

JUNIOR LEAGUE OF

Operating Policies and Procedures

THE JUNIOR LEAGUE OF LONDON (THE "JLL") IS A REGISTERED CHARITY, A COMPANY LIMITED BY GUARANTEE, AND A MEMBER OF THE ASSOCIATION OF JUNIOR LEAGUES INTERNATIONAL ("AJLI"). THE JLL HAS A WHOLLY-OWNED TRADING SUBSIDIARY, JLL ENTERPRISES LIMITED ("JLLE"). THE

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I. MISSION, VISION, VALUES AND COMMITMENT

A. Mission

The Junior League of London is an organisation of women whose mission is to advance women's leadership for meaningful community impact through volunteer action, collaboration, and training.

B. Vision

Our vision is of a London where each person has the opportunity and means to prosper.

C. Values

Diversity: The Junior League welcomes all women who value our Mission. We are committed to inclusive environments of diverse individuals, organisations, and communities.

Collaboration: We believe lasting societal change is achieved through both collaboration and meaningful disagreement. Living the value of collaboration inspires us to accomplish more together.

Community: We believe a strong sense of community is essential to human well- being. Living the value of community provides a foundation of inclusion, which allows us to make a greater impact on the world around us.

Empowerment: We believe that the empowerment of women is a necessary requirement to create positive, lasting societal change. Living the value of empowerment fosters trust and confidence in each other.

Leadership: We believe in the unique power of women's leadership abilities to transform communities for the better. Living the value of leadership allows us to make a collective difference.

Respect: We believe respect is a fundamental human right. Living the value of respect instils in us an unconditional positive regard for others.

Service: We believe it is through service that we build core relationships with others. Service is the lens through which we decide how we will invest our time and resources. Living the value of service empowers us as catalysts for lasting community change.

D. Commitment

As a reflection of our Mission, Vision, and Values, it is anticipated that each Active member assigned to a committee of the JLL will contribute a minimum of two hours per week, on average, in fulfilment of her JLL membership.

II. POLICIES OF THE ASSOCIATION OF JUNIOR LEAGUES INTERNATIONAL ("AJLI")

The JLL embraces diversity and reaches out to women of all races, religions and national origins who demonstrate an interest in and a commitment to voluntarism. The JLL does not discriminate on the basis of race, religion or national origin.

Only women who comply with the requirements of the AJLI, the JLL's Memorandum and Articles of Association, the JLL's Code of Conduct, and these Operating Policies and Procedures shall be admitted to membership of the Junior League of London. No JLL member shall at any time be a concurrent member of any other Junior League.

All meetings and functions of the JLL shall be held at facilities, which do not discriminate against women or on the basis of race, religion or national origin.

The JLL's books and accounts shall be kept in accordance with generally accepted accounting principles in the United Kingdom and shall be audited or reviewed annually by qualified accountants at the end of each fiscal year.

The JLL will immediately send to the AJLI office evidence of any change in its status as a registered charity in the UK.

III. ORGANISATIONAL STRUCTURE

A. Board of Trustees

The Board of Trustees shall be the governing body of the JLL and shall consist of: (a) the President; (b) the President-Elect "PE"; (c) the Finance Director; (d) the Nominating Director; (e) the Council Vice Presidents "VPs" and (f) up to three At-Large Directors in each JLL fiscal year. If the incoming President and/or President-Elect is not currently on the Board of Trustees, she shall automatically join the Board upon election by the membership, therefore acquiring voting rights.

B. Company Secretary

As a registered company limited by guarantee, the JLL is required to designate an Employee or a member of its Board of Trustees as its Company Secretary. The Company Secretary is responsible for ensuring that the JLL complies with all filing and other requirements imposed on it by Companies House and the Charity Commission. The Company Secretary also has primary responsibility for ensuring that JLL complies with the terms of the Data Protection Act.

The Director of Operations shall serve as the JLL's Company Secretary. In any year in which there is no Director of Operations, this role shall be taken by such other JLL Trustee as the President shall appoint.

The Company Secretary also serves as Corresponding Secretary for matters that relate to AJLI.

