25 years- Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing: Advice for practitioners providing safeguarding services to vulnerable children, young people, parents and carers; HM Government 2015
- Working together to safeguard children: a guide to inter- agency working to safeguard and promote the welfare of children: HM Government 2015.

This policy should be read alongside our policies and procedures on:

1. Equal Opportunities
2. Social Media policy
3. Complaints and compliments policy
4. Whistleblowing
5. Role of the designated safeguarding officer
6. Training, supervision and support with the option of continuous professional development
Recording and information sharing - Privacy statement 2018
7. Anti-bullying
8. Safe recruitment policy

We recognise that

- The welfare of the vulnerable adult is paramount, as identified in the Care Act 2014.
- The welfare of the child is paramount, as identified in the Children Act 1989.
- All adults and children, regardless of their age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.
- Some adults and children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs and other issues such as health.
- Working in partnership with adults, children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We will seek to keep adults, children and young people safe by

- Valuing, listening to, and respecting them
 - Appointing a Designated Safeguarding Officer (DSO) for children and young people, a deputy and a lead board member for safeguarding.
 - Adopting child protection and safeguarding practices through procedures and a code of conduct for staff and volunteers.
 - Developing and implementing an effective e-safety policy and related procedures.
 - Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures.
 - Recruiting staff and volunteers safely, ensuring all necessary checks are made. All staff and volunteers have a clear DB.
 - Recording and storing information professionally and securely and sharing information about safeguarding and good practice with children, their families, staff and volunteers via training, leaflets and posters.
 - Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately.
 - Using our procedures to manage any allegations against staff and volunteers appropriately and efficiently.
 - Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
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- Ensuring that we have effective complaints and whistleblowing measures in place and open to all staff, volunteers and members.
- Ensuring that we provide a safe physical environment for our adults, children and young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

PLEASE NOTE: Where patients / families request to receive support online using social media platforms, it is essential that patients / family members complete the questions before being approved into the online forum.

Patients must also complete the patient registry in order to verify their identity and allow us to provide safe and accurate support on an individual basis. Failure to do so may result in automatic removal / access to the online forums and necessary support resources.

In any situation where staff/ volunteers have face to face contact with patients and families:

- Staff / Volunteers should take care not to place themselves in a vulnerable position.
- It is advisable that any face to face contact with individual children or families is to be conducted in view of other adults.
- In a hospital setting, children and vulnerable adults would also be around healthcare professionals who also have safeguarding training and procedures in place.
- Patients and families will not attend the property in which the organisation is registered for insurance purposes. This is to protect themselves and staff / volunteers alike.
- Consent form must be signed by parents for children and young people under the age of 16 years old. For over 16 years, unless a person does not have the mental capacity to do so, they must sign consent forms themselves.

In addition to the above points, staff and volunteers will also be required to agree to this policy before carrying out any work directly with patients and families. Staff and volunteers must know where to access the risk register and know whom to address concerns with (Designated Safeguarding Officer).

Where allegations against a member of staff / volunteer in relation to the children and families supported by RACC - UK, then the designated safeguarding officer's role would be to contact:

Alison Beasley - Interim Designated Officer (LADO)

Email: LADO.SafeguardingChildren@Oxfordshire.gov.uk

Tel: 01865 810603

Contact details: RACC - UK's Designated Safeguarding Officer (DSO)

Name: Rachel Rimmer

Email: rachelrimmer@raccuk.com

CEOP <https://www.ceop.police.uk/safety-centre/>

NSPCC Helpline: 0808 800 5000

We are committed to reviewing our policy and good practice as our organisation develops.



Whistleblowing

Introduction

- Rare Autoinflammatory Conditions' Community- UK (RACC-UK) is committed to the provision of the highest quality services to its clients and to being open, honest and accountable in delivering these services. Whilst RACC-UK has set in place rules, regulations, quality standards and procedures to ensure that the highest standards of conduct and commitment to service are followed, irregularities, wrongdoing or serious failures in standards do sometimes occur. RACC-UK wants to identify and remove such malpractice in the performance of its services.
- The greatest deterrent to malpractice or wrongdoing is the probability that it will be reported and investigated; that those who are responsible for any malpractice will be punished; and that any wrongdoing will be promptly remedied.
- This Policy Statement is therefore intended to provide a clear indication that any malpractice on the part of either RACC-UK employees or Volunteers which comes to the attention of the organisation will be swiftly and thoroughly investigated.
- RACC-UK will also look at ways to ensure that such malpractice or wrongdoing can be prevented in the future.

Aims and Scope of the Policy

This policy provides all employees and volunteers of RACC-UK with

☒Processes by which they can raise concerns and receive feedback on any actions taken.

☒Reassurances that they will be protected from reprisals or victimisation for whistleblowing.

The examples listed below illustrate the types of issues which might be considered as malpractice or wrongdoing and could justifiably be raised under this Whistleblowing policy: Disclosures of malpractice or wrongdoing should be made in the public interest.

- (a) Any unlawful act, whether criminal or in breach of civil law; any failure to comply with legal obligations; any situation where a miscarriage of justice has occurred, is occurring or is likely to occur;
- (b) Maladministration, as defined by the Local Government Ombudsman;
- (c) Breach of any statutory Code of Practice;
- (d) Breach of, or failure to implement or comply with, any policy determined by RACC-UK;
- (e) Failure to comply with appropriate professional standards;
- (f) Corruption or fraud, including obtaining money (e.g. grants) without entitlement;

- (g) Misuse of assets, including stores, equipment, vehicles, building, computer hardware and software;
- (h) Endangering the health and safety of any individual with actions which are likely to cause physical danger, or which could give rise to a risk of significant damage to property;
- (i) Failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income, to RACC-UK;
- (j) Abuse of power;
- (k) Unfair discrimination;
- (l) Causing damage to the environment;
- (m) Deliberately concealing information in relation to any of the items on this list.

This Whistleblowing policy is intended to provide a channel for those instances where the person reporting the matter feels that, for any reason, they cannot make use of the existing complaints or grievance procedures. For example, an employee wishing to make a complaint about a breach of their own employment contract should do so through the grievance policy.

This Whistleblowing policy is also intended to cover any concerns that staff may have about the conduct of individuals occupying positions of trust within the organisation which could be detrimental to the safety or wellbeing of children, young people or vulnerable adults and where staff, for whatever reason, feel unable to raise them under the organisation's standard child protection procedures for dealing with such allegations. It would include issues about:

- Unprofessional behaviour
- Bullying by staff
- Any form of abuse (physical, sexual, emotional or neglect)
- Name calling
- Personal contact with children, young people or vulnerable adults which is contrary to the organisations policies and codes of conduct
- Any form of racial abuse
- Inappropriate sexualised behaviour
- Knowledge about an individual's personal circumstances which may indicate they could be a risk to children or unsuitable to work with children
- Please be mindful that these are examples of concerns, and that this is not an exhaustive list.

Co-operation and Safeguards

In many cases, it is the employees and volunteers at RACC-UK who are likely to be in the best position to learn of any malpractice or wrongdoing and to identify something which falls below the standards which RACC-UK requires. RACC-UK expects the fullest cooperation of all its employees and volunteers in securing the highest standards of service. This means that, where employees or volunteers of RACC-UK are aware of, or suspect malpractice, they should not hesitate to report these suspicions. Where they fail to report their suspicions, they themselves become implicated in the wrongdoing. RACC-UK will treat failure by an employee or volunteer to report such concerns as a serious matter.



RACC-UK will respect the confidentiality of any whistleblowing complaint received, where the complainant requests that confidentiality be maintained. However, it must be appreciated that it will be easier to follow up and verify complaints if the complainant is prepared to give his/her name. Unsupported anonymous complaints and allegations will have to be treated with caution.

Any reporting system will be of little effect if those who should use it are afraid that, as a result of making their report, they may experience recriminations, victimisation or harassment. RACC-UK will, therefore, not tolerate any attempt on the part of any employee or volunteer to take reprisals against any person who has reported any serious and genuine concern relating to any perceived malpractice. RACC-UK will treat any such recriminations, victimisation or harassment by any employee or volunteer as a serious matter.

Whistle-blowers may also have statutory protection under the Public Interest Disclosure Act 1998, which aims to protect individuals who make certain disclosures of Information in the public interest and who are then victimised in their employment.

RACC-UK will conscientiously investigate any complaints which it receives. As a consequence of this, it will view very seriously any false or malicious allegations which it receives and will regard the making of any deliberately malicious or vexatious allegations by any employee or volunteer as a serious disciplinary offence.

