Therapy Dogs Nationwide Policies V.2.2

Contents

1. Document Overview: 6
2. Version Control: 6
3. Acceptance or Refusal of Donation Policy 7
   - 3.1. Ethical and Responsible Fundraising 7
   - 3.2. Legal Obligations to Refuse or Return Donations 7
   - 3.3. Acceptance of Donations 7
   - 3.4. Crypto-assets 7
   - 3.5. Anonymous Donations 8
   - 3.6. Refusal of Donations 8
   - 3.7. Donor Recognition & Avoiding Private Benefit 8
   - 3.8. Charity Commission Guidance and Approval 8
4. Anti Money Laundering Policy 9
   - 4.1. Roles and Responsibilities 9
   - 4.2. Applicability 9
   - 4.3. Due Diligence and Monitoring 9
   - 4.4. Training and Awareness 10
   - 4.5. Monitoring and Internal Controls 10
   - 4.6. Sanctions Compliance 10
   - 4.7. Reporting Suspicious Activity 10
   - 4.8. Record Keeping 11
5. Bullying and Harassment Policy 12
   - 5.1. Scope and Applicability 12
   - 5.2. Definitions: Bullying and Harassment 12
   - 5.3. Legal Framework 12
   - 5.4. Trustee Responsibilities 13
   - 5.5. Reporting Concerns 13
   - 5.6. How Concerns Will Be Handled 13
   - 5.7. Serious Incidents and Reporting to the Charity Commission 13
   - 5.8. Support for Those Affected 13
   - 5.9. Consequences of Misconduct 14
6. Complaints Policy 14

6.1. Key Principles 14
6.2. Clear roles: 14
6.3. Definitions 14
6.4. Raising an Informal Concern 14
6.5. Making a Formal Complaint 15
6.6. How TDN Will Respond 15
6.7. Appeals Process 15
6.8. Anonymous Complaints 16
7. Data Protection Policy 17
7.1. Roles and Responsibilities 17
7.2. What Counts as Personal Data? 17
7.3. How TDN Uses Personal Data 17
7.4. Data Protection Principles (Plain English) 17
7.5. Keeping Data Safe 18
7.6. Individual Rights 18
7.7. Imagery and Video 18
7.8. Children and People Who Cannot Give Consent 18
7.9. Safeguarding and Risk 19
7.10. Data Breaches 19
7.11. Fundraising and Communications 19
7.12. International Data Transfers 19
7.13. Artificial Intelligence 19
7.14. Data Protection Complaints 19
8. Due Diligence Policy 20
8.1. Roles and Responsibilities 20
8.2. What "Due Diligence" Means at TDN 20
8.3. When We Carry Out Due Diligence 20
8.4. Proportionate Risk Assessment 21
8.5. Basic Checks for Organisations 21
8.6. Additional Checks (Used Only When Needed) 21
8.7. Due Diligence for Donors 22
8.8. Individuals (Higher-Risk Situations Only) 22
8.9. Data Protection and Privacy 22
8.10. Reputational Risk 22

8.11. Ability to Deliver 22
8.12. Contracts and Agreements 22
8.13. Artificial Intelligence (AI) 23
8.14. Escalation and Decision-Making 23
9. Fundraising Policy 24
9.1. Roles and Responsibilities 24
9.2. Respectful Conduct, Bullying and Abuse 25
9.3. Working With Vulnerable Individuals 25
9.4. Commercial Partnerships 25
9.5. Donations 25
9.6. Safeguarding and Risk Management 25
9.7. Artificial Intelligence 26
9.8. Complaints and Feedback 26
10. Grievance Policy 27
10.1. Who This Policy Applies To 27
10.2. What Is a Grievance? 27
10.3. Principles We Follow 27
10.4. Safeguarding, Safety, and Data Protection 27
10.5. Informal Resolution 28
10.6. Formal Grievance Procedure 28
10.7. Appeal Process 28
10.8. Confidentiality 29
10.9. Protection from Retaliation 29
10.10. Malicious or Bad-Faith Complaints 29
10.11. Record Keeping 29
11. Recruitment Policy 30
11.1. Governance and Responsibilities 30
11.2. Promoting Volunteer Opportunities 30
11.3. Recruitment Process 30
11.4. Selection Criteria 31
11.5. Ongoing Support 31
11.6. Accessibility and Inclusion 31
11.7. Exceptions and Role Suitability 31
12. Reserves Policy 32

12.1. What We Mean by Reserves 32
12.2. How We Set Our Reserves Policy 32
12.3. Target Level of Reserves 32
12.4. Monitoring and Reviewing Reserves 32
12.5. Annual Reporting 32
12.6. Investing Reserves 33
12.7. Safeguarding, Risk, and Data Protection Considerations 33
12.8. Roles and Responsibilities 33
13. Safeguarding Policy 34
13.1. Purpose of This Policy 34
13.2. Who This Policy Applies To 34
13.3. Our Safeguarding Principles 34
13.4. Definitions Volunteers May Need 34
13.5. Roles and Responsibilities 34
13.6. Recognising Abuse 35
13.7. Reporting Safeguarding Concerns 35
13.8. Risk Management for Visits 36
13.9. Data Protection and Privacy 36
13.10. Online Safety 36
13.11. Working With Other Organisations 36
13.12. Fundraising Safeguarding 36
13.13. Appendix A – Signs of Abuse 36
14. Social Media Policy 38
14.1. Key Principles 38
14.2. Legal Responsibilities 38
14.3. Who Speaks for TDN 38
14.4. Using Social Media Safely and Responsibly 38
14.5. Responding to Others Online 39
14.6. Moderation of TDN's Social Media Channels 39
14.7. Take-Down Process 40
15. Volunteer Fundraising Policy 41
15.1. Roles and Responsibilities 41
15.2. Planning Your Fundraising Activity 41
15.3. Handling Money and Donations 41

15.4. Data Protection and Privacy 42
15.5. Photos, Videos, and Use of Images....42
15.6. Behaviour and Conduct During Fundraising 42
15.7. Safeguarding Considerations 42
15.8. Support From TDN....42
16. Volunteer Policy 44
16.1. How TDN Is Organised 44
16.2. Volunteering With TDN....44
16.3. Safeguarding and Safety 45
16.4. Data Protection (GDPR) 45
16.5. Recruitment and Induction....45
16.6. Insurance 46
16.7. Equal Opportunities and Inclusion 46
16.8. If There Is a Concern About a Volunteer's Conduct....46
17. Whistleblowing Policy 47
17.1. What Is Whistleblowing?....47
17.2. What Is Not Whistleblowing? 47
17.3. Who Can Raise a Whistleblowing Concern?....47
17.4. Safeguarding and Data Protection 47
17.5. How to Raise a Concern....48
17.6. Confidentiality and Anonymity 48
17.7. How TDN Will Respond....48
17.8. Protection for Whistleblowers....48
17.9. Support and External Advice 49

1. Document Overview:

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2. Version Control:

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2.0	Trustee Board	May 2026	Policies updated and combined into one document	April 2027
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2.2	Trustee Board: • Mary Oliver • Emma Quartly-Karniewicz • Michael Wood Nehal Vasani	October 2026	Updated charities registered addressed	April 2027

3. Acceptance or Refusal of Donation Policy

As a registered charity in England and Wales (Charity No. 1167622), Therapy Dogs Nationwide (TDN) complies with all relevant UK laws and regulatory guidance, including that issued by the Charity Commission, HMRC, and the Fundraising Regulator. In line with the Fundraising Code (section 2.3.1), we would only refuse or return a donation in exceptional circumstances. Where such a decision is considered, trustees will document the circumstances, rationale, and any advice sought.

3.1. Ethical and Responsible Fundraising

When soliciting or receiving funds, TDN will:

- Never knowingly mislead donors or provide false information.
- Never place undue pressure on a donor, particularly where they may be vulnerable.
- Ensure all fundraising activity reflects our values of kindness, integrity, and public benefit.

If we suspect a donation may come from an illegal or suspicious source, we will not return it or contact the donor. Instead, we will report concerns to the appropriate authorities, including the Charity Commission, Action Fraud, or the police, in line with regulatory guidance.

3.2. Legal Obligations to Refuse or Return Donations

We recognise our legal duty to refuse or return a donation where:

- The donor lacks the mental capacity to make the decision to donate.
- The donor does not legally own the property or funds being donated.
- The terms of the donation require it to be returned in certain circumstances.
- Accepting the donation would place the charity in breach of the law.

3.3. Acceptance of Donations

TDN accepts donations on a good-faith basis. We operate on the presumption that a donation is acceptable unless there is evidence to the contrary. We apply proportionate, risk-based due diligence appropriate to the size and nature of our charity.

When deciding whether to accept or decline a donation, trustees will balance:

- The benefit to our beneficiaries of accepting the funds.
- The potential risks of accepting a donation that may be inappropriate, including:
    - harm to beneficiaries or volunteers
    - reputational damage
    - loss of public trust
    - legal or regulatory risk

Assessing Vulnerability

In line with the Fundraising Code, we consider whether a donor may be vulnerable due to:

- A physical or mental-health condition
- Learning difficulties or cognitive impairment
- Times of stress, anxiety, or bereavement
- Limited English language skills
- Influence of alcohol or drugs
- Age or financial vulnerability

We will take reasonable steps to avoid seeking regular donations (e.g., direct debits) from anyone under 18.

3.4. Crypto-assets

Given the nature and scale of TDN's operations, donations of crypto-assets will only be accepted following a specific trustee decision. Trustees will assess:

- Opportunities and potential benefits
- Financial, regulatory, and operational risks

- Whether the charity has (or can obtain) the necessary expertise

If accepted, appropriate controls and ongoing risk management will be implemented.

3.5. Anonymous Donations

TDN may receive anonymous donations through collection tins, online platforms, or other channels. Anonymous giving is permissible provided we remain alert to suspicious circumstances and apply appropriate safeguards.

Trustees will take reasonable steps to understand the source of significant or unusual donations. Indicators of concern may include:

- Large or unexpected sums
- Donations in cash or from overseas
- Requests to forward funds to third parties
- Attempts to donate funds in advance of receiving cash

Suspicious donations may be reported to the Charity Commission as a Serious Incident.

3.6. Refusal of Donations

TDN will not accept a donation where there are reasonable grounds to believe:

- The donation would fund activities outside our charitable objects.
- The donor's activities or public stance are fundamentally incompatible with our values.
- The donation may be linked to fraud, money laundering, tax evasion, or other illegal activity.
- Acceptance would create improper private benefit, such as an obligation to purchase goods or services from a specific company.
- Acceptance may expose the charity to a legal claim or significant risk.
- Conditions attached to the donation:
    - compromise our independence
    - are so onerous that they undermine our effectiveness
    - restrict beneficiaries in a way that undermines our public benefit duty
- The cost of accepting or administering the donation would exceed its value.