C. Executive Committee

The Executive Committee shall be the body responsible for day-to-day management of the organisation, including working toward fulfilling the strategy, as determined by the Board of Trustees. It shall consist of: (a) the President-Elect (b) the Communications Vice President; (c) the Community Vice President; (d) the Fund Development Vice President and (e) the Membership Vice President. The President-Elect shall chair the Executive Committee, or she may delegate this role to another board member.

D. Councils

The JLL's functions shall be divided into four areas known as Councils: Community, Fund Development, Membership and Operations. The Board of Trustees shall determine the composition of committees within each Council. Each Council shall be chaired by a Vice President, with the exception of the Operations Council, which will be chaired by the President. Each JLL committee shall be represented on a Council by the Committee Chair(s) sitting as a member of the Council leadership. 'Champions' will exist within Councils as deemed appropriate by the Council VP. Champions will work on specific issues and will not necessarily be attached to a committee. The President and President-Elect shall be a non-voting, ex-officio member of all Councils.

Each Council will meet at least quarterly, as determined by the Council chair, to (a) review and make recommendations on issues or concerns within the Council's subject area for consideration by the Board of Trustees; (b) coordinate the activities of the Council's member committees; (c) implement the JLL's Strategic Plan as it applies to the Council; (d) serve as the communication link between the Board of Trustees and the members of the Council; and (e) share essential information regarding the activities of the Board of Trustees and other Councils.

IV. OPERATIONS

A. Registered Office

1. Our registered mailing address is Junior League of London, 7 - 14 Great Dover Street, London, SE1 4YR.

B. JLL Office

- 1. The virtual JLL office is staffed Monday to Thursday from 10:00 a.m. until 6.00 p.m.
- 2. The Office maintains a list of possible Central London meeting venues which shall be made available on the Digital Cheetah Members' site under Resources/Useful Information. Councils/Committees are responsible for making their own venue hire arrangements and must ensure they have sufficient budget prior to committing to any costs. Requests to add additional venues to the list or otherwise amend it may be made via the Website Approval Process Members' Area, which is detailed below in Communications: Website section 2b.

C. Employees

- 1. It is the intent of the JLL that each JLL employee shall be paid a fair salary for the job assigned. All employees shall sign a written contract of employment with the JLL upon commencing employment. Salary levels and pay rises shall be determined annually by the Board of Trustees (usually in March/April as part of the budgeting process) based upon the performance of the employee.
- 2. Each employee will agree to annual goals with a mid-year performance review in November and Annual Performance review in May. These reviews will be conducted by the President, with the President-Elect attending the May review. If the P-E has been identified and agreed earlier in the year than the regular slate process, she shall participate in the November review as well. In the absence of a President, the President-Elect will conduct performance reviews. At a minimum, the reviewer shall obtain oral or written reviews of the employee's work from the Board of Trustees.
- 3. Members in good standing are eligible for employment by the JLL.

If a member is hired by the JLL, during her employment she may not serve in a Nominated position (i.e., Placement, Nominating or Board of Trustees), unless the Board of Trustees approves an exception.

- i. In addition, if the employed member is asked to join the Board of Trustees, written permission must also be obtained from the Charity Commission as outlined in our Memorandum & Articles (Memorandum 5, Sub-clause 4c), prior to appointment.
- ii. The employed member may serve as a Committee Chair with permission from the Board of Trustees.

D. Membership Directory

The Membership Directory (roster of members' names and contact details, including e-mail addresses) is for JLL members' use on JLL business only. IT MAY NOT BE USED FOR THE PROMOTION OF ANY ACTIVITY UNRELATED TO THE JUNIOR LEAGUE OF LONDON, NOR MAY IT BE USED FOR PERSONAL GAIN OR MADE AVAILABLE FOR COMMERCIAL OR SOLICITATION PURPOSES. Members' personal details (names and contact details, including e-mail addresses) may not be released to outside individuals or organisations, even in relation to a JLL-related event or activity, unless the member's permission is explicitly received in advance. Infractions of this policy will be brought to the attention of the Board of Trustees and may result in termination of membership.

E. Scheduling Meetings and Events

The office staff, under the direction of the President-Elect, shall maintain a calendar of meetings and events comprising all JLL-related activities, as well as major communications deadlines, and shall be responsible for continuously adding this information to the JLL website. Prior to scheduling new JLL meetings, events or activities, Committee Chairs and/or Council VPs must check the current Calendar to ensure that there is no conflict with any other JLL activities. A request to officially schedule a new activity that involves more than the members of a single committee must then be made to the President-Elect before the activity may be added to the Calendar. The most current version of the JLL Calendar shall always be made available online.