How to raise a concern

It is envisaged that the whistle-blower's line manager will normally be the first point of contact. It will be their responsibility to investigate all matters reported to them promptly and in accordance with the procedure notes issued.

There may be times when an employee or volunteer feels unable to use the above procedure, for example when the whistle-blower feels that their Manager may be involved in the malpractice. In such instances, the whistle-blower should raise their concerns directly with the Organisation Director.

Where this is not appropriate, the whistle-blower should raise their concerns with the Chairperson of the Board of Trustees, who has been appointed to act as the RACC-UK Whistleblowing Officer, with the following remit:

- (a) To receive and record any complaints under this policy;
 - (b) To ensure the confidentiality of any whistleblowing complainant who requests that their complaint be treated in confidence;
 - (c) To investigate promptly any whistleblowing complaint and to respond directly to the complainant;
 - (d) To report to the appropriate person (line manager/ Organisation Director/ Chairperson of the Board of Trustees) any serious concerns highlighted in the course of their initial investigation, and to recommend the use of any relevant statutory powers or duties.
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(e) To report as appropriate to the Board of Trustees by email: complaints@raccuk.com

Where possible concerns should be presented in the form of written statements. This will provide the whistle-blower with the opportunity to set out the background and history of the concern, giving names, dates and places wherever possible, and outlining the reason why the complainant is particularly concerned about the situation.

Although whistle-blowers are not expected to prove the truth of an allegation, they will need to demonstrate to the person they choose to contact that there are sufficient grounds for concern.

How RACC - UK will respond

Some concerns may be resolved by agreed action without the need for investigation.

Within 10 working days of a concern being received, RACC-UK will write to the whistle-blower.

☒ Acknowledging that the concern has been received;

☒ Indicating how it proposes to deal with the matter;

☒ Stating whether further investigations will take place and if so by whom; but if not, why not.

- When any meeting is arranged, the whistle-blower has the right, if they so wish, to be accompanied by a professional association representative or a friend who is not involved in the area of work to which the concern relates.
- RACC-UK will take steps to minimise any difficulties which the whistle-blower may experience as a result of raising a concern.
- RACC-UK accepts that the whistle-blower needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, information about the progress and outcome of any investigations will be given.
- It may be necessary for the whistle-blower to give evidence in criminal or disciplinary proceedings.
- If the concerns are not confirmed by an investigation, the matter will be closed. The whistle-blower will not be treated or regarded any differently for having raised the concern and their confidentiality will continue to be protected where previously requested.

Contact:

Email: complaints@raccuk.com

Address: c/o RACC-UK, Flat 1, 24 Swan Street, Eynsham, Witney, West Oxfordshire, OX29 4HU

Phone: (+44) 07377091552



Website - Data Protection

By means of this privacy policy, we would like to inform the public about the nature, purpose and extent of the personal data collected, used and processed by us. In addition, we would like to inform you about the rights granted to you by means of this privacy policy. Rare Autoinflammatory Conditions Community - UK, as the controller, has implemented numerous organisational and technical measures to ensure the most complete protection of personal data processed through this website. Nevertheless, Internet-based data transmissions can, in principle, have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data to us in alternative ways, such as by mail or telephone.

General and statutory information

Note to the responsible body

The person responsible in accordance with the General Data Protection Regulations and the Information Commissioner's Office is:

Rare Autoinflammatory Conditions Community – UK (RACC-UK)

Flat 1, 24 Swan Street, Eynsham, OX29 4HU, United Kingdom

E-Mail: info@raccuk.com

Registered Charity in England & Wales: 1184846

Responsible entity is the natural or legal person who, alone or in concert with others, decides on the purposes and means of processing personal data (such as names, e-mail addresses, etc.).

Cancellation of your consent to data processing

Many data processing operations are only possible with your express consent. You can revoke an already given consent at any time. An informal message by e-mail sent to us is enough. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

Right of appeal before the relevant supervisory authority

In the event of data protection violations, you, or the person concerned, have a right of appeal to the competent supervisory authority. The competent supervisory authority for data protection issues is the Information Commissioner's Office. A list of data protection officers and their contact details can be found on the following link: <https://ico.org.uk/>

Right to data portability

You have the right to have data, which we process automatically, on the basis of your consent, or in fulfilment of a contract, delivered to you or to a third party in a common, machine-readable format, provided that such data is available in a common, machine-readable format. If you



require the direct transfer of the data to another person in charge, this will only be done as far as is technically feasible.

SSL or TLS encryption

This site uses for security reasons and to protect the transmission of confidential content, such as requests that you send to us as a site operator, an SSL or TLS encryption. An encrypted connection is indicated by the browser's address bar changing from "http: //" to "https: //" and the lock icon in your browser bar. If SSL or TLS encryption is enabled, the data you submit to us cannot be read by third parties.

Information, blocking, deletion

You have, in accordance with the legal and statutory requirements in force at any given time, the right to free information about your stored personal data, its origin and recipients and the purpose of the data processing and where applicable, the right to have this data corrected, blocked or deleted. For further questions about personal data you can contact us at any time at the above address.

Objection against advertising e-mails

The use of contact data published within the context of the imprint obligation for the purpose of sending unsolicited advertising and information materials is hereby rejected. The operators of the pages expressly reserve the right to take legal action in the case of transmission of non-solicited advertising material, e.g. as spam mail.

Data collection practices on our website

Our website

Our website ("online presence") includes the domain:

www.raccuk.com

The following information refers to and applies to the domains mentioned above.

Hosting

Our website is hosted by:

WordPress

The hosting services provided are for the provision of infrastructure and platform services, database services, computing capacity, security and storage space as well as technical maintenance services that we use to operate our online services.

Therefore, we or our hosting provider on our behalf, process inventory data, contact data, content data, contract data, usage data, meta and communication data of interested parties and the visitors of this online-service.

Basis

The basis for data processing is Art. 6 para. 1 lit. b DSGVO, which allows us to process data in order to fulfil a contract or pre-contractual measures.

Cookies

The internet pages partly use so-called cookies. Cookies do not damage your computer and



contain no viruses. Cookies are used to make our website more user-friendly, effective and secure. Cookies are small text files that are stored on your computer and stored by your browser. By using cookies, we can provide you with more user-friendly services that would otherwise not be possible without the cookie setting. By means of a cookie, the information and services on our website can be in your interest. Cookies enable us to recognize you on our website. The purpose of this recognition is to make it easier for you to use our website.

Most of the cookies we use are so-called "session cookies". They will be deleted automatically at the end of your visit. Other cookies remain stored on your device until you delete them. These cookies allow us to recognize your browser on your next visit.

You can set your browser so that you will be informed about the setting of cookies and allow cookies only in individual cases, exclude the acceptance of cookies for certain cases or in general, and activate the automatic deletion of cookies when closing the browser. Disabling cookies may limit the functionality of this website.

Server log files

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

- browser type and browser version
- used operating system
- referrer URL
- host name of the accessing computer
- time of the server request
- IP address

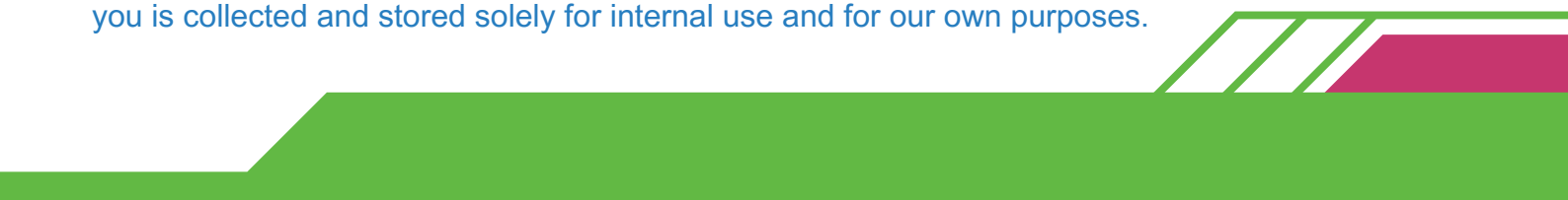
and other similar data and information used in the event of an attack to our information technology systems. There is no merge of this data with other data sources. When using this general data and information, we draw no conclusions about you. Rather, this information is needed to

- to deliver the contents of our website correctly
- to optimize the content of our website as well as its presentation
- to ensure the permanent functionality of our information technology systems and the technology of our website, as well as
- to provide law enforcement with the necessary information for prosecution in the event of a cyberattack.

This anonymously collected data and information is evaluated by us, on the one hand statistically and further with the aim to increase the data protection and data security in our organization, in order to ensure an optimal level of protection for the personal data processed by us. The anonymous data of the server log files are stored separately from all personal data provided by you.