3.7. Donor Recognition & Avoiding Private Benefit

TDN welcomes donations from individuals, companies, and organisations. However, we will not accept donations where the primary purpose appears to be commercial gain or "ethics-washing".

Any recognition offered to donors will be proportionate and consistent with what is offered to others. We will ensure that any private benefit to a donor is incidental and compliant with charity law.

3.8. Charity Commission Guidance and Approval

For complex or high-risk decisions, trustees may seek formal advice from the Charity Commission.

Where trustees believe they have a moral obligation to refuse or return funds, they will follow the ex-gratia process and seek the Commission's consent, rather than relying solely on general powers to return donations.

4. Anti Money Laundering Policy

Therapy Dogs Nationwide (TDN) is committed to preventing money laundering, terrorist financing, and the misuse of charitable funds. Although TDN is a low-risk charity in terms of financial activity, we recognise our duty to remain vigilant and to comply with all relevant UK legislation and regulatory guidance, including:

- The Proceeds of Crime Act 2002
- The Terrorism Act 2000
- The Money Laundering Regulations (where applicable)
- Charity Commission guidance (*Protecting Charities from Harm*, *Know Your Donor*)
- OFSI sanctions regulations

We maintain proportionate internal controls, due diligence processes, and monitoring systems to minimise the risk of the charity being used for illegal purposes.

This policy provides a clear framework for how TDN identifies, assesses, and manages the risk of money laundering. It ensures that trustees, staff, and volunteers understand:

- The risks relevant to a UK-based, volunteer-led charity
- Their responsibilities in identifying suspicious activity
- How to escalate concerns appropriately

The policy will be reviewed regularly to ensure it remains effective and proportionate to TDN's operations.

4.1. Roles and Responsibilities

TDN has appointed a **Nominated Officer (Money Laundering Reporting Officer – MLRO)** responsible for:

- Overseeing the charity's AML controls
- Ensuring due diligence processes are followed
- Receiving and assessing internal reports of suspicious activity
- Reporting concerns to the relevant authorities (e.g., Action Fraud, police, Charity Commission)
- **Trustees, Volunteers, and Staff**

All trustees, volunteers, employees, contractors, and representatives must:

- Be aware of the risks of money laundering
- Follow this policy and related procedures
- Report any concerns immediately to the Nominated Officer
- Not alert a donor or third party if suspicious activity is suspected ("tipping off" is a criminal offence)

4.2. Applicability

This policy applies to:

- Trustees
- Employees
- All volunteers
- Contractors and third-party representatives
- Anyone acting on behalf of Therapy Dogs Nationwide

Its principles should be reflected in related policies, agreements, and operational procedures.

4.3. Due Diligence and Monitoring

TDN applies **risk-based due diligence** appropriate to the size and nature of the charity. This includes:

- **Identifying and Verifying Donors or Partners**

For higher-risk or unusual donations, we may:

- Request identification or verification documents
- Seek information about the source of funds
- Conduct basic checks (e.g., open-source searches)

- Assess whether the donation is consistent with the donor's profile

Routine, low-value donations (e.g., collection tins, online giving) do not require enhanced checks unless suspicious.

- **Risk Assessment**

We consider factors such as:

- Unusually large or unexpected donations
- Donations from overseas or in cash
- Requests to pass funds to third parties
- Conditions attached to donations
- Donors who cannot clearly explain the source of funds
- **Record Keeping**

We maintain records of:

- Due diligence checks
- Risk assessments
- Any concerns raised
- Decisions made and the rationale
- Training provided

Records are kept securely and in line with data protection requirements.

4.4. Training and Awareness

TDN will ensure that trustees, staff, and volunteers receive proportionate training so they understand:

- What money laundering is
- How charities can be misused
- Red flags to look out for
- How to report concerns

Training will be refreshed periodically and adapted as risks evolve.

4.5. Monitoring and Internal Controls

We have internal controls to ensure this policy is implemented effectively, including:

- Trustee oversight of financial activity
- Segregation of duties where possible
- Regular review of unusual or high-value donations
- Clear reporting lines for concerns

These controls are proportionate to TDN's size and operational model.

4.6. Sanctions Compliance

TDN complies with UK financial sanctions administered by the **Office of Financial Sanctions Implementation (OFSI)**.

It is illegal to:

- Receive money, goods, or economic resources from a sanctioned individual or organisation
- Provide money, goods, or economic resources to a sanctioned individual or organisation

If there is any indication that a donor, partner, or organisation may be subject to sanctions, the Nominated Officer will:

1. Consult OFSI's published guidance and sanctions list
2. Seek advice from OFSI where necessary
3. Suspend any transaction until a clear determination is made

In rare cases, a licence may be required from OFSI before proceeding.

4.7. Reporting Suspicious Activity

If any trustee, volunteer, or staff member identifies suspicious behaviour or a potential money-laundering risk, they must:

- Report it immediately to the Nominated Officer

- Not alert the donor or third party
- Provide all relevant information for assessment

The Nominated Officer will determine whether to escalate the matter to:

- Action Fraud
- The police
- The Charity Commission (as a Serious Incident)
- OFSI (for sanctions concerns)

4.8. Record Keeping

TDN will retain records of:

- Due diligence checks
- Risk assessments
- Suspicious activity reports
- Training records
- Policies and procedures

Records will be kept for the period required by law and Charity Commission guidance.

5. Bullying and Harassment Policy

The purpose of this policy is to protect everyone involved with Therapy Dogs Nationwide (TDN) from harassment, bullying, intimidation or inappropriate behaviour, and to ensure that any concerns raised are handled promptly, proportionately, sensitively and, wherever possible, confidentially.

TDN is committed to fostering a culture of kindness, respect and safety for our volunteers, trustees, beneficiaries, partners and members of the public.

5.1. Scope and Applicability

This policy applies to all individuals working on behalf of TDN, including:

- Trustees
- Volunteers (including visiting teams, assessors, coordinators and support volunteers)
- Contractors or individuals representing TDN in any capacity

The policy must be shared with all new volunteers and trustees as part of their induction and made available to anyone who wishes to read it.

We expect partner organisations (e.g., schools, hospitals, care homes, workplaces) to uphold similarly robust standards. TDN will not tolerate any volunteer, trustee or representative being bullied or harassed by a partner, beneficiary or member of the public. Where this occurs, TDN will take appropriate action, which may include withdrawing visits or escalating concerns.

5.2. Definitions: Bullying and Harassment

Bullying and harassment is behaviour that makes someone feel intimidated, degraded, humiliated or offended. Harassment is unlawful under the Equality Act 2010 when it relates to a protected characteristic.

Examples of bullying or harassing behaviour include:

- Spreading malicious rumours
- Unfair or unequal treatment
- Persistent criticism, undermining or belittling someone
- Excluding someone deliberately
- Denying reasonable training, support or volunteering opportunities
- Offensive jokes, comments or gestures
- Unwanted contact or communication

Bullying and harassment can occur:

- Face-to-face
- By phone
- In writing
- By email, text or social media

Important: Reasonable and proportionate feedback, performance management, safeguarding discussions or decisions made in line with TDN policies do not constitute bullying.

5.3. Legal Framework

Bullying itself is not a specific criminal or civil offence. However, harassment is unlawful under the Equality Act 2010 when related to:

- Age
- Sex
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity

- Race
- Religion or belief
- Sexual orientation

Other behaviours may also constitute criminal offences (e.g., threats, stalking, hate crime).

5.4. Trustee Responsibilities

The Board of Trustees recognises that:

- There is no place for bullying or harassment within TDN or by anyone acting on its behalf.
- Trustees must lead by example, promoting a culture of openness, respect and kindness.
- Trustees are responsible for ensuring TDN has clear, accessible policies and that concerns are handled promptly, sensitively and lawfully.
- Trustees must ensure appropriate processes exist to hear, investigate and address concerns, including those raised about trustees themselves.
- Trustees must ensure volunteers feel safe and supported in raising concerns without fear of retaliation.

5.5. Reporting Concerns

Anyone who experiences or witnesses bullying or harassment is encouraged to raise their concerns as soon as possible. Concerns can be raised with:

- A Trustee
- The Chair of Trustees
- A coordinator or ATS (where appropriate)

Anonymous concerns will be recorded and reviewed. However:

- Anonymous reports can limit our ability to investigate
- They may occasionally be malicious
- Individuals are therefore encouraged to provide contact details so we can follow up and provide an outcome

TDN will protect individuals from retaliation for raising concerns in good faith.

5.6. How Concerns Will Be Handled

When a concern is raised, TDN will:

- Acknowledge the concern promptly
- Assess the nature and seriousness of the allegation
- Decide whether informal resolution, mediation or a formal investigation is appropriate
- Ensure any investigation is fair, proportionate and respectful
- Keep the individual informed of progress where possible
- Maintain confidentiality except where disclosure is required for safeguarding, legal or investigative reasons

Where concerns relate to safeguarding, TDN's Safeguarding Policy will take precedence.

5.7. Serious Incidents and Reporting to the Charity Commission

TDN will report serious actual or alleged incidents of bullying or harassment to the Charity Commission in line with the Commission's Serious Incident Reporting guidance.

Volunteers and trustees may also make reports directly to the Charity Commission if they believe the charity is failing to act appropriately.

5.8. Support for Those Affected

TDN is committed to supporting anyone affected by bullying or harassment. This may include:

- Signposting to external support services
- Adjustments to volunteering arrangements
- Mediation (where appropriate)
- Pastoral support from a trustee or coordinator

5.9. Consequences of Misconduct

Where bullying or harassment is found to have occurred, TDN may take appropriate action, including:

- Withdrawal of volunteering duties
- Removal from the volunteer register
- Trustee disciplinary action
- Reporting to partner organisations
- Reporting to statutory agencies where required

Malicious or knowingly false allegations may also result in action.

6. Complaints Policy

Therapy Dogs Nationwide aims to provide safe, positive and professional experiences for everyone we meet. Sometimes things may go wrong, or someone may feel unhappy about an interaction, decision or situation. This policy explains how concerns and complaints can be raised, how we will respond, and what volunteers, coordinators and trustees should do.

This policy is written in plain English and is suitable for volunteers, members of the public, partner organisations and anyone involved in TDN activities. The complaints policy below may also be used in respect of a data protection complaint.