F. General Meetings

- 1. The schedule of General Meetings and their locations is made available to all members in advance and posted on JLL internal communications channels. All members are invited to attend. The posting of this schedule through JLL eCommunications and social media shall constitute notice of the General Meetings as required by the Articles of Association. Pursuant to Article 7, 4 of the Articles of Association, the schedule of General Meetings shall also be delivered to the JLL's auditors by the Company Secretary.
- 2. All Members required to sign in at the start of each General Meeting.
- 3. Pursuant to Article 13, 2, b of the Articles of Association, minutes will be taken of the proceedings at General Meetings if official business is conducted, i.e., if any votes are scheduled to be taken. The Company Secretary shall have primary responsibility for ensuring that this occurs and that copies of all minutes are filed in the JLL office.
- 4. Any JLL member may bring her infant, up to the age of six months, to General Meetings. However, if the infant becomes a distraction, the member must remove the infant from the General Meeting room. Children must be supervised at all times.
- 5. Mobile telephones and other communication devices must be turned off or placed on "silent" during General Meetings.
- 6. Each year, the General Meeting held in May shall be deemed to be the JLL's Annual General Meeting.

G. Council and Committee Meetings

- 1. The schedule of Council and Committee meetings and their locations shall be determined at the beginning of the year and made available to their members in advance.
- 2. Committee and Council Meeting attendance should be recorded in Member Essentials via self-check-in or by the Committee Chair/Council VP.
- 3. Agendas should be shared in advance of the meetings and minutes taken and shared after with the group members.
- 4. Any JLL member may bring her infant, up to the age of six months, to a Council or Committee Meeting. However, if the infant becomes a distraction, the member must remove the infant from the meeting. Children must be supervised at all times.
- 5. Mobile telephones and other communication devices must be turned off or placed on "silent" during General Meetings.

H. Voting at General Meetings

- 1. New, Active and Sustaining Members in good standing and residing in the UK at the time a vote is called may vote on any matter brought to a vote at a General Meeting. Voting on all matters at General Meetings shall be by ordinary resolution; that is, by a simple majority of votes cast, including absentee or proxy ballots, if any. All votes, including absentee and proxy, will be counted at the General Meeting and the vote will be considered closed after votes have been counted at the General Meeting. The Board of Trustees shall determine an appropriate procedure to ensure that only eligible members vote and that each such member votes only once.
- 2. Quorum shall be determined as set forth in Article 9, 2 of the JLL's Articles of Association, specifically, one fifth of the members entitled to vote upon the business to be conducted at the meeting, or one tenth of the total membership at the time, whichever is lesser.
- 3. Notice that a vote will be taken at a General Meeting, including notification and/or a written description of the subject matter of the vote, shall be delivered to all members eligible to vote at least ten days prior to the meeting date. Such notice may be delivered by post, e-mail or such other mechanism as the Board of Trustees shall determine. Additional materials pertaining to the vote may be posted on the JLL website.
- 4. The result of a ballot shall be presented at the General Meeting in which it is taken, and all members shall be notified of the result the next business day after the vote the General Meeting by any method deemed appropriate by the Board of Trustees (eCommunications, Members' area of the website, social media, announcement at a General Meeting, etc.). The vote shall also be recorded in the minutes of the next meeting of the Board of Trustees.
- 5. Proceedings at all JLL General Meetings shall be governed by the current edition of Robert's Rules of Order, New Revised, unless inconsistent with the JLL's Memorandum or Articles of Association or these Operating Policies and Procedures. Additionally, protocols for any business conducted virtually will be in accordance with the Virtual General Meeting Protocols set forth in **Appendix J**. See Articles 13 through 18 of the Articles of Association.