Contact / contact form

You have the possibility to contact us (for example via contact form, e-mail or via social media channels). When you contact us, your details will be recorded for the purpose of processing your contact request and its handling. The personal data which is transmitted to us in the input mask, is that which will be used for establishing contact with you if needed. The personal data entered by you is collected and stored solely for internal use and for our own purposes.



By registering on our website, the IP address assigned by the Internet service provider (ISP), the date and time of registration are also stored. The storage of this data takes place in the background only so that the misuse of our services can be prevented, and this data if necessary, can be used to clarify committed offenses. In this respect, the storage of this data is required to secure us. Personal data will not be given to third parties, as long as there is no legal obligation to disclose it or disclosure is required by law enforcement services.

Social media, plug-ins and tools

Use of social media

We use a variety of online sites within social networks and platforms (e.g., Facebook, Instagram, YouTube, Twitter, etc.) to communicate with users, and to provide information about our services. When you visit another network or platform, the business connections and privacy policies of each operators apply. Your personal data will be processed in accordance with EU and Swiss data protection regulations, as well as the data of the users, if you or other users communicate with us within the social networks and platforms, e.g. write posts on our online groups and send us messages.

YouTube

We embed the videos on the YouTube platform of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA.

If you visit any of our YouTube plug-in-enabled sites, you will be connected to the YouTube servers. This tells the YouTube server which of our pages you have visited. If you are logged in to your YouTube account, YouTube allows you to assign your surfing behaviour directly to your personal profile. You can prevent this by logging out of your YouTube account.

Analysis Tools and advertising

Google Analytics

This website uses functions of the web analytics service Google Analytics. Provider is Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there.

Your rights in connection with personal data

Information, rectification and transmission

You can request information about your personal data stored with us about. You are also entitled to request the correction of incomplete, incorrect or outdated personal data. To the extent required by the applicable law, you may also request that we disclose personal information that you provide to us or to other companies.

Contradiction

We respect your right to object to any use or disclosure of your personal information that is not - legally - required for our legitimate needs - to fulfil a contractual obligation

If you object, we will work with you to come up with an acceptable solution.



You may also, at any time, withdraw the consent given to us about the processing of your personal information.

Deletion

You have the right to have your personal data deleted in accordance with the law. This applies, for example, if your data is outdated or processing is not required or unlawful; if you withdraw your consent to any processing based on such consent; or if we find that we should oppose an objection raised by you against processing on our part. Under certain circumstances, we may need to keep your personal information in accordance with our legal obligations or to assert, exercise or defend any legal claims. Legal retention periods remain unaffected.

Final clause

We may amend our Data Protection Policy at any time by posting it on our website.



Data Protection

GENERAL PRINCIPLES

1. Rare Autoinflammatory Conditions' Community- UK (RACC-UK) recognises the right to privacy of the individual as a basic human right. We accept that personal details about an individual belong to that individual. Accordingly, we undertake to respect the confidentiality of certain information.
2. Personal data is defined as “information about a living individual who is identifiable by that information, or who could be identified by the information combined with other data”. It includes names, addresses, identifying descriptions and information relating to individuals such as bank details or personal attributes.
3. Confidential information is defined as verbal or written information which is not meant for public or general knowledge, or information which is regarded as personal by clients, members, trustees, staff or volunteers. It includes expressed opinion about a person or intentions regarding a person.
4. This policy relates to the protection of the privacy of staff, volunteers, job applicants, trustees, members, service users and any other person about whom RACC-UK holds personal information of a formal or an informal nature.
5. Confidentiality is based upon a reasoned concern for the interests of the person to whose personal information RACC-UK has access. Respecting confidentiality means that information may be disclosed only with consent and when necessary, and that consultation and discussion remains within those boundaries (Refer to Staff Obligations below/Guidelines on disclosing information). This protects the integrity of both RACC-UK and of individuals.
6. Where there is uncertainty about issues in respect of confidentiality, advice should be sought from line managers and, where appropriate, trade unions.
7. Failure to observe this policy or misuse of personal data is a disciplinary offence and may even constitute a criminal offence. Please refer especially to the section titled “Staff obligations”.



Data Protection Act 1998

RACC-UK takes seriously its obligations under the Data Protection Act 1998. We are registered with the Information Commissioner. Our registration, which is renewed annually, allows us to collect, store and use certain personal information following strict guidelines. These guidelines define the purposes for which we hold information: in our case, this is information for the purposes of staff administration, membership administration, fundraising and for the purposes of providing services to clients in respect of our charitable objectives.

Within these groups, the guidelines define the data subjects (i.e. the individuals about whom that information is held), the classes of data (i.e. what kind of information is held) and the data recipients (i.e. who has access to it).

In particular, the Data Protection Act requires that personal information should be adequate, relevant and not excessive; that it should be stored securely and used only for its intended purposes; and if possible processed only with the consent of the person concerned. RACC-UK will comply with these requirements and will extend the principles of data protection to apply to all forms of personal information as specified in our ICO registration certificate registration number ZA250303.

PERSONAL INFORMATION RELATING TO STAFF

RACC-UK holds information about employees to do with their working life as necessary to fulfil its obligations as a responsible employer. Much of this information is highly personal. RACC-UK recognises its duty to safeguard any and all data held by all means possible and to notify staff about what data is kept on file and why, along with information about how this data can be accessed and by whom.

What data is held

Information held by RACC-UK will include:

- Information relating to staff recruitment and selection, e.g.: application forms; short listing and interview assessments; references; proof of eligibility to work in the UK; where relevant, unspent criminal records and/or the outcome of Disclosure and Barring Service (DBS) investigations;
- Personal details of home address, phone numbers next of kin; emergency contact information
- Information necessary for payment of salaries, such as bank details, national insurance number, details of deductions to e.g. the courts or trade unions, expenses claims;
- Information about academic and vocational qualifications and experience;
- Notes of probationary and annual reviews and supervisions;
- Sick notes, and medical assessments, including information relating to disabilities;
- Absence records, including sickness absence, compassionate leave, unauthorised absences;
- Time sheets and holiday sheets;
- Details of grievance and disciplinary proceedings including current warnings (within the timescales allowed by the appropriate policies);
- Reference requests and responses.

“Sensitive” data, such as details of racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sexual preferences, or criminal convictions will only be processed if necessary or advantageous to the employment relationship and with the explicit consent of the individual employee.



Fit notes, absence records and other health-related information are classed as “sensitive information” and care must be taken to ensure that these are stored securely, and that access is limited to staff who need to see them.

Why is the data held?

The data kept on staff relates primarily to their employment relationship with RACC-UK and will be used for administering and managing their employment.

Information may also be kept supporting applications for funding or insurance or for responding to requests for information from Government offices, the Charity Commissioners or other reputable bodies. Where possible, sensitive information will not be identified with individuals but will be given in anonymised statistical formats only.

No unrelated data will be kept and any sensitive data (excluding health and criminal records) held by the organisation will be deleted at the request of the individual concerned.

Where is the data stored?

All personnel data is kept either in locked filing cabinets and /or in password protected computer files. Most personal data is kept in individual personnel files in the Organisation Director’s office and these are locked. Bank details are kept by the Chairperson on the secure, password protected online bank system. Staff monitoring information is kept in a locked cabinet and other staff related information is kept in staff files with supervision records, plus any job-related information necessary for management.

Who is covered by this Policy?

Employees give implied consent to RACC-UK to hold data as described above and to access and use it as outlined, by accepting an offer of employment and agreeing to their Written Statement of Employment Particulars.

Access to staff data is restricted to management at the appropriate level or to senior administrative staff on a ‘need to know’ basis.

Information may also be disclosed as required by law, contract or on a ‘need to know’ basis to trustees, auditors, pension providers, funders, insurers, government departments or other relevant parties/individuals.

Job applicants are also covered by the Data Protection Act and by this policy.

RACC-UK will design and process application forms and other information relating to applicants in line with the Act. RACC-UK will only request information which is relevant, not excessive and for the purposes of the selection process only.

This information will be securely stored and will only be accessed by staff or other agents of the organisation who need it for purposes of administration or selection. It will not be kept for longer than is necessary for the needs of the organisation. Information relating to unsuccessful job applicants will normally be held for one year, after which time it will be shredded.



Sensitive information relating to health, disability, criminal records and immigration status will only be requested where necessary for the protection of the organisation and/or its service users and will not be disclosed to anyone who does not need to know.