6.1. Key Principles

- **Kindness and respect:** Everyone raising a concern will be treated with courtesy and understanding.
- **Safety first:** If anyone is at immediate risk of harm, emergency services should be contacted straight away.
- **Fair process:** Concerns will be listened to, recorded and considered carefully.
- **Proportionate response:** We will take reasonable steps to resolve issues and learn from them.

6.2. Clear roles:

- **Trustees** oversee the complaints process and make final decisions.
- **Operational volunteers** (e.g., regional coordinators, visit leads) help address concerns promptly and pass information to trustees.
- **Visiting volunteers** support by reporting concerns and providing information when needed.

6.3. Definitions

- **Concern:** A minor issue that can usually be resolved quickly through conversation.
- **Complaint:** A more formal expression of dissatisfaction requiring investigation and a written response.
- **Safeguarding concern:** Any worry relating to the safety or wellbeing of a child or adult at risk. These must be reported immediately to the Safeguarding Lead.
- **Anonymous complaint:** A complaint where the person does not provide their name or contact details.

6.4. Raising an Informal Concern

Anyone (visitor, staff member at a venue, volunteer, member of the public) can raise a concern with the TDN volunteer present or the relevant regional coordinator.

What volunteers should do If you receive a concern:

- **Listen carefully and acknowledge the issue.**
- **Try to resolve it kindly and promptly**, if appropriate and safe.
- **Make a brief record** of the following and pass it to your regional coordinator or directly to trustees if needed:
    - Name and contact details of the person raising the concern (if they are willing to share them).
    - What happened, including date, time and location.
    - Who was involved or present.
    - What the person felt was unsatisfactory.

- Any steps taken at the time.

- **Explain that the information will be shared with TDN trustees**, who oversee complaints and safeguarding.

If the concern relates to **safeguarding**, follow TDN's Safeguarding Policy immediately.

6.5. Making a Formal Complaint

If someone wishes to make a formal complaint, they may do so at any time.
Complaints can be sent to:
Email: trustees@tdn.org.uk or help@tdn.org.uk
Post: Therapy Dogs Nationwide, 66 Paul Street, London, EC2A 4NA
Please mark correspondence **"Private and Confidential – Complaint"**.
We will provide a copy of this policy on request.
Information that helps us investigate
Complainants are encouraged to include:

- Name, organisation (if relevant), and contact details.
  - If they prefer not to be contacted in a particular way, they can tell us.
  - A clear description of what happened, including date, time, location and who was present.
  - Why they felt the situation was unsatisfactory.
  - What they feel would be a reasonable resolution.
  - Providing full information helps us respond more quickly.
  - A data subject may raise a complaint or concern about the way we handle personal data and this will mean that the complaint process below needs to be used.

6.6. How TDN Will Respond

- **Acknowledgement**

We aim to acknowledge receipt of a complaint within **7 working days, and in respect of data protection complaints, no later than 30 calendar days of the date the data protection complaint was received**.

- **Investigation**

A trustee will review the complaint. They may:
Contact the complainant for clarification.
Speak with volunteers or others involved.
Seek specialist advice if needed (e.g., safeguarding, insurance, data protection legal advice).

- **Response**

We aim to provide a full response within **14 working days**. If more time is needed, we will send a holding update explaining why and when a full response is expected.
Our response will outline:

- What we have found.
- Any actions taken or planned.
- Any limitations on what we can share due to **data protection** or confidentiality.

6.7. Appeals Process

If the complainant is not satisfied with the outcome, they may appeal in writing to the **Chair of Trustees**. Contact details will be provided in the complaint response.
Appeals must be submitted within **28 days** of receiving our response and should explain:

- Why the decision is felt to be incorrect.
- Any additional information that supports this view.

The Chair (or another trustee not previously involved) will review the appeal and provide a final decision within **28 days**. This decision is final.

6.8. Anonymous Complaints

Anonymous complaints will be recorded and considered as far as possible. However:

- They may limit our ability to investigate fully.
- We must also protect volunteers and members of the public from unsubstantiated or malicious allegations.

For these reasons, we encourage complainants to provide contact details wherever possible.

8. Safeguarding, Risk and Data Protection

- Any complaint involving **children or adults at risk** will be handled in line with TDN's Safeguarding Policy.
- Personal information will be handled securely and only shared when necessary for investigation or safety.
- We comply with UK GDPR and will not disclose sensitive personal information without lawful reason.
- Records of complaints will be stored securely and retained in line with TDN's data retention schedule.
- In respect of data protection complaints, once any appeals process had concluded, remind the data subject that they may raise a complaint with the Information Commissioner's Office (ICO).

9. Insurance and Potential Claims

If a complaint (including data protection complaints) suggests there may be a claim for compensation (e.g., injury, damage to property), trustees will notify TDN's insurers promptly. Volunteers should not make commitments or statements about liability.

10. Learning and Improvement

Trustees will consider whether complaints highlight areas for improvement, such as:

- Updates to policies or guidance
- Additional volunteer training
- Changes to visit procedures
- Strengthening safeguarding or risk management

Any changes will be communicated to volunteers.

11. Availability of This Policy

This policy is publicly available and will be provided to anyone who requests it or indicates they wish to make a complaint.

7. Data Protection Policy

Therapy Dogs Nationwide (TDN) is committed to protecting the personal information of everyone involved in our work; volunteers, beneficiaries, supporters, staff, and members of the public. We follow the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance from the Information Commissioner's Office (ICO). This policy explains how we collect, use, store, and protect personal data in a way that is lawful, fair, and transparent. It applies to trustees, operational teams, regional teams, and anyone acting on behalf of TDN.

7.1. Roles and Responsibilities

- **Trustees**
  - Set the strategic direction for data protection.
  - Ensure TDN complies with UK GDPR and Charity Commission expectations.
  - Approve this policy and review it annually.
- **Data Protection Lead**
  - Oversees day-to-day data protection.
  - Acts as the main contact for data protection queries and concerns.
  - Leads investigations into any data breaches.
  - Ensures volunteers and regional teams receive appropriate guidance and training.
- **Operational Team and Regional Teams**
  - Follow this policy when handling personal data.
  - Report concerns or breaches promptly.
  - Use TDN systems and processes safely and responsibly.
- **Visiting Volunteers (Handlers)**
  - Only collect or use personal data when necessary for a therapy dog visit.
  - Keep any personal information shared during visits confidential.
  - Seek guidance if unsure about consent or safe data handling.

7.2. What Counts as Personal Data?

Personal data is any information that identifies a living person. Examples include:

- Name, address, email, phone number
- Volunteer or beneficiary records
- Images or videos of identifiable individuals

Sensitive (special category) data includes:

- Health information
- Ethnic origin
- Information about children or vulnerable adults

TDN only collects sensitive data when absolutely necessary and with clear consent.

7.3. How TDN Uses Personal Data

We collect personal data for clear and legitimate reasons, including:

- Managing volunteer registrations and renewals
- Coordinating therapy dog visits
- Safeguarding and risk management
- Responding to enquiries
- Fundraising and donor stewardship (where consent is given)

We do not use personal data for any purpose other than the one it was collected for, unless we obtain new consent.

7.4. Data Protection Principles (Plain English)

TDN follows the six UK GDPR principles. In practice, this means:

- **Lawful, fair, and transparent**

We explain why we collect data and how it will be used. Individuals can ask to see their data at any time.

- **Collected for a clear purpose**

We only collect what we need to run the charity safely and effectively.

- **Limited to what is necessary**

We avoid collecting unnecessary information.

- **Accurate and up to date**

We correct mistakes promptly and encourage volunteers to update their details.

- **Kept only as long as needed**

We follow retention schedules appropriate for charities (e.g., safeguarding records, financial records).

- **6. Secure**

We protect data from loss, misuse, or unauthorised access.

7.5. Keeping Data Safe

TDN uses practical, proportionate measures to keep data secure:

- **Digital Security**
  - Password-protected systems
  - Restricted access to volunteer and visit records
  - Up-to-date antivirus and firewall protection
- **Paper Records**
  - Stored securely and only accessible to authorised volunteers
  - Shredded or securely disposed of when no longer needed
- **Back-ups and Recovery**
  - TDN maintains appropriate back-up processes to ensure data can be recovered if systems fail.

7.6. Individual Rights

Everyone whose data we hold has rights under UK GDPR, including:

- The right to be informed
- The right to access their data
- The right to correct inaccurate data
- The right to request deletion (where appropriate)
- The right to restrict or object to processing

Requests should be directed to the Data Protection Lead.

7.7. Imagery and Video

Images and videos are personal data. Volunteers must take extra care when capturing or using images during therapy dog visits.

- **Guidance for Volunteers**
  - Always obtain consent before taking or using photos of individuals or small groups.
  - For children or vulnerable adults, consent must come from a parent, guardian, or responsible professional.
  - Large group photos should include an opportunity for people to opt out.
  - Only use images for the purpose explained at the time consent was given.
  - Do not share images on personal social media unless explicitly authorised by TDN.

7.8. Children and People Who Cannot Give Consent

TDN volunteers often visit settings involving children or vulnerable adults.

- Children under 13 cannot legally give consent.
- Consent must come from a parent, guardian, or responsible professional.

- Information shared by children or vulnerable adults must be treated sensitively and confidentially.
- If someone cannot give informed consent, decisions must be made in their best interests and with appropriate authority (e.g., a carer or attorney).

7.9. Safeguarding and Risk

Data protection supports safeguarding. Volunteers must:

- Keep personal information confidential
- Report concerns immediately
- Avoid recording unnecessary personal details during visits
- Never store beneficiary information on personal devices

Safeguarding concerns should be reported through TDN's safeguarding procedures.

7.10. Data Breaches

A data breach includes accidental loss, unauthorised access, or disclosure of personal data.

If a breach occurs:

- Report it immediately to the Data Protection Lead.
- The Lead will investigate and take action to reduce harm.
- If the breach poses a risk to individuals, TDN will notify the ICO within 72 hours.

Examples of harm include discrimination, financial loss, or damage to reputation.

7.11. Fundraising and Communications

TDN respects the privacy and contact preferences of donors and supporters.
We comply with:

- Fundraising Regulator guidance
- PECR rules for electronic communications
- The Fundraising Preference Service

Supporters can opt out of communications at any time.

7.12. International Data Transfers

TDN does not routinely transfer data outside the UK. If this ever becomes necessary, we will follow ICO guidance and ensure appropriate safeguards.