I. Voting by Absentee or Proxy Ballot

- 1. Any notice sent to members regarding a vote to be taken at a General Meeting shall state how a proxy voting form may be obtained and the process which may be used by members eligible to vote but unable to attend the meeting. The stated deadline for completing this process shall be not less than ten days after the date the notice is sent to members.
- 2. Each proxy voting form must be signed by the member voting and shall be revocable by the member prior to the vote. Any proxy voting form which is not signed, or which is not returned prior to the deadline specified in the notice shall be deemed void. If a member attends the meeting where the vote takes place after having submitted a proxy voting form, she must either recuse herself from the vote or notify the President prior to the meeting that she wants her proxy voting form to be voided.
- 3. The President shall designate a member of staff or a member of the Board of Trustees who will independently count the proxy ballots and present their report to the President prior to the General Meeting at which the vote is to be taken. If a motion to be voted on is materially amended at the meeting, the proxy ballots shall be deemed void. The President shall determine whether any amendment is material for this purpose. Proxies on any amended or further business may still be voted by the proxy holder if such arrangements are made available and consent has been provided in advance.

J. Voting by Electronic Ballot (eVote)

- 1. Any matter which could properly be brought before the voting members of the JLL at a General Meeting may instead be voted on by electronic ballot. Members must be given no less than ten days from sending of the ballot materials to cast their electronic ballot online. The Board of Trustees shall determine an appropriate procedure to ensure that only eligible members vote and that each such member votes only once.
- 2. Each electronic ballot shall be revocable by the member prior to the specified deadline. Any electronic ballot which is not cast online prior to the specified deadline shall be deemed void. Quorum for a vote by electronic ballot shall be determined in the same manner as that for votes taken at a General Meeting (see above under "Voting at General Meetings"). Voting on all matters by electronic ballot shall be by a simple majority of votes cast.
- 3. The President shall designate a member of staff or a member of the Board of Trustees who will independently verify the electronic ballots and present their report to the President (except with respect to votes for slated positions as described in subsection 4 below). The result of each electronic ballot shall be recorded in the minutes of the next meeting of the Board of Trustees, and members shall be notified of the result the next business day after the vote has closed by any method deemed appropriate by the Board of Trustees (eCommunications, Members' area of the website, social media, announcement at a General Meeting, etc.).
- 4. In the case of votes for slated positions (see "Membership Council Board of Directors; Placement & Transfers and Nominating Committees"), the electronic ballots shall be processed and counted by a member of staff or the Nominating Committee. The slate ballots shall not be required to be signed and the Nominating Committee will put in place appropriate mechanisms to ensure voting confidentiality and to ensure that only eligible members vote. The result of the ballot shall be announced to the membership the next business day after a vote has closed. Members shall be notified of the result by any method deemed appropriate by the Board of Trustees (eCommunications, Members' area of the website, social media, announcement at a General Meeting, etc.). The result will also be recorded in the minutes of the next meeting of the Board of Trustees. The number of votes for or against the slate shall not be disclosed.

K. Strategic Plan

To ensure focus on and continuity in the organisation and charitable activities of the JLL, the Board of Trustees shall serve as the authors and stewards of Strategic Plan. The Strategic Plan shall be presented to the members at a General Meeting, or otherwise made available to them, by no later than 30 September. The plan shall be reviewed annually with a major review / refresh occurring at least every 5 years. The next review is scheduled to take place no later than the 2024-2025 League Year.

L. Data Security

The JLL will secure all sensitive data and store minimum and necessary data as required to conduct operations as outlined in the <u>Information Security Agreement (ISA)</u>. The JLL will follow all relevant, current data protection rules and legislation. All employees must comply and sign the ISA. All members must adhere to the guidelines contained with the ISA. The ISA will be reviewed at a minimum, annually, and updated as required throughout the year, as new rules, guidance, or legislation come into effect.

V. COMMUNICATIONS

A. Purpose

The Communications Council is responsible for internal communications that keep the JLL membership informed, as well as external communications that promote the JLL in the community.

B. External Communications

- 1. The JLL President or her designee will serve as the official media spokesperson for the organisation. A JLL member may only initiate contact with the media with prior approval from the President and the Communications Vice President.
- 2. The Communications Vice President, or a member of the Communications Council designated by the Communications Vice President, will act as the public relations liaison with the media. All public statements and communications directed to the media must be approved by the Communications Vice President with review by the President.
- 3. All external promotional materials concerning the League must be approved by the President-Elect and the Communications Vice President, prior to use. Examples of promotional materials include, but are not limited to, flyers, advertisements and programme, sales letters, and brochures for Living in London: A Practical Guide, letters or e-mails requesting in-kind donations for community projects and recruitment advertisements for new members. This pertains to all channels for promotion, including but not limited to, print, email, electronic and social media. External communications materials that have been pre-approved in this manner, such as form letters, are exempt from this review.