Sensitive information relating to gender, age, ethnicity and disability may be requested but will be used for equality and diversity monitoring purposes only. This information will not form part of the selection process and will not be retained in any form which identifies the individual to whom it pertains.

The identity of job applicants will be kept confidential as far as possible and for as long as possible. Where a job offer is made, the names of the successful candidates will not be made public until the appointment has been accepted and confirmed.

Feedback on interview performance will be given, on request, without specific reference to other candidates.

How long will data be held?

Most information will be retained for as long as a person is employed by RACC-UK and for a reasonable period thereafter, not exceeding 6 years.

Sickness records will be kept for period not exceeding 2 years.

Disciplinary proceedings and warnings will be kept for the time stipulated in the policy concerned.

Recruitment papers from unsuccessful applicants to a job will be kept for a reasonable period not exceeding one year.

DBS documentation will not be retained, although a record will be kept of the fact that a satisfactory/unsatisfactory CRB check has been made. This will be kept on file for as long as necessary, or until the next CRB check is carried out.

I.T.

Personal data held on computers (including files, emails, databases etc) and personal data downloaded from the web, are subject to the same control and restrictions as paper-based data. Staff must take particular care when using any personal data in these contexts. In particular, no personal information should be posted on the internet in any circumstances without compelling reasons and the explicit consent of the individual to whom the information relates.

Monitoring of staff activity

Staff should be aware that RACC-UK may, if they have reason to do so, monitor their use of the internet and/or emails. Private emails will never be opened intentionally but



staff should be aware of the possibility of accidental access and of the right of managers to question and investigate private use. Deliberate monitoring will only take place where there is good reason to suspect a disciplinary offence or another justified concern exists. Please refer to the policy on Private Telephone and Internet Use.

Performance and quality control monitoring will be overt and for a clear purpose. Covert monitoring will not be permitted.

References

References given by an employer about a person currently working for them are exempt from some aspects of normal data protection rules. This means that an employee has no automatic right of access to a reference written about them by RACC-UK. However, as a matter of good practice, RACC-UK will only respond to reference requests that are clearly authorised by the employee concerned.

As a rule, employment-related references should only be given by the Organisation Director. However, other line managers may provide references for their own staff where appropriate, provided these are checked and authorised prior to sending by the Organisation Director.

Personal references should be clearly identified as such and should not be produced on RACC-UK 's headed paper.

All references must be objective, truthful and justifiable.

As a general rule, telephone references should not be given. Where time does not allow for a written reference to be prepared the referee should seek the consent of the job applicant and confirm the identity of the person requesting the reference. Referees should keep a written record of any information which is imparted over the telephone and which might be taken to form part of their reference.

Referees should bear in mind that although there is no automatic right for the subject of the reference to see it before it is sent, they will usually have a right to access any references written about them once they are received by a new/prospective employer.

SUBJECT ACCESS REQUESTS

Staff are entitled to see their own personnel files. To do so, they should arrange a mutually convenient time with their line manager. Access may be denied or limited where it involves disclosing information about or from an identified third party (e.g. a colleague) unless the third party concerned has given consent to the disclosure of that information.

As well as taking action to protect third party confidentiality, RACC-UK will not respond to subject access requests which:

- disclose any information relating to management forecasts where this could jeopardise the business effectiveness of the organisation;
- reveal legal proceedings against an individual, except to those directly concerned.

STAFF OBLIGATIONS

The Chairperson is the Registered Data Controller and is responsible for notification to the Information Commissioner. She should be referred to with any questions relating to data protection or confidentiality.



However, all staff are responsible for ensuring compliance with this policy and must:

- Ensure that they have read and understood this policy as it relates to them;
- Ensure that data which they supply, or for which they are responsible, is up-to-date, accurate, fair and relevant to its purpose. This will include information about themselves. Staff must notify the organisation of any changes in their circumstance to enable the organisation to update personnel records accordingly;
- Not keep any records on other individuals (whether other employees or clients/service users) which are unnecessary, incorrect or which contain unfounded opinion or speculation;
- Not share personal information about other members of staff or clients/service users (e.g. sickness, personal circumstances), that they know as a result of handling confidential information (e.g. sick notes, application forms) or which is disclosed in confidential settings (e.g. supervision or counselling), without that person's unambiguous agreement;
- Keep data secure. Paper and external computer files must be locked up; computers must be password protected; laptops and computer disks containing personal information, open computer screens, or open paper files must not be left unattended;
- Not disclose, share or transfer outside the organisation any personal information relating to other staff, volunteers, trustees, or clients/service users without the explicit consent of the individual concerned;
- Dispose of personal data safely. Paper notes and records must be shredded or disposed of as 'confidential waste'. Hard drives of redundant PCs must be wiped clean before disposal.

Particular care must be taken where personal data is processed 'off-site', whether at home or in other locations. This presents a greater risk of loss, damage or theft and staff must take appropriate security precautions.

GUIDELINES ON DISCLOSING INFORMATION TO INTERNAL AND EXTERNAL SOURCES

Internal information sharing

RACC-UK recognises that Trustees, staff and volunteers may need to share personal information with others internally within RACC- UK. This might include, for instance, discussion of client issues during supervision, discussion of situations to gain experience and opinion from colleagues, or "on the job" training. Care must be taken that this kind of information sharing is not done publicly or where it can be overheard. Such conversations should, wherever possible, be held without explicitly identifying the individual or organisation under discussion.

Supervision

Supervision sessions are in general confidential to the supervisor, the Organisation Director and the Trustees of the organisation.

Ground rules for when and why confidentiality may be broken should be agreed at the start of a supervision relationship and might include, for instance:

- information about the progress of work against funding targets;
- complex or problematic case management;



- discussion of the implications for colleagues of a request for flexible working;
- imparting certain information to colleagues about others' personal circumstances which are temporarily affecting performance;
- discussion of grievances or concerns about performance with a more senior manager.

Wherever possible, agreement about any breach of confidentiality should be reached in advance of the disclosure taking place.

Although the supervisor is bound by confidentiality, it is helpful for the supervisee to inform the supervisor if there are any personal circumstances which are particularly sensitive.

Answering requests for personal staff information

Personal information about a colleague should not usually be discussed with other staff or people outside RACC-UK without that person's permission. Personal details including address and phone number, health matters or personal circumstances may not be passed on without explicit consent.

It is usually safe to reveal a colleague's work contact (telephone and email address) in response to an enquiry regarding a work function, although these details should not be given to someone wishing to contact a colleague on a non-work-related matter.

However, staff must not reveal personal details of other staff members to unknown or unverified external sources, even where these claim to be family members, friends, Government bodies or the police.

Strategies to deal with such enquiries could include:

- Asking the enquirer to put their query in writing or into an email, if appropriate backed up by documentary evidence to support the request.
- Informing the enquirer that a message will be passed on, either asking the person to contact the enquirer directly or agreeing to pass on a sealed envelope/incoming email message to the person;
- Telling the enquirer that you will phone back once you have collected/verified the information required.

ORGANISATIONAL INFORMATION

Trustees, staff and volunteers are bound by confidentiality in all matters relating to the internal affairs of RACC-UK. Confidential information concerning Board meetings, staff meetings, finances, recruitment, planning etc should not be disclosed outside the organisation unless authorisation is given to do so. This does not apply to disclosures made under the Public Interest Disclosure Act ("whistle blowing"). See also Subject Access Requests above.

No statements concerning internal matters or policy may be made to the media without the express permission of the Organisation Director in consultation with the Board of Trustees.



PERSONAL INFORMATION RELATING TO SERVICE USERS

- RACC-UK is committed to respecting the confidentiality of those who use and/or support its services. This means respecting the right of members, benefactors, beneficiaries and service users to privacy and their right to expect that any personal information they give us will not be discussed or passed on to anyone outside RACC-UK without their permission.
- Please refer to “staff obligations” above for general instructions on the collection, use, storage and disposal of all personal information associated with the RACC-UK.

What

- Personal or sensitive information could include names and addresses, membership details, medical and psychological conditions, financial status, employment status, living arrangements, criminal offences, and internal organisational issues/disputes. The information may be given in conversation or in written form, for example on an application/interview form or email.

Why

- RACC-UK keeps information on its clients/service users for the purposes of providing a service and meeting client needs.
- It keeps information for the purposes of supporting funding applications, monitoring how funds are spent and responding to request for information from Government offices, the Charity Commission and other reputable organisations. Statistical and depersonalised information may be used for campaigning purposes or publicity purposes.
- No unrelated data will be kept, and any sensitive data held by the organisation will be deleted at the request of the individual concerned.

Where

- All personal data is kept in locked filing cabinets and/or in password protected computer files.