7.13. Artificial Intelligence

TDN follows the Charity AI Ethics & Governance Framework and ICO guidance when using AI tools. AI will never be used to make automated decisions about volunteers or beneficiaries.

7.14. Data Protection Complaints

A data subject may raise a data protection complaint with us for any matter concerning their personal data, including, but not limited to a compliant relating to an infringement of their rights or complaining about the security of personal data. Any compliant relating to data protection requires to TDN to use the Complaints process set out at in the Complaints Policy at section 6 above. Data Protection Complaints can be sent to:

- **Email**:[trustees@tdn.org.uk or help@tdn.org.uk]
- **Post**: Therapy Dogs Nationwide, 66 Paul Street, London, EC2A 4NA

Please mark correspondence "**Private and Confidential – Data Protection Complaint**".
We will provide a copy of our complaints policy on request.

8. Due Diligence Policy

Therapy Dogs Nationwide (TDN) works with a wide range of organisations, community groups, and individuals. This policy explains how we check that potential partners, donors, and project opportunities are safe, appropriate, and aligned with our values.

Due diligence helps us protect:

- The safety and wellbeing of our volunteers, dogs, and the people we visit
- TDN's reputation as a trusted UK charity
- Our compliance with charity law, safeguarding standards, and data protection requirements

This policy is designed to be clear, practical, and accessible for trustees, operational volunteers, and regional teams.

8.1. Roles and Responsibilities

- **Trustees**
  - Hold ultimate responsibility for ensuring TDN acts legally, safely, and in line with our charitable purpose.
  - Approve partnerships, donations, or projects that carry higher levels of risk.
  - Review due diligence findings when escalation is required.
- **Operational Team (including Coordinators, Regional Leads, and designated volunteers)**
  - Carry out proportionate due diligence checks as outlined in this policy.
  - Flag any concerns to the trustees promptly.
  - Maintain secure records of checks carried out, in line with GDPR.
- **Volunteers**
  - Are not required to conduct formal due diligence.
  - Should raise any concerns about a potential partner, donor, or visit setting with their Coordinator or Regional Lead.
  - May be asked for informal insight (e.g., local knowledge of an organisation), but participation is optional.

8.2. What "Due Diligence" Means at TDN

Due diligence is simply the process of checking that working with a person or organisation is safe, appropriate, and in the best interests of the charity.

For TDN, this includes considering:

- Safety and safeguarding
- Reputational risk
- Financial risk (for donations or funded projects)
- Ability of the partner to deliver what they promise
- Alignment with TDN's values of kindness, professionalism, and community benefit

Checks should always be proportionate. A small community group hosting a one-off visit needs far less scrutiny than a large organisation offering a major partnership or donation.

8.3. When We Carry Out Due Diligence

We conduct due diligence when:

- Entering into a partnership or formal agreement
- Accepting significant donations or gifts
- Working with organisations or individuals where risk may be higher
- Concerns have been raised by volunteers, staff, or members of the public

Routine therapy dog visits do **not** require formal due diligence unless a specific concern arises.

8.4. Proportionate Risk Assessment

Before carrying out checks, consider the scale of risk:

Factors to consider

- **Amount of money involved** (for donations or funded projects)
- **Sensitivity of the setting** (e.g., vulnerable groups, secure environments)
- **Public reputation of the organisation or individual**
- **Potential for harm** – to people, dogs, volunteers, or TDN's reputation
- **Complexity or scale of the project**

This helps determine whether basic checks are sufficient or whether additional checks are needed.

8.5. Basic Checks for Organisations

These checks are usually carried out by the operational team:

- **Website review** Ensure the organisation's activities match what they are proposing. Look at leadership information, values, and any public statements.
- **Internet search** Look beyond the first page of results for any serious past issues.
- **References or informal insight** Where appropriate, speak to someone who has worked with them or knows the sector.
- **Conflicts of interest** Confirm any personal or professional connections are declared and managed in line with TDN's Conflict of Interest Policy.

All findings must be stored securely and only shared with those who need to know.

8.6. Additional Checks (Used Only When Needed)

For higher-risk partnerships or donations, additional checks may be appropriate:

- **Ethical considerations**

Check for involvement in activities that conflict with TDN's values, such as:

  - Discrimination
  - Exploitation of people or animals
  - Illegal activity
  - Radical or harmful groups
  - Environmental harm

- **Safeguarding**

Confirm that organisations working with vulnerable people have appropriate safeguarding policies and procedures.

- **Regulatory compliance**

Where relevant, check:

  - Charity Commission records
  - Companies House filings
  - Membership of professional bodies
  - Required licences or insurances

- **Financial stability (for significant donations or funded projects)**

Look for:

  - Signs of insolvency
  - Court judgements
  - Major financial instability
  - Concerns raised by auditors

- **Sanctions**

If there is any reason to believe an organisation or individual may be subject to UK sanctions, consult the OFSI guidance and seek trustee approval before proceeding.

8.7. Due Diligence for Donors

TDN gratefully accepts donations that support our charitable work. However, we must ensure that accepting a gift is safe and appropriate.

We may carry out checks when:

- A donation is unusually large
- A donor wishes to remain anonymous
- A donation appears suspicious or inconsistent
- A donor is a vulnerable individual
- There is a risk the donor may be on a UK sanctions list

If concerns arise, the matter must be escalated to the trustees.

8.8. Individuals (Higher-Risk Situations Only)

In rare cases, it may be appropriate to check individuals connected to a partnership or donation. Examples include:

- Bankruptcy or insolvency
- Disqualification as a company director
- Removal as a charity trustee due to misconduct
- Court judgements

These checks are carried out only when necessary and always proportionately.

8.9. Data Protection and Privacy

All due diligence activity must comply with GDPR:

- Only collect information that is necessary for a legitimate charity purpose
- Store findings securely
- Share information only with those who need to know
- Delete information when it is no longer required

Volunteers should never conduct checks that require access to personal data unless specifically authorised.

8.10. Reputational Risk

TDN must avoid partnerships or donations that could harm public trust. Consider:

- Negative media coverage
- Public complaints
- Concerns raised by other charities or funders
- Activities that conflict with TDN's values or mission

If reputational risk is identified, the trustees must review the situation.

8.11. Ability to Deliver

For projects or partnerships, consider whether the organisation can realistically deliver what they propose:

- Track record
- Capacity and staffing
- Reliance on a single individual
- Supply chain issues
- Experience in the relevant area

If concerns arise, seek references or request clarification.

8.12. Contracts and Agreements

Any formal agreement must:

- Be clearly charitable in purpose
- Set out what will be delivered, when, and how
- Include monitoring and reporting arrangements

- Allow TDN to withdraw or reclaim funds if necessary
- Be reviewed by trustees for higher-risk projects

8.13. Artificial Intelligence (AI)

If a partner uses AI in a way relevant to the project, they must comply with the Charity AI Ethics & Governance Framework. This ensures safety, transparency, and responsible use.

8.14. Escalation and Decision-Making

- Operational volunteers carry out initial checks.
- Any concerns must be escalated to the trustees.
- Trustees make final decisions on higher-risk partnerships or donations.
- Decisions must be recorded and stored securely.

9. Fundraising Policy

This policy explains how Therapy Dogs Nationwide (TDN) carries out fundraising in a responsible, ethical, and safe manner. It supports trustees, regional leads, coordinators, and volunteers by setting clear expectations that reflect TDN's values of kindness, clarity, safety, and professionalism.

TDN aims to be open, honest, and respectful in all fundraising activities. Our approach follows UK charity law, Charity Commission guidance, and the Code of Fundraising Practice.

9.1. Roles and Responsibilities

- **Trustees**

Trustees hold overall responsibility for ensuring that fundraising is lawful, ethical, and aligned with TDN's charitable purpose. Their responsibilities include:

- Acting in the charity's best interests and managing conflicts of interest.
- Setting fundraising strategy and ensuring risks are identified and managed.
- Ensuring funds are used appropriately and for their intended purpose.
- Reviewing serious concerns or complaints related to fundraising.
- Approving commercial partnerships or higher-risk fundraising activities.

Trustees oversee fundraising but do not manage day-to-day activity.

- **Operational Team (Regional Leads, Coordinators, Approved Volunteers)**

Operational Team support fundraising by:

- Following this policy and any related procedures.
- Ensuring local fundraising activities are safe, respectful, and appropriate for TDN's reputation.
- Providing clear information to supporters about TDN's work.
- Escalating concerns to trustees promptly, including safeguarding, data protection, or complaints.
- Keeping basic records where needed, such as donation details or event information.

Operational volunteers may organise fundraising activities but cannot enter into binding agreements on behalf of TDN unless authorised by trustees.

- **General Volunteers**

General volunteers may choose to support fundraising activities but are not required to do so. When they participate, they are expected to:

- Represent TDN positively and kindly.
- Follow simple guidance provided for events or campaigns.
- Pass any donation information or concerns to their regional lead or trustees.

No volunteer is expected to manage complex fundraising tasks or handle situations they feel unsure about.

- **Supporters**

Supporters have the right to:

- Clear, accurate information about TDN's work and how donations are used.
- Have their personal data handled safely and respectfully.
- Choose how and when they are contacted.
- Raise questions or concerns without hesitation.

TDN will respond promptly to requests to stop contact and will address complaints with care and transparency.

- **Beneficiaries and Representation**

Beneficiaries include the people we visit, the organisations we support, and the therapy dogs and handlers who deliver our service.

When referring to beneficiaries in fundraising:

- They will always be portrayed respectfully and in a way that reflects their dignity.
- Personal information will only be used with clear consent and for agreed purposes.

- Extra care will be taken when referring to children or vulnerable adults.
- No information will be shared that could place anyone at risk.

9.2. Respectful Conduct, Bullying and Abuse

TDN does not tolerate bullying, discrimination, harassment, or abuse in any fundraising context.
Everyone involved in fundraising must treat others with kindness and respect. Volunteers should feel safe to raise concerns, and any allegations will be handled sensitively and in line with TDN's safeguarding and complaints procedures.

9.3. Working With Vulnerable Individuals

When speaking with potential donors, volunteers must be mindful of signs that someone may be vulnerable or unable to make an informed decision. Volunteers should consider whether the person can retain information, explain their decision, understand what is being discussed, and follow the conversation.
If someone appears vulnerable, volunteers should:

- Communicate clearly and gently.
- Avoid assumptions.
- Ask what support they need.
- Summarise information in plain English.
- Adjust communication style if needed.

TDN will not place pressure on anyone to donate and will not accept donations from individuals who may be unable to make their own decisions. Volunteers should be sensitive to any particular needs a donor may have.