C. eCommunications

- 1. The purpose of eCommunications is to provide timely and concise announcements to the JLL membership. The JLL Journal is distributed approximately bi-weekly; Snapshot is distributed approximately quarterly; and other internal communications (e.g., Sustainer Newsletter, eFlashes are distributed) on an ad-hoc basis. The JLL office staff, the Communications Vice President, the President, and the President-Elect are responsible for drafting and distributing The JLL Journal, based on the calendar of events listed on the website. Council Chairs are responsible for approving dates added to the calendar on the website (but must seek approval from the President-Elect regarding all-member events and events with a cost attached to them. Council Chairs are responsible for notifying the Communications Vice President if they would like to include additional announcements. The JLL Journal must be approved prior to distribution by one of the following: the Communications Vice President, or the President-Elect.
- 2. Announcements for The JLL Journal must be submitted to the Communications Vice President, in the format prescribed, by 12pm on the Saturday before each issue is distributed. Failure to follow such format guidelines may result in an announcement not being included in The JLL Journal.
- 3. JLL members who have provided an email address to the JLL office staff and who have consented to being contacted by the JLL in this manner are included on the eCommunications distribution list. JLL members who do not wish to receive eCommunications may contact the JLL office staff.
- 4. The JLL will make every effort to ensure that all eCommunications are free from computer viruses and that email addresses are not disclosed to the mailing list. The JLL accepts no liability, nor will it compensate for any damages incurred, should either event occur.

D. Website (www.jll.org.uk)

- 1. The purpose of the website is two-fold: Public Area To provide information to the public, including community partners, prospective members, and potential sponsors, about the JLL; and Members' Area
 - To provide a secure area where members of the JLL can access member specific information, including membership directories, an e-mail facility, forms, forums, committee information, etc.
- 2. All content on the website should be reviewed by the Communications Vice President and/or the Office for relevance and accuracy a minimum of once per quarter. Council chairs are encouraged to review their respective sections as part of their Council meetings and inform the Communications Council of any changes. Submissions for the website follow the approval processes outlined below and must conform to the standards set by the JLL.
 - a. Website Approval Process Public Area. The public pages of the website shall include basic information about the JLL, its community programmes, fundraisers, and membership. It shall not contain any personal contact information for JLL members or notices of member-only events, such as General Meetings.

To post information on the public pages of the website, content must be sent to and approved by the Communications Vice President and President-Elect. The President shall receive prior notification before major changes to the public area are posted.

- b. Website Approval Process Members' Area. To post content on the members' pages of the website, content must be sent to and approved by the Communications Vice President and/or Office staff. Committee Chairs are responsible for notifying the office staff when content should be removed from the site.
- c. Link Exchange. Members must obtain approval with the Communications Vice President before offering a link to an external website from the JLL website or before requesting a link to the JLL website from a third-party website to ensure that association with the organisation would not damage the reputation of the JLL.

E. Advertising and Announcement Guidelines for JLL Communications

- 1. **Advertisements vs Announcements.** Advertisements are from organisations that pay a fee to the JLL to solicit JLL members. Announcements are from organisations that do not pay a fee to be listed in JLL publications and are published with the intent of informing JLL members about services, opportunities, or upcoming events in the community.
- 2. Advertising Policies. Advertisements are permitted in The JLL Journal and Living in London. Advertisements in other JLL publications may be permitted as deemed appropriate by the Board of Trustees. Advertisements on the JLL website or in eCommunications may be proposed by the Communications Vice President and may be permitted with Board approval. Committee Chairs must consult the Communications Vice President before promising any 'quid pro quo' agreement with funders or donors. If the matter cannot be resolved by the Communications Vice President, it should be brought before the Board of Trustees.

In order to advertise in a JLL publication, advertisers must satisfy the following criteria:

- a. Be a reputable organisation or business with which the JLL would be proud to be associated;
- b. Must provide a potential benefit to the JLL, its members or its projects; and
- c. Not be in conflict with the JLL's mission.

The JLL accepts no responsibility for vetting the quality of goods or services provided by its advertisers.