RECORDING AND ACCESSING DATA

- Written records of any dealings with clients/service users may be made with the client’s permission if the purpose of such records is clearly explained to the client. Only essential information should be recorded, and these records must be processed in line with Data Protection principles, stored securely and destroyed when no longer needed. Voluntary agreement to supply personal information such as names and addresses will be taken to imply consent to recording that information for RACC-UK necessary purposes. However, where practicable, data protection information will be given, and explicit consent will be sought (or the opportunity to withdraw consent will be offered) on an authorisation form.

PASSING ON INFORMATION

- Where client information is to be shared with a partner organisation or where RACC-UK is contacting a third party on the client’s behalf, the client must if possible and practicable confirm their agreement by giving signed authorisation.
- Where funders require personal information about the beneficiaries of services for audit purposes, this information will be collected on forms which clearly indicate who will receive the information and include provision for service users to sign a consent declaration.



Personal information should not be conveyed to other organisations or individuals via telephone calls or faxes without adequate safeguards regarding confidentiality.

External requests for information about an individual should not be agreed to. Where appropriate, staff may agree to pass on the request to that individual to respond to if they so choose. See advice above for strategies for dealing with requests for information from unknown or unverified enquirers.

Email communications may not be private – please see RACC-UK policy on email and internet use.

Names or contact details should never be released to the media in response to requests for “case studies”. Media enquiries may, however, be passed on to service users so that they can choose whether to respond to them.

Statistical information may be used for research, monitoring and funding purposes but must not be attributable to an individual. Where, for publicity purposes, RACC-UK wishes to use an attributed quotation from a client or service user the individual’s express permission must be sought before this can be used.

COLLECTING AND SAFEGUARDING INFORMATION

RACC-UK also recognises its duty to safeguard the information it holds on external groups and individuals. RACC-UK will regularly update information, dispose of outdated data and check that storage and archive systems are secure.

All written materials i.e. membership applications and packs, registration forms, newsletter forms, training application forms etc will be designed to ensure that only necessary data is being collected and that this is kept with permission.

If RACC-UK wishes to use personal information for purposes such as “direct marketing” (e.g. of courses or new services on offer), the organisation will inform the person concerned at the time of collecting the data that it may be used for this purpose. People/organisations will be provided with the opportunity to opt out of being contacted in this way (e.g. by ticking an opt-out box on a form).

Mailing and membership lists will only be passed on to other organisations/individuals to comply with funding/legal requirements or with the express consent of those listed.

SUBJECT ACCESS REQUESTS

Any member/user of RACC-UK is entitled to know what information is held about them, why and where it is held and who can access it. They have the right to see this information and to correct it if necessary. To see information, they should contact the Organisation Director who will arrange a mutually convenient time for this or who will facilitate the involvement of other relevant staff.

EXCEPTIONS

RACC-UK reserves the right to break confidentiality if it believes that:

- A child is at risk of being harmed
- A person’s life or safety is at risk
- If required by statute (e.g. there is a legal obligation to report drug trafficking, money laundering, terrorist activity to the police)



- If required under a contractual obligation (e.g. where services are purchased by a local authority and that contract requires disclosure of certain information)
- If required by a court order.

Information may also be disclosed if the individual concerned has given explicit, preferably written, consent.

Maintaining the confidentiality of identifiable third parties during a “subject access request” will be considered on a case by case basis.

In all the above cases, the Organisation Director (or if unavailable the Chair or Vice Chair of Trustees) must be informed immediately.

In other cases where breaking confidentiality may seem appropriate, this must only be done with the knowledge of appropriate managers or trustees and the person whose confidentiality is to be breached must be informed. They should be informed of their right of complaint and appeal.

Related policies

Confidentiality Policy

Equality and Diversity Policy

Whistleblowing

Recruitment and Selection

Social Media Policy

Legislation:

Data Protection Act 1998

Public Interest Disclosure Act 1998

Further information

Information Commissioner: www.ico.gov.uk

For general information, go to “For Organisations”, “Data Protection” and the “Document Library” list for a lot of helpful leaflets. Look especially at the “Quick Guide to the Employment Practices Code” on http://www.ico.gov.uk/upload/documents/library/data_protection/practical_application/quick_guide_to_employment_practices_code.pdf

or follow links “For Organisations” to “Topic Specific Guides” to “Employment”

or for Notification, follow “What the ICO covers” to “Data Protection” to “Notification”

Dept for Business, Enterprise and Regulatory Reform:

www.berr.gov.uk/sectors/infosec/infosecadvice/legislation/policystandards/legislation/practicaldataprotection/page33365.html

(www.berr.gov.uk and follow links through Business Sector, Information Security, Business Advice, Legislation, Practical Data protection)



EQUITY AND INCLUSION STATEMENT

Rare Autoinflammatory Conditions Community – UK (RACC – UK) aims to promote equality and diversity as an employer and seeks to ensure that equality and diversity principles underpin all areas of the organisation's work and service provision.

RACC - UK recognises that many people and groups suffer discrimination and face serious barriers when trying to fulfil their true potential. It also recognises that not all forms of unreasonable and unfair discrimination are the subject of legislation. It is the aim of this organisation to take positive steps to redress discrimination, to improve equality of opportunity and to combat any unreasonable or unfair treatment which places people at a disadvantage for any reasons not directly related to their ability to do a job for this organisation or to their eligibility to receive services from us.

In most cases it is unfair and unlawful to discriminate against people because of a range of Protected Characteristics as defined by the Equality Act 2010. These include gender, pregnancy, race, colour, nationality, ethnic and national origin, sexuality/sexual orientation, gender reassignment, religion or belief, age, or because they are disabled, married, pregnant, a member of a trade union, work part time or on a fixed-term contract.

However, we recognise that people may experience discrimination for many additional social, educational and economic reasons such as their language, health, physical or mental disability, HIV status, caring responsibilities, trade union activity, where they live, how they speak and whether they work flexibly. This policy will apply equally to all these circumstances.

RACC - UK will not tolerate discrimination (direct, indirect, by association or because of perception of a protected characteristic), harassment, bullying, victimisation or abuse of people who are members of staff or of people connected with the services provided by RACC - UK.

A separate anti-discriminatory recruitment and selection policy outlines the specific steps which RACC - UK will take to ensure that its recruitment practice is without bias and that its selection decisions are based solely on fair and justifiable, job related criteria.

MANAGEMENT ISSUES AND DELIVERY MECHANISMS

RACC - UK Board of Trustees has ultimate responsibility for the equality and diversity policy. It is however the responsibility of the Chairperson to implement, monitor and evaluate the equality and diversity policy in terms of employment practice and service delivery. She is also under a duty to ensure that the Board of Trustees is regularly kept informed of the policy's implementation and the implications of the Board of Trustees' decisions and policies for equality and diversity issues.



- All employees and Board of Trustee members will be informed that an equality and diversity policy is in operation and that they are bound to comply with its requirements. The policy will also be drawn to the attention of RACC - UK staff, funding agencies, job applicants and those using the services of RACC - UK.
- The “Equality and Diversity Statement” above shall be displayed in our offices, visible to staff and visitors. Staff and trustees are to be given a copy of the whole policy upon appointment/election and whenever the policy is modified.
- RACC - UK grievance and disciplinary procedures will be used to deal with any complaints about discrimination, harassment or bullying involving staff.
- Complaints from people using the organisation’s services will be dealt with through the complaint’s procedure for RACC - UK.
- RACC - UK seeks a broad and representative Board of Trustees.
- It is expected that when staff or Trustees represent RACC - UK on the committees of other agencies they will endeavour to ensure that equality and diversity principles and practices are adopted by those agencies.