9.4. Commercial Partnerships

TDN may work with companies or organisations to raise funds, but only when the partnership aligns with our charitable aims and values.
Trustees will ensure that:

- The partner's activities do not conflict with TDN's mission.
- The agreement is fair and clearly sets out expectations.
- Risks are identified and managed.
- The partnership can be monitored effectively.

9.5. Donations

- **Restricted Donations**

Supporters may request that their donation be used for a specific purpose. Written instructions are required, and TDN will respect these wishes.

- **Accepting or Refusing Donations**

Trustees must decide whether accepting a donation is in TDN's best interests. A donation may be refused if:

- It could harm TDN's reputation.
- It conflicts with TDN's charitable aims.
- It appears suspicious or unsafe.
- It comes from a source that raises ethical concerns.

TDN maintains a Refusals & Acceptance of Donations procedure to support decision-making.

- **Due Diligence**

TDN will carry out reasonable checks on significant donations or donors to ensure:

- The gift is safe to accept.
- The donor's activities do not conflict with TDN's values.
- Large anonymous gifts or unusual donations are handled appropriately.

9.6. Safeguarding and Risk Management

Fundraising activities must be planned with safety in mind:

- Volunteers should only take part in activities they feel confident and comfortable with.
- Events must consider risks to volunteers, therapy dogs, and the public.
- Any safeguarding concerns must be reported immediately to the Safeguarding Lead or trustees.
- Therapy dogs must never be placed in stressful or unsafe environments for fundraising purposes.

10. Data Protection (GDPR)

When handling donor or supporter information:

- Only necessary information will be collected.
- Data will be stored securely.
- Information will be used only for the purpose it was given.
- Personal data will not be shared without consent unless legally required.
- Supporters may request access to or deletion of their data at any time.

9.7. Artificial Intelligence

Where TDN uses AI tools for administration or communication, we follow the Charity AI Ethics & Governance Framework. AI will not be used to make automated decisions about donors or beneficiaries.

9.8. Complaints and Feedback

Supporters and volunteers can raise concerns about fundraising at any time. TDN will:

- Acknowledge complaints promptly.
- Investigate fairly and sensitively.
- Respond with clear outcomes.
- Report serious issues to trustees.

10.Grievance Policy

Therapy Dogs Nationwide (TDN) aims to create a kind, respectful, and supportive environment for everyone involved in our charity. Volunteers, coordinators, staff, or trustees may occasionally have concerns about their experience within TDN. This policy explains how individuals can raise those concerns and how TDN will respond.

Our approach is based on fairness, kindness, transparency, safety, and respect for all people and animals involved in our work. Concerns will always be taken seriously, handled sensitively, and addressed without fear of disadvantage or retaliation.

10.1. Who This Policy Applies To

This policy applies to:

- TDN volunteers
- Regional volunteer coordinators and leads
- Any staff employed by TDN
- Trustees, when acting in their governance capacity

This policy does not cover:

- Complaints about TDN's services from members of the public
- Safeguarding concerns
- Issues relating to dog welfare or visit safety

Separate policies and guidance exist for those matters.

10.2. What Is a Grievance?

A grievance is any concern, problem, or complaint raised by a volunteer, coordinator, staff member, or trustee about their involvement with TDN.

Examples include:

- How someone has been spoken to or treated
- Bullying, harassment, or discrimination
- Communication issues within a team
- Concerns about fairness or decision-making
- Issues affecting wellbeing, safety, or inclusion
- Problems with how volunteer duties are organised
- Concerns about changes to processes or expectations

A grievance is not a complaint about the public, a visiting venue, or dog behaviour.

10.3. Principles We Follow

TDN will ensure that:

- Everyone is treated with dignity and respect
- Concerns are listened to without judgement
- Issues are addressed promptly and proportionately
- Confidentiality is maintained wherever possible
- Safeguarding and safety risks are prioritised
- No one is disadvantaged for raising a concern in good faith
- Records are kept securely and in line with data protection law

10.4. Safeguarding, Safety, and Data Protection

Some grievances may involve safeguarding or safety risks. If this happens:

- TDN may need to share information with the Safeguarding Lead or external agencies if legally required
- The individual raising the concern will be informed whenever possible
- Safety of people and animals will always come first

All information will be handled in line with GDPR and TDN's Data Protection Policy.

10.5. Informal Resolution

Many concerns can be resolved quickly through a calm, supportive conversation.
If you feel comfortable, you are encouraged to raise the issue informally with:

- Your Regional Coordinator
- A trusted volunteer lead
- The Volunteer Support Team

Informal resolution may include supportive discussion, clarifying expectations, mediation, or agreeing practical steps to improve communication or working relationships.
If the concern involves your coordinator or you feel unable to raise it informally, you may contact the Volunteer Support Team or the Chair of Trustees directly.

10.6. Formal Grievance Procedure

If the matter cannot be resolved informally, or if it is serious, you may raise a formal grievance.

- **Submit Your Concern in Writing**

Write to the Chair of Trustees. Your written grievance should include:

  - What happened
  - When it happened
  - Who was involved
  - Any evidence you wish to share
  - What outcome you are hoping for

- **Acknowledgement**

TDN will acknowledge your grievance within 10 working days, confirming:

  - Who will look into the matter
  - Whether a meeting is needed
  - Any next steps

- **Grievance Meeting**

You may be invited to a meeting with the person handling the grievance. You are welcome to bring:

  - A fellow volunteer
  - A friend or supporter
  - A staff colleague (if applicable)

The purpose of the meeting is to understand your concern fully. Notes will be taken and shared with you.

- **Investigation**

TDN will carry out a proportionate and fair investigation. This may include speaking to others involved, reviewing relevant communications or documents, and considering safeguarding or safety implications. Investigations will be conducted sensitively and confidentially.

- **Outcome**

You will receive a written outcome within 1 month of the meeting or investigation. The response will explain:

  - What was considered
  - The decision
  - Any actions TDN will take
  - Your right to appeal

10.7. Appeal Process

If you disagree with the outcome, you may appeal in writing within 10 working days.
Your appeal will be reviewed by a trustee who was not previously involved, or another senior volunteer leader. A meeting may be held if helpful. The appeal decision will be provided in writing and is final.

10.8. Confidentiality

TDN will keep all grievance information confidential and only share it with people who need to be involved. Confidentiality cannot be guaranteed if:

- There is a safeguarding concern
- Someone is at risk
- There is a legal obligation to disclose information

10.9. Protection from Retaliation

No volunteer, staff member, or trustee will be treated unfavourably for raising a concern in good faith. Any retaliation will be treated seriously and may lead to removal from volunteer duties or other appropriate action.

10.10. Malicious or Bad-Faith Complaints

TDN encourages open and honest communication. However, grievances found to be deliberately false or malicious may result in appropriate action, in line with TDN's volunteer conduct expectations.

10.11. Record Keeping

TDN will keep records of formal grievances, meetings, investigations, and outcomes securely for six years, in line with our Data Protection Policy.

11.Recruitment Policy

Therapy Dogs Nationwide (TDN) is a volunteer-led UK charity providing therapeutic dog visits in community settings. Volunteers are central to our mission, and this policy explains how we recruit, welcome, and support them in a way that is safe, fair, and aligned with Charity Commission expectations.

Our aim is to help each volunteer find a role they enjoy and feel confident in. Roles vary from visiting volunteers to regional support roles and specialist positions. All volunteers are welcome, subject to meeting mandatory requirements that ensure safety and suitability.

11.1. Governance and Responsibilities

- **Trustees**
  - Set the strategic direction for volunteer recruitment and safeguarding.
  - Approve this policy and review it annually.
  - Ensure compliance with charity law, safeguarding legislation, and data protection requirements.
- **Operational Team (Coordinators, Assessors)**
  - Implement this policy in day-to-day practice.
  - Provide clear information to prospective volunteers.
  - Carry out vetting checks and induction processes.
  - Offer ongoing support, guidance, and training.
- **Volunteers**
  - Participate in recruitment and induction activities.
  - Follow TDN's policies, including safeguarding, data protection, and dog welfare.
  - Ask for help whenever needed, support is always available.

11.2. Promoting Volunteer Opportunities

TDN promotes volunteering opportunities through accessible, community-focused channels, including:

- Local community websites and fundraising platforms.
- Social media groups relevant to therapy dog work or local communities.
- Posters in community spaces such as libraries, GP surgeries, churches, mosques, and shops.
- Networks of professionals who support potential beneficiaries, such as schools, care homes, and charities.

Information can be provided in alternative formats or languages to ensure accessibility for people with disabilities or additional needs.

11.3. Recruitment Process

Our recruitment process is designed to be welcoming, safe, and proportionate for a volunteer-led charity.

- **Initial Contact**

Prospective volunteers receive:

  - A warm introduction to TDN's work and values.
  - Clear information about what volunteering involves.
  - An explanation of our commitment to safeguarding and safety during visits.

- **Mandatory Checks**

To protect beneficiaries, volunteers, and dogs, TDN carries out appropriate checks before confirming a volunteer role. These may include:

  - Identity verification.
  - Reference checks.
  - Qualification or licence checks where legally required.
  - Dog temperament and behaviour assessment for visiting roles.

- **Safeguarding and Risk**

All volunteers must:

- Read and follow TDN's Volunteers Handbook.
- Report any concerns immediately to a Regional Lead or Safeguarding Officer.
- Follow safety guidance for visits, including risk assessments for new venues.
- Data Protection (GDPR)

TDN collects only the information needed for safe and effective volunteering. Volunteers are informed about:

- What data we collect and why.
- How it is stored and used.
- Their rights under GDPR.

Data is stored securely and never shared without lawful reason.

11.4. Selection Criteria

TDN welcomes volunteers with a wide range of skills and experiences. Selection is based on suitability for the role and alignment with TDN's values.

Volunteers should demonstrate:

- A commitment to helping others and supporting TDN's mission.
- Kindness, patience, and a positive approach to engaging with people.
- Sufficient time and flexibility to carry out the role safely.
- Ability to work independently and as part of a team.
- Good communication skills and a willingness to ask questions.

Where a role requires specific qualifications or experience (e.g., safeguarding lead, specialist advisory roles), these will be clearly explained.

11.5. Ongoing Support

Volunteers receive:

- Regular contact from Regional Leads or Coordinators.
- Opportunities to ask questions or raise concerns.
- Support if circumstances change or if a volunteer needs to pause or adjust their involvement.

11.6. Accessibility and Inclusion

TDN is committed to being inclusive. We will make reasonable adjustments to support volunteers with disabilities, health conditions, or additional needs.