With respect to advertisements, the JLL Communications Council:

- a. Reserves the right to edit all advertisements submitted for publication;
- b. Reserves the right to refuse any advertisement not deemed acceptable, received after the specified deadline, or not paid for in full prior to publication;
- c. Cannot guarantee the location or placement of an advertisement, unless the advertiser specifically pays for a particular location or placement;
- d. Will group advertisements together in publications and channels at its discretion;
- e. May charge advertisers additional amounts if advertisements are not provided in the specified digital format to the JLL; and
- f. Accepts no responsibility for errors submitted in advertising materials.
- 3. **Announcement Policies.** Announcements are permitted in eCommunications, on the JLL website, and on JLL social media. The Board of Trustees may approve announcements being placed in other JLL publications and channels.

In order to post an announcement in any JLL communication, organisations and their announcements must:

- a. Be a well-known and reputable non-profit organisation, or alternatively a for-profit organisation promoting an event where the proceeds will go directly to charity, with which the JLL would be proud to be associated;
- b. Neither be in conflict with the JLL's fundraising or ongoing volunteering opportunities, e.g., event dates cannot conflict with JLL events, nor solicit the JLL membership to fundraise or volunteer for another organisation on an ongoing basis;
- c. Be one-off events or giving opportunities, i.e., ongoing volunteering or giving opportunities will not be accepted; and
- d. Not be political in nature.

With respect to announcements, the JLL Communications Council and/or the JLL office: a. Reserves the right to edit all announcements submitted for publication;

- b. Reserves the right to refuse any announcement not deemed acceptable or received after the specified deadline;
- c. Will only include announcements on a space available basis and cannot guarantee the location or placement of an announcement; and
- d. Will group announcements together in communications vehicles at its discretion.

Announcements should be submitted to the office staff and the Communications Vice President.

F. Social Media (Facebook, Instagram, Twitter, LinkedIn, YouTube, Pinterest, etc)

- 1. The purpose of the JLL's social media platforms is to provide a means of instant communication with and to encourage more interaction among current members, sponsors, potential members, and community partners.
- 2. The Communications Council is responsible for the day-to-day management of the JLL's social media platforms and profiles. JLL leaders and members are also encouraged to make frequent posts on JLL social media platforms.
- 3. As social media is a fast-paced world, posts by the office staff and JLL members are on an honour system. Posts made by members or the office staff on public social media platforms should be mission-driven, reflect well on the JLL and follow our Operations Policies and Procedures as outlined in the Announcements Policies.
- 4. Similarly, the office staff or JLL members may proactively post JLL news on the platforms of other organisations, provided they are like-minded organisations and that association with the organisation would not damage the reputation of the JLL.

G. Style Guide and Photographs

- 1. All JLL communications shall be written in UK English, using UK English spelling, punctuation, time, and date formatting.
- 2. All JLL communications shall conform with the guidelines in the JLL Communications Handbook and AJLI's Identity Standards (available from the Operations Council), unless previously discussed with and approved by the Communications Vice President and the President-Elect. These Identity Standards provide guidelines on, among other things, choice of typeface and proper use of the JLL logo.
- 3. Photographs of children used on the JLL website, social media or any JLL printed materials may be used only with the permission of the appropriate Council VP or Communications Vice President, who shall be responsible for ensuring that the parent or guardian of each such child has signed a release permitting the photograph to be published by the JLL. The JLL shall abide by the procedures put in place by the community partner directly responsible for the children regarding the format, and disclosure to the JLL, of such releases. In order to minimise the risk that photographs of children are used without permission, members should refrain from uploading photographs to SmugMug, etc. without signed permission forms.

VI. COMMUNITY

A. Community Focus

1. The Junior League of London aligns its community activities around a central Community Focus in order to maximise impact in a particular area. The Community Focus shall be reevaluated at least once every eight years by the Board of Trustees, led by the Community VP, in order to determine whether the current Community Focus should remain in effect or whether a new Community Focus should be developed. At a minimum, such evaluation shall include a review of community need, impact of the current focus and membership preferences.

The current Community Focus, Poverty, was approved by the membership during the 2007-2008 fiscal year and was re-evaluated by the 2022-23 Board of Trustees. Poverty was approved as the Community Focus through 2031-32, and thus, will need to be re-evaluated during the 2030-31 League Year.