EMPLOYMENT PRACTICES

- RACC - UK aims to promote equality and diversity as an employer and to ensure that no job applicant or employee receives less favourable treatment or is disadvantaged by conditions or requirements that cannot be shown to be justifiable within the context of the policy and the requirements of each specific post.
- RACC - UK regards discrimination, harassment, abuse, victimisation or bullying of staff, clients or of others during work as disciplinary offences that could be regarded as gross misconduct. Condoning such behaviour could also be treated as a disciplinary offence. As well as disciplining the perpetrator(s), we will give appropriate support to people who complain of harassment of themselves or others.
- Selection, recruitment, training, promotion and employment practices generally will be subject to regular review to ensure that they comply with the equality and diversity policy. Selection and recruitment procedures should be reviewed no less than annually to try and constantly improve equality and diversity practices.
- RACC - UK will attempt to accommodate staff requests to work flexibly, whether this involves part-time or some other working arrangement, for whatever reason, so long as agreement is consistent with the needs of the organisation. RACC - UK will also encourage initiatives designed to help staff who wish to return to work after a career break.
- RACC – UK’s terms and conditions of employment allow for paternity and partner leave in addition to standard maternity leave, in accordance with current



- legislation. Allowance is also made for compassionate and dependant's leave to deal with domestic emergencies.
- We recognise that organisations are obliged under the Disability Discrimination Act to make reasonable adjustments to accommodate disabled people and to enable them to do their job without unnecessary difficulty. We will make adjustments which are reasonable, whether or not we are obliged to do so by law, and whether or not a disabled applicant or employee is covered by the definition of disability under the Disability Discrimination Act (DDA).
- We accept our obligation not to discriminate against applicants and employees on the basis of their religion or belief. We will try to accommodate employees' religious beliefs by: -
 - Allowing time and if possible, a place for prayers during the working day and at the workplace.
 - Considering employees' dietary requirements in catering for staff and when providing facilities for staff to eat and store food.
 - Allowing staff of particular faiths to take their holidays for religious festivals and other religious observance.
 - Trying to arrange job interviews or other important work meetings at times when they do not clash with important religious festivals.
 - Not imposing a dress code with which people of a particular religion cannot comply.
- RACC - UK will not discriminate on grounds of age in recruitment, promotion, training, or the availability of benefits such as pension contributions or health insurance. RACC - UK will consider seriously any application to work beyond the retirement age of 67, whether flexibly or otherwise.
- RACC - UK will operate an annual staff appraisal system. Training or educational/professional development to enhance potential within the existing job, arising out of needs identified through appraisal or from other circumstances will, where appropriate or possible, be provided by RACC – UK. RACC - UK may, in certain circumstances, allow for paid or unpaid leave for training or educational purposes.
- RACC - UK will take whatever positive action is required where it can be shown that under-representation of any particular group has occurred in recruitment. Where appropriate and where legally permissible, employees from under-represented groups will be given training and encouragement in order to promote equality and diversity within RACC - UK.
- All training opportunities will be published widely to all appropriate employees and not in such a way as to exclude or disproportionately reduce the numbers of applicants from a particular group.



SERVICE DELIVERY

RACC - UK served by RACC - UK.

- RACC - UK will make public its commitment to combating discriminatory attitudes where these are encountered.
- RACC - UK will attempt to ensure that none of its policies discriminate directly or indirectly against any group or individual.
- RACC - UK will adopt a Complaints Procedure that will include its objectives with regard to equality and diversity in service delivery.
- RACC - UK will attempt to find ways of making our service accessible to everyone, including people for whom English is not a first language, people with visual or hearing impairments, and people who live in remote rural areas and/or who cannot easily travel.
- RACC - UK will take all reasonable steps to ensure that all its activities are carried out in premises which are accessible to people with mobility difficulties. In the event that the premises operated by RACC - UK are not accessible for particular individuals, RACC - UK will arrange alternative meeting places. This will include Board committee meetings.
- RACC - UK will be sensitive to the particular needs of service users by trying to provide for example, translations, childcare facilities run by vetted carers and, when providing food, having regard to religious and other dietary requirements.
- RACC - UK will operate a variety of means to allow people to contact staff and trustees.

MONITORING AND EVALUATION

- RACC - UK will regularly evaluate its services and the effectiveness of its equality and diversity policy, by a variety of means.
 - Monitoring may be carried out by RACC - UK to provide the data for this regular evaluation. For instance, RACC-UK may ask clients using our services, job applicants, volunteers and trustees for information about their ethnic origin, disability, marital status, age or other personal information. We will only do this for a specific defined purpose such as collecting statistical data for funders, for research or for our own monitoring to evaluate this policy's impact.
 - RACC - UK will be sensitive to groups and individuals and will have due regard for the principles of data protection when seeking information. Where sensitive information is gathered, those responding will be explicitly informed of the purpose and that they are liberty to withhold the information. All monitoring information will be securely stored, aggregated and anonymised.
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REVIEW OF THIS POLICY

RACC - UK's commitment to equality and diversity is an active one. This document should be reviewed and amended on a regular basis as part of this active commitment.

RACC - UK equality and diversity policy will be reviewed annually as an integral part of the business of the staff team, Board of Trustees and any sub-committee.

RACC - UK will also seek to keep abreast of new developments in Equality and Diversity legislation and practice and actively seek information on this issue.



HARASSMENT / DIGNITY AT WORK

RACC - UK objectives will be best served if staff work in harmony with each other and with those to whom they report. Each member of staff should respect other members of staff and realise that behaviour that they may find acceptable may not be so regarded by others.

Managers and supervisors shall act and react towards employees in a manner which respects their dignity. They shall work to ensure that those under their management and / or direction behave in a similarly respectful way in their relationships with each other.

Harassment

ACAS says: "The current definition of harassment as applied to age, sexual orientation, religion or belief and race and ethnic and national origin is unwanted conduct, whether or not intentional, that violates people's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment." In extreme or repeated situations, harassment may amount to bullying or abuse.

Harassment at work in any form is entirely unacceptable and each member of staff carries responsibility for their own behaviour under the policy.

Harassment can take many forms and may be directed in particular against women and ethnic minorities or towards people because of their age, religion, sexual orientation, physical or mental disability or some other characteristic. This list is neither definitive nor exhaustive.

To further ensure that individual employees are left in no doubt about the meaning of sexual, racial and other unlawful forms of harassment, definitions are provided below. These are not exhaustive definitions:

- Racial harassment is racial abuse, either physical or verbal, or racist statements comments or jokes which are uninvited and unwanted and tend to humiliate, intimidate and might threaten job security. Refer to Commission for Racial Equalities Code of Practice for Employment 2005
- The Sex Discrimination Act (SDA) was amended in 2005 to expressly outlaw a) harassment on the ground of sex ("sex-based harassment", such as harassment because a person is a woman in an all-male environment) and b) harassment of a sexual nature ("sexual harassment", e.g. unwanted sexual comments or touching). It also outlaw's harassment on grounds of a person's rejection of, or submission to, sex based or sexual harassment. It says that harassment is "conduct which has the purpose or effect of violating a person's dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment" for that person.

Sexual harassment includes repeated and unwanted verbal or sexual advances, sexually explicit or derogatory statements, sexually offensive material, or sexually discriminatory remarks. These may interfere with the employee's job



performance, undermine job security or create a threatening or intimidating work environment.

- Harassment on the grounds of disability, religion / belief and sexual orientation and age may include offensive jokes, personal remarks, intrusive questions, e-mails with offensive content, derogatory or discriminatory remarks or other content, verbal remarks that cause offence due to an individual's disability, religion / belief, sexual orientation or age.

RACC - UK will provide support for employees who allege harassment.

A proper investigation of complaints will take place using the RACC - UK disciplinary procedure.

Fair procedures will be followed and instigated promptly to minimise potential stress both for the alleged harasser and the complainant.

Process

Informal procedure

Wherever possible employees who believe that they have been the subject of harassment, should tell the person responsible that they find their behaviour offensive and ask them to stop. If the individual feels unable to do this themselves, they may ask a friend, their Union representative, their line manager or another person of their choice to do it for them.

If the alleged harassment continues, or the complainant feels unable to speak directly to the alleged harasser, it may be helpful to write to the person concerned clearly indicating what is considered to be unacceptable behaviour.

Formal procedure

If the behaviour continues (or the informal procedure seems inappropriate) the matter should be dealt with as a grievance. It should be reported in writing to the complainant's manager giving details of the incidents, when they occurred, any possible witnesses and any discussion or correspondence under the informal procedure. This complaint may be made through a friend, a Union representative or another person of choice. After receipt, the matter shall be brought to the attention of the alleged harasser's manager (if this is not also the complainant's manager) who shall carry out an investigation.

As an alternative to the above, which may be inappropriate, (e.g. because the alleged harasser is the complainant's manager), the complainant may raise the matter with the Organisation Director or the Chair of Trustees, who shall act as a confidential advisor. This advice may mean the employee needs to make a formal complaint to the manager of the person alleged to have carried out the harassment. The alleged harasser's manager shall then investigate.

The investigation shall be carried out under the terms of RACC - UK disciplinary procedures. In certain circumstances, the alleged harasser may be suspended without prejudice on full pay before, during or after the investigation.



During the investigation or resultant disciplinary hearing, the complainant and alleged harasser will have the right to be accompanied and/or represented by a person of their choice.

If the allegations are upheld disciplinary action including the possibility of dismissal will result.