Volunteers are encouraged to tell us what support would help them thrive.

11.7. Exceptions and Role Suitability

TDN aims to welcome everyone. However, there are rare situations where volunteering may not be possible, for example:

- A role requires specific legal qualifications or checks that cannot be met.
- A dog does not meet the behavioural standards required for therapy work.
- A volunteer's availability does not align with the safety requirements of the role.

Where one role is not suitable, we will explore alternatives and aim to find a way for the volunteer to contribute to TDN's work.

12.Reserves Policy

This policy explains why Therapy Dogs Nationwide holds financial reserves and how these reserves help us remain stable, safe, and able to support our volunteers, beneficiaries, and communities. It provides reassurance to donors, funders, volunteers, and beneficiaries that TDN manages its finances responsibly and plans for the future with care. Reserves help ensure that TDN can continue operating even if income fluctuates, unexpected costs arise, or new opportunities emerge that support our charitable aims.

12.1. What We Mean by Reserves

Reserves are the part of TDN's unrestricted funds that can be used for any of our charitable purposes.
Some funds are not counted as reserves:

- Tangible fixed assets used for our work (e.g., equipment).
- Programme-related investments held solely to further our charitable aims.
- Designated funds that trustees have set aside for essential future spending (e.g., a planned project or system upgrade).
- Liabilities already recognised in the accounts.

Restricted funds are also not reserves. These are donations or grants that must be used for a specific purpose. While restricted funds support our work, they cannot be used to meet general financial needs and therefore do not reduce the need for reserves.

12.2. How We Set Our Reserves Policy

The trustees review TDN's financial position each year and consider:

- The types of funds we hold (restricted and unrestricted).
- Planned activity for the coming years, including volunteer support, safeguarding, training, and operational needs.
- Any future projects or essential spending that cannot be met from a single year's income.
- Risks or uncertainties that may require additional financial resilience (e.g., unexpected operational costs, safeguarding requirements, or changes in income).

This process helps trustees identify why reserves may be needed and determine an appropriate level.

12.3. Target Level of Reserves

TDN aims to hold a target level of reserves that supports safe, stable, and sustainable operations. The target level is based on:

- Forecasted income and how reliable each income source is.
- Planned expenditure for the year, including volunteer support, insurance, safeguarding, and operational costs.
- Future needs or opportunities where income may not cover anticipated costs.
- Risks that could impact the charity's ability to operate (e.g., IT failure, insurance increases, safeguarding requirements, or unexpected legal or compliance costs).

The trustees set a target figure or range that reflects TDN's size, volunteer-led structure, and the nature of our work in community settings.

12.4. Monitoring and Reviewing Reserves

The trustees monitor reserves throughout the year as part of regular financial oversight. If reserves fall below or rise above the target level, trustees will consider:

- Whether the change is temporary or long-term.
- Whether action is needed, such as adjusting spending plans or designating funds for future needs.

The reserves policy is reviewed annually as part of TDN's financial planning cycle.

12.5. Annual Reporting

TDN will include the following in its annual report:

- The reserves policy.

- The level of reserves held at year-end.
- The reasons for holding these reserves.
- Any designated funds, including the purpose and expected timing of expenditure.

Reporting will follow Charity Commission guidance and the Charities SORP (FRS 102).

12.6. Investing Reserves

If TDN holds significant reserves for more than one year, trustees may consider investing part of these funds to generate a financial return. When doing so, trustees will consider:

- When the funds may be needed (liquidity).
- The level of investment risk appropriate for a small volunteer-led charity.
- Charity Commission guidance on responsible investment.

Any investment decisions will prioritise the safety and sustainability of TDN's work.

12.7. Safeguarding, Risk, and Data Protection Considerations

TDN's reserves policy supports our commitment to:

- **Safeguarding** volunteers, beneficiaries, and the public during therapy dog visits.
- **Risk management**, ensuring we can respond to unexpected costs such as insurance changes, equipment replacement, or safeguarding requirements.
- **Data protection**, ensuring we can meet GDPR obligations, including secure systems and appropriate handling of volunteer and beneficiary information.

Reserves help ensure TDN can act quickly and responsibly if safeguarding or data protection needs arise.

12.8. Roles and Responsibilities

- **Trustees**
  - Set the reserves policy
  - Monitor financial stability
  - Make decisions about designated funds
  - Ensure compliance with Charity Commission guidance
- **Operational Team**
  - Support trustees by providing information on planned activities, volunteer needs, and operational risks that may influence reserve levels.
- **Volunteers**
  - Are not responsible for financial management but may contribute insight into local needs or risks that help inform planning.

13.Safeguarding Policy

Therapy Dogs Nationwide (TDN) is a volunteer-led UK charity providing therapeutic dog visits in community settings such as schools, hospitals, care homes and public venues. Many of the people we meet may be vulnerable due to age, disability, illness or personal circumstances.

Safeguarding means protecting people from harm, abuse, neglect or exploitation. Everyone involved in TDN has a role in keeping people safe and ensuring our visits are positive, respectful and appropriate.

13.1. Purpose of This Policy

This policy aims to:

- Keep beneficiaries, volunteers and the public safe during TDN activities.
- Provide clear guidance for volunteers, regional teams and trustees.
- Ensure TDN meets Charity Commission expectations for safeguarding in small-to-medium charities.
- Support a culture where people feel able to speak up if something doesn't feel right.

13.2. Who This Policy Applies To

This policy applies to:

- Trustees
- Regional volunteer leads and coordinators
- All visiting volunteers and therapy dog teams
- Anyone representing TDN at events or activities

Partner organisations (e.g., schools, hospitals, care homes) must have their own safeguarding procedures. TDN volunteers should follow the partner organisation's rules **and** this policy.

13.3. Our Safeguarding Principles

TDN believes that:

- Everyone we meet should feel safe, respected and protected from harm.
- Safeguarding is everyone's responsibility, not just trustees.
- Volunteers should feel confident to raise concerns without fear of criticism.
- Kindness, clarity and professionalism guide all our interactions.

13.4. Definitions Volunteers May Need

- **Vulnerable Person**

Anyone who may be at greater risk of harm due to age, disability, illness, mental health, or personal circumstances.

- **Abuse**

Abuse can be physical, emotional, sexual, financial, neglect, exploitation or institutional. Examples are listed in Appendix A.

- **Safeguarding Concern**

Anything that makes you feel uncomfortable or worried about someone's safety or wellbeing.

- **Serious Incident**

An incident that may require reporting to the Charity Commission (e.g., serious harm, allegations against volunteers, major safeguarding breaches).

13.5. Roles and Responsibilities

- **Trustees**

Trustees set the safeguarding approach for the charity. They:

  - Approve this policy and review it annually.
  - Ensure TDN complies with Charity Commission guidance.
  - Appoint a Lead Safeguarding Trustee to oversee safeguarding.
  - Ensure serious incidents are reported to the Charity Commission when required.

- Ensure appropriate DBS checks and safeguarding training are in place.
- Ensure personal data is handled safely and lawfully.
- Support volunteers and regional leads when concerns arise.

- **Lead Safeguarding Trustee**

The Lead Trustee oversees safeguarding practice, supports volunteers, and leads investigations when needed.
Lead Trustee: Mary Oliver email: mary@tdn.org.uk

- **Operations Team / Regional Leads**

They:

- Provide volunteers with clear guidance on safeguarding and reporting.
- Ensure volunteers know how to raise concerns.
- Support volunteers if an incident occurs during a visit.
- Inform the Lead Trustee promptly of any safeguarding concerns.

- **Volunteers**

Volunteers are the heart of TDN. Their responsibilities are simple and supportive:

- Follow this policy and any safeguarding rules of the venue.
- Be alert to signs of possible abuse or neglect.
- Report concerns immediately (even if unsure).
- Keep personal information safe and only share it when necessary.
- Ensure their dog is calm, safe and suitable for the environment.
- Never put themselves or others at risk.

Volunteers are not expected to diagnose abuse, investigate concerns, or make complex decisions. Their role is to notice and report.

13.6. Recognising Abuse

Abuse can take many forms. Signs may include:

- Unexplained injuries
- Sudden changes in behaviour
- Fearfulness around certain people
- Poor hygiene or living conditions
- Signs of financial exploitation
- Reports from the individual themselves

A full list is provided in Appendix A.
If something feels wrong, report it. You do not need proof.

13.7. Reporting Safeguarding Concerns

- **If someone is in immediate danger:** Call 999.
- **If you are a volunteer:** Report concerns to:
  - The venue's safeguarding lead (if appropriate), and
  - Your Regional Lead, or
  - The Lead Safeguarding Trustee (contact details above)
- **If you are a member of the public:**

Speak to any TDN volunteer, who will pass the concern to a Regional Lead or Trustee.

What happens next

- The Lead Trustee will assess the concern.
- If needed, they will contact statutory services (police, social care).
- Trustees will consider whether the incident needs reporting to the Charity Commission.
- Volunteers will be supported throughout.

You will always be listened to and treated with kindness.

13.8. Risk Management for Visits

TDN volunteers should:

- Follow venue rules and guidance.
- Ensure the environment is safe for both people and dogs.
- Avoid situations where they are alone with a vulnerable person behind closed doors.
- Keep interactions appropriate and professional.
- End a visit early if a situation feels unsafe.

Operations Team may ask volunteers to complete simple risk checks before new venues are approved.

13.9. Data Protection and Privacy

TDN follows UK GDPR principles. Volunteers should:

- Only collect personal information when necessary (e.g., contact details for scheduling).
- Store information securely and never share it without permission.
- Obtain consent before taking or sharing photos or videos.
- Use TDN-approved systems for storing volunteer or visit information.
- Report any data concerns to the Lead Trustee.

13.10. Online Safety

TDN will:

- Use secure platforms for meetings and communications.
- Provide guidance to volunteers on staying safe online.
- Ensure any online services used with beneficiaries are age-appropriate and safe.
- Only share images online when consent has been given.
- Explain how to report online concerns.

13.11. Working With Other Organisations

When partnering with schools, hospitals, care homes or community groups, TDN will:

- Check that the organisation has appropriate safeguarding procedures.
- Agree roles and responsibilities in writing when needed.
- Ensure volunteers understand any venue-specific rules.
- Review concerns jointly when appropriate.

13.12. Fundraising Safeguarding

TDN will:

- Follow the Code of Fundraising Practice.
- Ensure fundraising involving children or vulnerable adults is safe and appropriate.
- Avoid placing pressure on anyone to donate.
- Decline donations from individuals who may not have capacity to make financial decisions.
- Provide volunteers with clear guidance for safe fundraising.