- 2. If it is determined that a new Community Focus should be selected, the Community VP and the Community Council (with a suggested taskforce, specifically designated for this project) shall develop alternative(s) for a new Community Focus, using the criteria set forth in the preceding paragraph. The Community VP, and aforementioned taskforce, shall present the new Community Focus alternatives to the Board of Trustees. After obtaining the approval of the Board of Trustees, the Community Council shall present the new Community Focus alternative(s) to the membership at a General Meeting, during or after which the membership shall vote to approve the new focus from among the options presented.
- 3. The JLL has a two-pronged approach to its community outreach:
 - a. Long term community projects; and
 - b. Short term community projects

B. Long Term Community Projects

- 1. **Project Criteria.** Projects must be compatible with the mission of the JLL and meet a real community need within the scope of the JLL Community Focus. Projects shall provide constructive opportunities for training and development of JLL volunteers. JLL involvement in a project must be realistic in terms of the Strategic Plan, membership interest and JLL resources, both volunteer and financial.
- 2. Project Selection/Adoption. At the direction of the Board of Trustees, the Community Council or designated task force shall research and develop potential new projects within the Community Focus. The Council shall present a formal project proposal to the Board of Trustees for each project, which shall include the following components: project goals and objectives; project details including a timeline for development and execution during the first year; JLL volunteer responsibilities and commitments; a description of placement opportunities; JLL volunteer training; potential community partners and a description of their roles and responsibilities; project budget including potential funding sources; risk assessment; and impact measures.
 - a. The Board of Trustees shall consider the proposal in the context of the project criteria set forth in Section 1 above. If approved by the Board of Trustees, the Community

Council or designated taskforce shall present the project to membership at a General Meeting or via an eVote, at which point the membership shall vote on whether to approve the project.

- b. Upon adoption of a project, the Community Council or designated task force shall draft a written contract/letter of agreement between the JLL and individual community partners shall be drafted and signed by all parties delineating roles and responsibilities including, but not limited to, a description of the project and purpose, the duties and responsibilities of all parties, the resource commitment expected of each party including administrative assistance, volunteers and funds of all parties, a timetable for the life of the project, the photo release and DBS checking procedures to be used, and a statement delineating each parties' responsibility for liability and insurance. As with all other JLL contracts, this will be signed by the President-Elect on behalf of the JLL. If the President-Elect is away from London for an extended period, the President may sign in her place. If the project involves children, the JLL's Child Protection Policy (Appendix C) shall be attached to this contract/letter agreement for the information of the community partner(s).
- c. Once a project is approved, it is the responsibility of the Placement & Transfers Committee, working with the Community Council or designated task force, to ensure that the project is properly staffed.
- 3. **Project Evaluation.** The committee responsible for each long-term project shall be responsible for developing a one-year plan and annual budget. The committee will put in place appropriate targets and measures to assess the progress and success of the project on an ongoing basis. Each committee shall monitor the progress of its project(s), including relationships with community partners, and provide periodic updates to the Community VP. In turn, the Community VP will update the Board of Trustees on the current status of all community projects at least once each year. A new project proposal must be submitted to the membership for approval if the Board of Trustees determines that a project's goals and/or resources have changed significantly from those originally approved.
- 4. **Project Termination/Transition**. If, as a result of the evaluation process, it is determined that a project no longer meets the JLL project criteria or that it has matured and is ready for handover to the community, the project shall be terminated or transitioned. The steps for terminating or transitioning a project are: the creation of a written plan by the committee chair with the help of the Community VP; the approval of the plan by the Board of Trustees; a presentation to the membership regarding the intent to terminate or transition the project, a membership vote on the proposal; and implementation of the plan, if it is passed.

C. Short Term Community Projects

- 1. Short term community projects are designed to:
 - a. provide JLL members the opportunity for hands-on community experience with minimal time commitment;
 - b. respond to specific and varied needs of the community that can be addressed in a single session;
 - c. involve the JLL in and raise members' awareness of London's neediest areas beyond the JLL long-term project areas and/or beyond the JLL's Community Focus; and
 - d. provide broader awareness and understanding of the JLL within the voluntary/charitable sector, beyond our ongoing community partners.