If the outcome of the investigation and/or disciplinary hearing is that no formal disciplinary action is to be taken, no record of the complaint will appear on the alleged harasser's personal file.

The complainant will be informed that a disciplinary investigation has been held and may be told of the broad findings and outcomes of this investigation, provided this information does not breach the obligation of confidentiality to the alleged harasser. The complainant may lodge an appeal under the grievance procedure if they are not satisfied that the matter has been properly dealt with.

Victimisation

Employees will not be victimised in any way for complaining about discrimination or racial, sexual or other forms of harassment or for giving evidence about such a complaint.

Relevant Legislation

The Race Relations Act 1976

Racial and Religious Hatred Act 2006,

Race Relations Act 1976 (Amended) Regulations 2003

The Sex Discrimination Act 1975

Sex Discrimination Act 1975 - The Gender Reassignment Regulations 1999

Sex Discrimination Act 1975 – Discrimination on the Grounds of Sexuality 2000

Civil Partnership Act 2004

The Employment Equality (Religion or Belief) Regulations and the Employment Equality (Sexual Orientation) Regulations 2003

The Employment Equality (Age) Regulations 2006

The Disability Discrimination Act 1995 and 2004

Protection from Harassment Act 1997

Rehabilitation of Offenders Act 1974

Equality Act 2006

Protection from Harassment Act 1997

Crime and Disorder Act 1998

Related Policies

Employee Handbook

Recruitment & Selection Policy

Safeguarding Everyone

Whistleblowing

Disciplinary Rules and Procedures

Grievance Procedures

Absence Management Policy

Work-Life Balance Policy



Compliments and Complaints

Statement of Purpose

Rare Autoinflammatory Conditions Community - UK (also known as RACC – UK) is committed to providing the best possible service to both individuals and professionals in the agencies we work with.

The purpose of the Compliments and Complaints Policy is to ensure that compliments and complaints are properly administered, recorded and acknowledged and, where necessary, investigated. Also, that people lodging a complaint are treated in a fair, reasonable and consistent manner.

A Compliment is an expression of satisfaction with the services provided by Rare Autoinflammatory Conditions' Community- UK (RACC-UK) or its employees during their duties.

A Complaint is an expression of dissatisfaction, however made, about the standard of the service provided, actions or lack of action by Rare Autoinflammatory Conditions' Community- UK (RACC-UK) or its staff when acting during their duties.

Compliments and complaints about the service provision give an indication of how well RACC-UK is delivering services and where improvements can be made where appropriate.

Principles

- At RACC-UK we recognise that complaints may come from service users or from professionals working in external agencies.
- We acknowledge that there will be occasions when people are not happy with some aspect of our service.
- This policy exists to make it easier for people to tell us when they are dissatisfied, or indeed when they have any comment they wish to make about RACC-UK.
- All complaints are taken seriously. We aim to listen and to treat people with respect and consideration throughout the complaints process.
- Professionals in external agencies should use this procedure if they are unhappy with some aspect of our service.
- We also welcome positive feedback, either verbally or written.

What kind of circumstances may give rise to a complaint?

Such circumstances could include:

- You believe that you or a service user has been treated unfairly on any of the following grounds: age, marital and civil partnership status, maternity/paternity, race and ethnicity, gender or gender reassignment, sexual orientation, disability religion and belief, or for any similar reason.

You believe that we have failed to provide adequate information about RACC-UK or its services.

- You believe that we have failed to provide an appropriate service.

You believe that you have experienced an unreasonable delay in receiving a service.



You believe that a service provided to you or a service user has been inadequate.

- You believe that our staff have been rude or unhelpful to you or a service user.
- You disagree with a decision we have made or a policy that we operate.
- You believe that RACC-UK values have not been upheld.

Compliments Procedure

What should I do if I wish to compliment RACC-UK, or make a suggestion or comment about something?

RACC-UK welcomes all comments and suggestions and tries, wherever possible, to take account of these when developing our services. Please write to us, telephone or email, or use the service user satisfaction surveys to tell us about how we can improve our services. We would also like you to let us know of any positive experiences you have had.

Complaints Procedure

What should I do to complain informally?

You can make an informal complaint to any member of staff or to any manager. All workers will be pleased to tell you who is the most appropriate person to approach. This may be done by telephone or by letter or email.

We will listen to what you have to say, apologise whenever necessary, and try to agree a solution with you. We will try to deal with your complaint to your satisfaction immediately; however, there will be occasions when this may not be possible (for example during holiday periods).

If there is likely to be a delay in responding to your complaint you will be told that this is the case, and we will reply as quickly as possible by your preferred method. If you remain dissatisfied with us or with our response or feel that your complaint is of a more serious nature, then you should use the formal procedure outlined below.

What should I do to make a formal complaint?

You may use the formal complaints procedure at any time: You do not have to complain informally first if you believe that your complaint is too serious for that approach.

Attached to this policy you will find a basic form which you may use to make your complaint. If you would prefer, you may write a letter instead. However, you should note that a formal complaint cannot be progressed verbally. This applies to both service user complaints as well as complaints from external agencies.

If the complaint is about something that is either serious or urgent, you may telephone a manager, in the first instance, but this must be followed up in writing. Service users are encouraged to get help with writing their complaint if they need it. Such assistance could be given by a friend or family member, a Citizens Advice Bureau or Advocacy group or a similar organisation.

The complaint needs to be sent to Rare Autoinflammatory Conditions' Community- UK, Flat 1, 24 Swan Street, Eynsham, OX29 4HU, marking the envelope clearly "Strictly Private & Confidential: For the attention of the Director". If your complaint involves the Director, you should address it to the Chair of Trustees at the same address.



What will happen after I complain?

RACC-UK will acknowledge receipt of your formal complaint within 5 working days. This will usually be done by letter, so it is important that you provide us with your correct postal address. This letter will also tell you what steps will be taken to investigate your complaint.

We will usually want to speak to you personally. Alternatively, we may ask you to meet with us to discuss the problem (in which case you are welcome to be accompanied by a person of your choice from outside RACC-UK if you are a service user).

We may allocate responsibility for this meeting and for investigating the complaint to the appropriate manager.

If your complaint is about a member of staff, it will be passed immediately to the appropriate manager, who will write to you to tell you that this has been done and to explain that our internal inquiry process has begun.

We aim to resolve all complaints quickly, and to keep you informed throughout the process. You will receive a full written response, usually within 28 days. If there is likely to be any further delay, you will be informed. This letter will include information on what to do if you are still dissatisfied.

Will my complaint be confidential?

Your complaint may be seen by managers and/or Trustees of RACC-UK as part of the investigation process, but we will make every effort to safeguard your privacy. Your complaint will not become “public knowledge” unless you so wish. You should be aware, however, that if your complaint were specifically about a member of staff or a Trustee of the organisation, it would be necessary for that person to be told that a complaint has been lodged against them, to allow the investigation to proceed. They may also need to know the substance of the complaint.

What if I am still unhappy – can I appeal?

You can appeal if you are dissatisfied about the decision made; about the way your complaint has been handled; or about any aspect of the formal procedure outlined above, including the final response.

You cannot go directly to the appeal stage unless you have used the formal procedure. If you wish to appeal, you should complete the form which will be attached to the letter sent to you following completion of the formal procedure. Again, service users can obtain assistance with this, as explained above. You should post or deliver the appeal form to Rare Autoinflammatory Conditions' Community- UK, Flat 1, 24 Swan Street, Eynsham, OX29 4HU, marking the envelope “Strictly Private and Confidential: For the attention of the Trustees”.

What will happen if I appeal?

You will receive written acknowledgement of your appeal, usually within 10 working days, along with information as to when and how the appeal will be handled. A panel (normally consisting of 3 Trustees) will be formed to consider your appeal. You may be invited to attend this meeting. Service users have a right to bring a person of their choice from outside RACC-UK, if they so wish, or make written comments. Your appeal and the original complaint will be considered in detail, and you will receive a written response within 14 working days of the hearing. RACC-UK will make every effort to comply with the decision or recommendations of the appeal panel.



What if I am still dissatisfied following an appeal?

The appeal stage is the final internal one as far as RACC-UK is concerned.

Useful Information

Rare Autoinflammatory Conditions Community - UK (RACC - UK)

Flat 1, 24 Swan Street, Eynsham, West Oxfordshire, OX29 4HU

Registered Charity in England & Wales: 1184846

Tel: 07377091552

Email: frankie@raccuk.com



Complaints Form

Name

Address

Mobile number

Land line number

E-mail address

Agency (if from an external agency)

Complaint:



Printable Copy

Signature

Date



Compliment Form

Name
Address

Mobile number
Land line number
E-mail address
Agency (if from an external agency)

Compliment:

Signature

Date



Printable Copy



EXPENSES

REIMBURSEMENT OF EXPENSES

RACC - UK wants to ensure that staff, trustees and volunteers are not out-of-pocket for the work they do for us, while also looking to get the best use of limited funds.