13.13. Appendix A – Signs of Abuse

Below are examples of signs that may indicate abuse. This list is not exhaustive.

- **Physical Abuse**

“bruises, black eyes, welts, lacerations, and rope marks” “open wounds, cuts, punctures, untreated injuries in various stages of healing”

- **Sexual Abuse**

“unexplained venereal disease or genital infections” “torn, stained, or bloody underclothing”

- **Emotional or Psychological Abuse**

Extreme withdrawal
Nervousness around certain people
Reports of verbal or mental mistreatment

- **Neglect**

“dehydration, malnutrition, untreated bed sores and poor personal hygiene” “hazardous or unsafe living condition (e.g., improper wiring, no heat or running water)”

- **Self-Neglect**

“unsanitary or unclean living quarters (e.g., animal/insect infestation, no functioning toilet)” “inadequate medical care, not taking prescribed medications properly”

- **Financial Exploitation**

“unexplained disappearance of funds or valuable possessions” “forging a signature on financial transactions or for the titles of possessions”
If you notice any of these signs, or anything else that concerns you, report it immediately.

14.Social Media Policy

Social media is an important way for Therapy Dogs Nationwide (TDN) to share our work, celebrate our volunteers, and promote the wellbeing benefits of therapy dog visits. This policy explains how trustees, volunteers, and members of the operational team can use social media safely, responsibly, and in a way that protects our charity's reputation and the people we support.

This policy applies to anyone representing TDN in any capacity, including trustees, regional volunteer teams, and operational team.

14.1. Key Principles

- We communicate with kindness, professionalism, and respect.
- We protect the safety, dignity, and privacy of the people and communities we support.
- We use social media in a way that reflects our values and supports our charitable purpose.
- We follow UK law and Charity Commission expectations.

14.2. Legal Responsibilities

Social media activity is subject to UK law. Content posted online can be seen widely, including outside the UK. You may be breaking the law if you post or share content that includes:

- **Harassment** - repeatedly contacting or targeting someone.
- **Menacing or threatening behaviour** - content that could cause fear or imply harm.
- **Grossly offensive comments** - deeply unpleasant or harmful statements.
- **Libel or defamation** - false statements or unsubstantiated rumours that damage someone's reputation.
- **Data protection breaches** - sharing personal information without consent.
- **Copyright infringement** - using images, text, or other materials without permission.

If you are unsure whether something is appropriate, please ask before posting.

14.3. Who Speaks for TDN

TDN has designated spokespeople:

- **Trustees**

Unless you have been formally asked to speak on behalf of TDN, please do not present your views as the charity's official position.

Even when posting on your personal account, if you mention TDN or use our logo, people may assume you are speaking on our behalf. Please take care to avoid confusion.

Volunteers are encouraged to share their experiences, but must do so in line with this policy.

14.4. Using Social Media Safely and Responsibly

- **Protecting Privacy and Safeguarding**
    - Do not share personal information about anyone you meet during visits (e.g., names, addresses, health details).
    - Never post images or stories involving children or vulnerable adults without clear, informed consent from the individual or their parent/guardian/carer.
    - Remember that some individuals may not be able to give consent due to illness, disability, or cognitive impairment.
    - Do not share information that could put someone at risk (e.g., details about someone being alone, security issues, or financial matters).
- **Protecting TDN's Reputation**
    - If you refer to TDN, make clear that your views are your own unless you are an authorised spokesperson.
    - Use a warm, respectful tone that reflects TDN's values.
    - Avoid posting anything that could be interpreted as offensive, discriminatory, or disrespectful.

- Do not use TDN's logo or branding without permission.

- **Staying Professional**
  - Speak in the first person and be yourself, but remain courteous and constructive.
  - Avoid using emojis or casual shorthand when discussing serious matters.
  - Avoid "shouting" online (e.g., excessive capital letters, bold text, or multiple exclamation marks).
- **Thinking Before You Post**
  - Once something is online, it can be difficult to remove.
  - Consider how your post might be interpreted by people from different backgrounds or cultures.
  - If you are unsure whether something is appropriate, ask a trustee or the Office Manager for guidance.
- **Political Neutrality**

TDN is a politically neutral charity. Volunteers and trustees must not use TDN's name, logo, or platforms to support or oppose any political party or candidate.

- **Ethical Considerations**
  - Avoid posts that appear to endorse harmful or inappropriate behaviour (e.g., excessive drinking, smoking).
  - Always portray beneficiaries, volunteers, and therapy dogs with dignity and respect.
  - Do not share distressing, explicit, or inappropriate content.
- **Copyright and Use of Images**
  - Only use images you have permission to share.
  - Crowd photos at public events are usually acceptable, but images focusing on identifiable individuals require consent.
  - Always obtain permission before posting images of children or vulnerable adults.
- **Avoiding Offensive Content**

Never post content that includes:

  - Extremist views
  - Sexism, racism, homophobia, transphobia
  - Discriminatory comments about disability, mental health, religion, ethnicity, or any minority group
  - Pornographic or distressing imagery
  - Swear words or derogatory language

A simple test:

  - If you wouldn't say it to someone's face, don't post it.
  - If you wouldn't want a family member to read it, don't write it.

14.5. Responding to Others Online

- **Abusive or Harmful Posts**

Some people may try to provoke or upset you online.

  - Do not engage with abusive behaviour.
  - You can block accounts, report abuse using platform tools, or seek advice from TDN.
  - If you believe a crime has been committed, report it to the police.

- **Genuine Concerns or Complaints**

Not all criticism is trolling. If someone raises a genuine concern:

  - Respond politely and focus on the issue, not the person.
  - Offer constructive information or a solution where appropriate.
  - If needed, direct them to TDN's formal complaints process.

14.6. Moderation of TDN's Social Media Channels

TDN aims to create a welcoming, respectful online space. We encourage open discussion, even when views differ. We do not remove posts simply because they are critical, provided they are lawful and respectful.
We will remove posts that:

- Break the law
- Breach safeguarding or privacy
- Are offensive, discriminatory, or contain hate speech
- Include swear words or derogatory comments
- Are irrelevant to TDN's work or the conversation
- Pose a risk to individuals or the charity

We may also block users who repeatedly post inappropriate content or report them to relevant authorities.

14.7. Take-Down Process

- The TDN Trustees and Operations Team is authorised to remove posts that are clearly unacceptable or may be unacceptable.
- Any request to remove a post will be handled through TDN's complaints or relevant policy.
- Before removing a post, a screenshot or otherwise record the content should be retained for our records.

9. Support and Advice

If you are unsure about posting something, or need help dealing with an online issue, please contact:

- A Trustee
- The Operations Team
- Your Regional Lead

We are here to support you.

15. Volunteer Fundraising Policy

Therapy Dogs Nationwide is grateful to every volunteer who chooses to raise funds to support our work. This policy explains how volunteers can safely and responsibly organise fundraising activities "in aid of" TDN. It is designed to be clear, supportive, and easy to follow.

This policy applies to all voluntary fundraising carried out by supporters and volunteers. It does not apply to trustee-led or centrally organised fundraising campaigns.

15.1. Roles and Responsibilities

- **Trustees**
    - Set the strategic direction for fundraising.
    - Ensure TDN complies with charity law, the Fundraising Regulator's Code of Practice, and relevant regulations.
    - Approve fundraising policies and oversee risk management.
- **Operational Team**
    - Provide guidance, resources, and support to volunteers.
    - Offer advice on safe and appropriate fundraising methods.
    - Process donations, Gift Aid forms, and financial records.
- **Volunteers and Supporters**

When you choose to fundraise for TDN, you agree to:

- Follow this policy and any instructions provided by TDN.
- Organise your activity independently and safely.
- Describe your activity as "in aid of Therapy Dogs Nationwide".
- Cover any costs involved in your activity unless TDN has agreed otherwise.
- Ensure a parent or guardian takes responsibility if you are under 18.

15.2. Planning Your Fundraising Activity

- **Keeping People Safe**

Volunteers must take reasonable steps to protect the wellbeing of everyone involved. This includes:

- Choosing a safe venue.
- Ensuring dogs are comfortable, supervised, and never placed in stressful situations.
- Following TDN's safeguarding principles when children or vulnerable adults are present.
- Having a responsible adult present if the organiser is under 18.

- **Managing Risk**

Before your activity:

- Consider any risks such as weather, crowding, dog welfare, or equipment.
- Put simple measures in place to reduce those risks.
- Contact TDN if you are unsure about safety or legal requirements.

- **Legal Requirements**

Some activities require licences or permissions, such as:

- Raffles or lotteries.
- Selling alcohol.
- Street collections.

Volunteers must comply with relevant laws and obtain any required permissions.

15.3. Handling Money and Donations

- **Paying In Funds**

All money raised must be sent to TDN as soon as possible after your event, following the instructions provided by the operational team. Volunteers should not deduct costs unless TDN has agreed to this in advance.

- **Gift Aid**

Gift Aid allows TDN to claim basic-rate tax on eligible donations. Volunteers should:

  - Encourage donors to complete a Gift Aid declaration if they are UK taxpayers.
  - Use TDN's official Gift Aid forms.

15.4. Data Protection and Privacy

TDN will use the information you provide to:

- Discuss your fundraising activity.
- Support you during your event.
- Contact you about TDN's work if you have opted in.

All personal data is handled according to UK GDPR, the Data Protection Act 2018, and TDN's Data Protection Policy.
Volunteers must:

- Only collect personal information when necessary.
- Keep any personal data secure.
- Never share personal data outside TDN.

15.5. Photos, Videos, and Use of Images

TDN welcomes photos and videos from fundraising activities. To ensure consistency and safety:

- **Uniform and Presentation**

Images submitted for TDN use must show:

  - Dogs in TDN collar and lead, bandana and/or slip coat.
  - Volunteers in TDN polo shirt or hoodie, with black trousers or skirt and black shoes.
  - The volunteer holding the dog's lead.

- **Consent**

By sending images to TDN, you confirm:

  - Anyone featured prominently is aged 16 or over.
  - They have given consent for their image to be used for TDN's charitable purposes.

15.6. Behaviour and Conduct During Fundraising

TDN volunteers represent the charity and its values. We ask all fundraisers to:

- Be polite and respectful at all times.
- Avoid pressuring anyone to donate.
- Stop fundraising if someone clearly indicates they do not wish to engage.
- Never smoke, vape, drink alcohol, or take recreational drugs while wearing TDN-branded clothing.
- Avoid causing obstruction or nuisance.
- Treat all venues and public spaces with respect.
- Avoid approaching people who are working or carrying out official duties.