HM Revenue & Customs expenses and benefits rules recognise that reimbursement of standard business expenses (such as travel) are not taxable. RACC - UK's policy is guided by these rules and we do not pay expenses that will give rise to tax or National Insurance.

In order to comply, any amounts claimed must be for actual costs incurred by staff 'wholly, exclusively and necessarily in the performance of the duties of their employment', and that adequate records are submitted with each claim.

General rules

- Expenditure incurred by staff, trustees or volunteers of RACC - UK should be necessary to achieve our goals and represent good value to the organisations that fund us.
- Each staff member is responsible for familiarising themselves with these rules and understanding the limits of their authority, as [ORG] may not reimburse any expenses considered unreasonable or outside this guidance.
- All expenses should be itemised, with supporting receipts attached on RACC - UK's claim form.
- Expenses under £[x] that have no supporting receipt may be accepted. Expenses over £[x] with no supporting receipt require a signed letter by the staff member explaining the purpose of the expense and the reason why a receipt is not provided. RACC - UK may decline to reimburse an expense claimed with no supporting receipt.

Eligible expenses

The specific rules for eligible expenses that may be claimed by staff are listed and described below:

- Public transport fares
- Use of personal vehicles
- Taxis

Public transport fares

Expenses associated with public transport such as trains, buses, underground and short haul flights within Europe are eligible for expenses claims.

Staff are expected to make use of any special reduced fare arrangements, such as cheap day and period returns, where possible.

Use of personal vehicle

Staff may use their own vehicles for business travel if they wish, at their own risk, when [x]. Where practicable staff should travel together to minimise costs. Any member of staff using his or her vehicle for business purposes must have [a full UK driving licence], and the vehicle must have an in-date MOT certificate, be fully taxed vehicle and insured for business use. A mileage allowance may be claimed by staff using their own vehicle for business travel. Current mileage allowance rates are as follows:

- Car or van
- [x]p per mile (up to [10,000 miles, 25p] thereafter)
- Motorcycle
- [x]p per mile
- Bicycle
- [x]p per mile
- Passenger on business travel (car or van only)
- [x]p per mile (paid to driver)

Parking fees, congestion charges and toll charges will be met by RACC - UK, but not parking fines.

Taxis

The cost of travel by taxi will be reimbursed in the following circumstances:

- There is no reasonable or practical alternative to getting to the destination.
- The staff member has been required to work so early or late, that public transport is not reliably available, or the individual's safety is compromised.
- A 'heavy load' is being transported, which would be unreasonable to carry on public transport.
- The individual has a disability such that public transport is not appropriate.

The reason why the staff member has chosen to travel by taxi must be described in the expenses claim form, and a receipt provided showing the date, place of departure and destination.

Making claims

- All claims for travel and subsistence expenses, from trustees, staff and volunteers, must be completed on the appropriate form.
- Claims by staff and volunteers should be authorised by the appropriate line manager, or, for the [chief executive] by the [chair].
- Claims by trustees should be authorised by [x].
- Claims should be submitted [monthly] or, may be submitted more frequently if the total claim has reached £[x].



HANDLING OF DBS CERTIFICATE INFORMATION

1. Introduction

- This guidance is regarding the secure storage, handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates and certificate information.
- The code of practice states that all registered bodies must have a written policy on the correct handling and safekeeping of DBS certificate information.
- It also obliges registered bodies to make sure that a body or individual, on whose behalf they are countersigning applications, has a written policy.
- This policy has been used and adapted from the Gov UK website to help the organisation meet its requirements.

2. Rare Autoinflammatory Conditions Community – UK policy statement

• 2.1 General principles

- As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Rare Autoinflammatory Conditions Community - UK complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.
- It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

• 2.2 Storage and access

- Certificate information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

• 2.3 Handling

- In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

To note: organisations which are inspected by the Care Quality Commission (CQC) or Ofsted, and those establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW) may be legally entitled to retain the certificate for the purposes of inspection.

In addition, organisations that require retention of certificates to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits may be legally entitled to retain the certificate. This practice will need to be compliant with the Data Protection Act, Human Rights Act, General Data Protection Regulation (GDPR), and incorporated within the individual organisation's policy on the correct handling and safekeeping of DBS certificate information.



2.4 Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

2.5 Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

2.6 Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

2.7 Umbrella Bodies

Rare Autoinflammatory Conditions Community - UK does not act as a registered umbrella body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations.

Rare Autoinflammatory Conditions Community - UK may use any registered umbrella body which countersigns applications and receives certificate information on its behalf.

3. DBS logo

The DBS logo is protected by crown copyright, the copying and use of the DBS logo is not permitted without prior approval of the DBS.

References

1. https://assets.publishing.service.gov.uk/media/5a817cbde5274a2e8ab5441d/Code_of_Practice_for_Disclosure_and_Barring_Service_Nov_15.pdf
2. https://assets.publishing.service.gov.uk/media/5a79fec840f0b66eab998fa0/Continuation_sheet_v4.pdf
3. <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance/dbs-paper-referral-form-guidance>
4. <https://www.gov.uk/government/publications/basic-dbs-check-privacy-policy/basic-dbs-check-privacy-policy>
5. <https://www.gov.uk/government/publications/consent-privacy-policy/consent-policy>
6. <https://www.gov.uk/government/publications/barring-privacy-policy/barring-privacy-policy>

RECRUITMENT OF EX-OFFENDERS.

1. Introduction

The [code of practice](#) published under section 122 of the Police Act 1997 advises that it is a requirement that all registered bodies must treat DBS applicants who have a criminal record fairly and not discriminate automatically because of a conviction or other information revealed.

The code also obliges registered bodies to have a written policy on the recruitment of ex-offenders; a copy of which can be given to DBS applicants at the outset of the recruitment process.

This policy statement can also be included within your organisation's equal opportunities policy.

2. Further information about conviction information

On the 29 May 2013, legislation came into force that allows certain old and minor cautions and convictions to no longer be subject to disclosure.

In addition, employers will no longer be able to take an individual's old and minor cautions and convictions into account when making decisions

all cautions and convictions for specified serious violent and sexual offences, and other specified offences of relevance for posts concerned with safeguarding children and vulnerable adults, will remain subject to disclosure. In addition, all convictions resulting in a custodial sentence, whether or not suspended, will remain subject to disclosure, as will all convictions where an individual has more than one conviction recorded you can direct applicants to the guidance and criteria which explains the [filtering of old and minor cautions and convictions](#) which are now 'protected' so not subject to disclosure to employers

3. Policy on the recruitment of ex-offenders[1]

- as an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), RACC - UK complies fully with the [code of practice](#) and undertakes to treat all applicants for positions fairly
- RACC - UK undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed
- RACC - UK can only ask an individual to provide details of convictions and cautions that RACC - UK are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
- RACC - UK can only ask an individual about convictions and cautions that are not protected
- RACC - UK is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background

- RACC - UK has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process
- RACC - UK actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records
- RACC - UK select all candidates for interview based on their skills, qualifications and experience
- an application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position
- RACC - UK ensures that all those in RACC - UK who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences
- RACC - UK also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974
- at interview, or in a separate discussion, RACC - UK ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment
- RACC - UK makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request
- RACC - UK undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

References:

1. <https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide>
2. <https://www.gov.uk/government/publications/filtering-rules-for-criminal-record-check-certificates/new-filtering-rules-for-dbs-certificates-from-28-november-2020-onwards>
3. <https://www.gov.uk/government/publications/unlock-opportunity-employer-information-pack-and-case-studies/employing-prisoners-and-ex-offenders>
4. [https://assets.publishing.service.gov.uk/media/653f7e52d10f3500139a6b20/30102023_Guidance_o
n the Rehabilitation of Offenders Act 1974 and The Exceptions Order 1975.pdf](https://assets.publishing.service.gov.uk/media/653f7e52d10f3500139a6b20/30102023_Guidance_on_the_Rehabilitation_of_Offenders_Act_1974_and_The_Exceptions_Order_1975.pdf)
5. <https://www.gov.uk/guidance/rehabilitation-periods>

Contact Information



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THANK YOU

*THANK YOU FOR THE SUPPORT
AND TRUST YOU HAVE GIVEN US*

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