TDN may ask a volunteer to stop an activity if it risks the charity's reputation.

15.7. Safeguarding Considerations

Fundraising often takes place in public spaces. Volunteers should:

- Be mindful of children and vulnerable adults.
- Avoid situations where dogs may be overwhelmed or unsafe.
- Report any safeguarding concerns to TDN immediately.

15.8. Support From TDN

TDN is here to help. Volunteers can contact the operational team for:

- Advice on planning an event.
- Guidance on legal requirements.
- Help with promotional materials.

- Support with paying in funds.

16. Volunteer Policy

Volunteers are at the heart of Therapy Dogs Nationwide (TDN). This policy explains how we work together, what volunteers can expect from us, and the responsibilities that help keep everyone safe. It is designed to be clear, supportive, and accessible for all volunteers, operations team, and trustees.

16.1. How TDN Is Organised

Understanding how decisions are made helps everyone feel confident and supported.

- **Trustees**

Trustees are volunteers who oversee the charity. Their responsibilities include:

  - Setting TDN's strategic direction and ensuring we meet Charity Commission requirements.
  - Approving policies, safeguarding standards, and risk management approaches.
  - Ensuring volunteers are supported through clear processes, training, and communication.
  - Overseeing finances, insurance, and legal compliance.

Trustees do not manage day-to-day volunteer activity.

- **Operational Team (Contractors, Coordinators, Regional Leads, Approved Volunteers)**

These volunteers help run the charity's activities. Responsibilities may include:

  - Supporting new volunteers through induction and local guidance.
  - Coordinating visits, events, and regional activities.
  - Providing practical advice on safety, wellbeing, and dog handling.
  - Acting as a point of contact for questions or concerns.

- **Volunteers**

Volunteers choose how much time they give and which activities they take part in. Volunteers may:

  - Carry out therapy dog visits.
  - Support fundraising or events.
  - Help with administration, communications, or local coordination.

Volunteers are not employees and are not subject to performance management. Expectations are supportive, reasonable, and focused on safety and wellbeing.

16.2. Volunteering With TDN

- **What Volunteers Can Expect From Us**

TDN will:

  - Provide a warm welcome and clear induction.
  - Offer guidance on safe visits, safeguarding, and data protection.
  - Treat all volunteers with respect, kindness, and fairness.
  - Provide appropriate insurance for authorised activities.
  - Keep administration simple and proportionate.
  - Recognise and appreciate volunteers' contributions.

- **What TDN Asks of Volunteers**

To keep people and dogs safe, volunteers are asked to:

  - Follow TDN's policies and guidance.
  - Carry out visits only when authorised and appropriate for their dog.
  - Communicate any concerns promptly.
  - Respect confidentiality and data protection principles.
  - Uphold TDN's values of kindness, professionalism, and inclusivity.

These expectations are not contractual and do not create employment rights.

- **Volunteer Roles**

TDN volunteers contribute in many ways. Examples include:

- **Therapy Dog Visiting:** Providing safe, positive interactions in hospitals, schools, care homes, and community settings.
- **Fundraising:** Helping raise funds to support our work.
- **Awareness & Events:** Representing TDN at shows, talks, or local activities.
- **Operational Support:** Assisting with administration, communications, or regional coordination.

Volunteers choose roles based on their interests, skills, and availability.

16.3. Safeguarding and Safety

TDN works with vulnerable adults, children, and community groups. Safety is everyone's responsibility.

- **Safeguarding**

Volunteers must:

- Follow TDN's safeguarding guidance.
- Report any safeguarding concern immediately to a trustee or designated safeguarding lead.
- Never share personal contact details with service users.
- Ensure interactions remain professional and appropriate.

- **Risk Management**

Before each visit, volunteers should consider:

- Whether the environment is safe for their dog and the people present.
- Whether their dog is comfortable, healthy, and suitable for the visit.
- Any risks relating to infection control, mobility, or behaviour.

Volunteers may decline or stop a visit at any time if they feel it is unsafe.

- **Health & Safety**

TDN will provide clear guidance on safe visiting practices. Volunteers should:

- Follow local instructions from staff at the venue.
- Use good judgement when handling their dog.
- Report any incidents or near misses to TDN.

16.4. Data Protection (GDPR)

TDN handles personal information carefully and lawfully.

Volunteers must:

- Keep any personal information they receive secure and confidential.
- Use information only for authorised TDN purposes.
- Avoid storing personal data unnecessarily.
- Report any data concerns to a trustee.

TDN will provide basic GDPR guidance during induction.

16.5. Recruitment and Induction

TDN welcomes volunteers from all backgrounds.

- **Recruitment**

Recruitment may include:

- An application form.
- A temperament assessment for the dog.
- Basic checks to ensure suitability for visiting roles.

- **Induction**

All volunteers receive:

- Information about TDN's values, policies, and expectations.
- Safeguarding and data protection guidance.
- Practical advice on safe visits and dog wellbeing.

- **Recognition and Appreciation**

TDN values every volunteer. Recognition may include:

  - Welcome messages or certificates.
  - Badges or long-service acknowledgements.
  - Sharing positive stories on social media or newsletters.
  - Informal thanks from trustees, coordinators, and fellow volunteers.

Recognition is always thoughtful and based on what volunteers genuinely value.

16.6. Insurance

TDN provides appropriate insurance for authorised volunteer activities.

Volunteers using their own vehicles must ensure their insurance includes business use. TDN cannot reimburse personal items lost or damaged unless caused by negligence.

16.7. Equal Opportunities and Inclusion

TDN is committed to equality, diversity, and inclusion. We welcome volunteers of all backgrounds and will make reasonable adjustments to support participation.

Bullying, harassment, or discrimination will not be tolerated.

16.8. If There Is a Concern About a Volunteer's Conduct

If a volunteer's behaviour or actions raise concerns:

- A trustee will discuss the issue with the volunteer.
- Support or guidance may be offered.
- Serious or repeated issues may lead to ending the volunteer relationship.

Volunteers may appeal in writing to another trustee within 10 days.

17.Whistleblowing Policy

Therapy Dogs Nationwide (TDN) is committed to maintaining the highest standards of safety, kindness, integrity, and professionalism across all our activities. We want every volunteer, trustee, coordinator, and partner organisation to feel confident raising concerns when something does not seem right.

This policy explains:

- What whistleblowing is
- What types of concerns should be raised under this policy
- How to raise a concern
- How TDN will respond
- The support and protection available to whistleblowers

17.1. What Is Whistleblowing?

Whistleblowing is when someone raises a concern about wrongdoing that affects others and is in the public interest. It is different from a personal complaint or disagreement.

A whistleblowing concern may relate to:

- Criminal activity or a breach of the law
- Fraud, theft, or misuse of charity funds
- Safeguarding concerns involving adults or children
- Serious health and safety risks
- Abuse, bullying, harassment, or intimidation
- Corruption or improper conduct
- Abuse of authority
- Any behaviour that puts the public, volunteers, or beneficiaries at risk
- Any action that could seriously damage TDN's reputation or charitable purpose

You do not need to prove wrongdoing. You only need to raise the concern honestly and provide information you have.

17.2. What Is Not Whistleblowing?

Some issues are better handled through other routes:

- **Volunteer concerns about their own experience** (e.g., feeling unsupported, disagreements, or communication issues) should be raised through TDN's *Complaints or Volunteer Support* processes.
- **Operational matters** (e.g., scheduling, visit arrangements, or local coordination issues) should be raised with your Regional Coordinator or relevant volunteer lead.

If you are unsure which route to use, you can still contact a Trustee for guidance.

17.3. Who Can Raise a Whistleblowing Concern?

Anyone connected to TDN may raise a concern, including:

- Volunteers
- Trustees
- Operations Team
- Regional leads
- Partner organisations
- Members of the public who witness concerning behaviour during a TDN activity

17.4. Safeguarding and Data Protection

Some whistleblowing concerns may involve sensitive information. TDN will:

- Treat all concerns seriously and with care
- Follow safeguarding procedures where children or adults at risk may be affected
- Handle personal data in line with UK GDPR

- Only share information with those who need it to take appropriate action

17.5. How to Raise a Concern

If you believe something is seriously wrong, please report it as soon as possible.

- **Who to Contact**

Concerns should be reported to a TDN trustee. You may contact:
Trustees@tdn.org.uk or Help@tdn.org.uk
If you feel unable to contact a trustee directly, you may speak to a member of the Operations Team or Regional Coordinator, who can pass the concern to the trustees on your behalf.

- **How to Report**

You may raise your concern:

  - By email
  - In writing
  - By phone
  - In person (if appropriate and safe)

Please include as much detail as you can, such as:

  - Your name and preferred contact method
  - What happened, when, and where
  - Who was involved or witnessed the incident
  - Any supporting information you have

You will never be asked to investigate the matter yourself.

17.6. Confidentiality and Anonymity

TDN will make every effort to protect your identity if you request confidentiality. Information will only be shared when necessary to address the concern.
You may raise a concern anonymously. However:

- Anonymous concerns can be harder to investigate
- Trustees may not be able to update you on the outcome
- Some details may be impossible to verify without further information

TDN will still consider anonymous concerns where possible.

17.7. How TDN Will Respond

When a concern is raised, TDN will:

- Acknowledge receipt of the concern
- Assess the information provided
- Decide what action is needed
- Carry out an appropriate investigation
- Take steps to address any confirmed issues
- Provide feedback to the whistleblower where possible

Actions may include:

- Safeguarding referrals
- Internal review
- Contacting partner organisations
- Reporting to external authorities (e.g., Charity Commission, police)
- Implementing changes to improve safety or governance

Trustees are responsible for overseeing whistleblowing concerns. Operational team may be asked to support an investigation only where appropriate and safe.

17.8. Protection for Whistleblowers

Individuals who raise concerns in good faith will not be treated unfairly or disadvantaged for doing so. This includes volunteers, trustees, and members of the public.
No action will be taken against anyone who raises a concern honestly, even if it is not upheld.
However, deliberately false, malicious, or vexatious allegations may result in appropriate action by the trustees.

17.9. Support and External Advice

If you are unsure whether to raise a concern, or feel nervous about doing so, you may seek independent advice.

- Protect (formerly Public Concern at Work) A UK charity offering confidential whistleblowing advice. Website: protect-advice.org.uk Phone and email details available on their website.
- You may also contact the Charity Commission if you believe serious wrongdoing is occurring within a charity.