- 2. One-off projects/shifts are designed according to the following guidelines:
 - a. the end beneficiaries must be individuals in need in the London community;
 - b. the volunteer work must have an impact on the community and an impact on the volunteer;
 - c. the volunteer work must not be solely for the purpose of fundraising;
 - d. must be at least a 3-hour time commitment (however, the 3 hours can be accumulated in an agreed-upon timeframe, such as with Community Partner, City Gateway's Literacy Lunches).
 - e. should be scheduled at least once per month and at varying dates, places, and times (days, evenings, weekdays, weekends, areas of London) throughout the year so that all members may participate. The organiser(s) shall endeavour to give as much advance notice as possible of upcoming shifts; however, as last-minute opportunities do occur, members are reminded to check eCommunications and the Volunteer Calendar on the JLL website for the most up-to-date information.
 - f. activity leaders will share the Child Protection Policy (Appendix C) with participants prior to projects/shifts involving children.

D. Partner Agreement

Upon adoption of a new partner, a written contract/letter of agreement between the JLL and individual community partner shall be drafted and signed by all parties delineating roles and responsibilities including, but not limited to, a description of the project and purpose, the duties and responsibilities of all parties, the resource commitment expected of each party including administrative assistance, volunteers and funds of all parties, a timetable for the life of the project, the photo release and criminal records checking procedures to be used, and a statement delineating each parties' responsibility for liability and insurance.

If the project involves children, the JLL's Child Protection Policy (Appendix C) shall be attached to this contract/letter agreement for the information of the community partner(s).

E. Child Protection Policy

The JLL has adopted a Child Protection Policy in the form attached as Appendix C to these Operating Policies and Procedures. All members of the JLL, particularly those working on community projects with children, must familiarise themselves with this policy. Committee leads are strongly encouraged to include the Child Protection Policy as part of their committee training materials at the beginning of each year.

F. Criminal Record Checks

All members working directly with children, specifically those participating as tutors with Colville are required to have their criminal records checked with the Disclosure and Barring Service prior to working their shift. Background checks should be completed within one month of joining a Community Action Team.

It is also recommended that criminal checks are also obtained for the entire Community Action Team and the Board of Trustees, where budget permits.

VII. FINANCE AND RISK

A. Fiscal Policies

- 1. **Fiscal Year.** The JLL's fiscal year shall run from 1 June to 31 May.
- 2. Budget. Each spring, the outgoing Board of Trustees, led by the Finance Director, shall develop a budget for the JLL's succeeding year in consultation with the outgoing Leadership Team. The outgoing Leadership Team shall present itemised budget proposals for their respective budget lines, including a rationale based on prior year's actuals, the current budget to date and anticipated activities of the forthcoming financial year to the Board of Trustees. This budget shall be finalised and approved by the outgoing Board of Trustees by no later than April Board Meeting. This budget shall then be presented to the membership for a vote no later than one week after the April Board meeting. Such vote will occur by electronic ballot unless the budget projects a deficit for the year in an amount greater than 5% of the previous year's total operating budget, in which case the budget must be presented to the membership at a General Meeting and the vote shall take place at such meeting. The General Meeting and corresponding voting can and may, if deemed appropriate by the Board of Trustees, occur virtually. If the budget projects a deficit in an amount lower than 5% of the previous year's total operating budget, it must be presented to the membership for a vote with a detailed memo from the outgoing Finance Director explaining the rationale for the deficit. The JLL shall use "zerobased" budgeting, whereby budgeting shall start from a zero-base, irrespective of the budget of the prior year and all expenditure requests should be justified based on the needs of the organisation for the forthcoming financial year. Budget line items not used in their entirety during a fiscal year will not be rolled over into the next year.
 - a. Members of the Board of Trustees and Committee Chairs are responsible for monitoring their income and expenditures and for keeping committee/council expenses within their respective total budgets and ensuring net income earned meets or exceeds the budget. Except as provided below, the Councils and Committee Chairs may make adjustments between existing line items within their approved budgets provided that the total budgeted amount is not altered. Unless otherwise agreed, the President is responsible for the Board Training and General Meeting budget line items, with all other line items managed by the Council VPs and their respective Committee Chairs. There is a strict approval process for requesting an increase to the approved budget or adding unbudgeted line items, as follows:
 - i. An increase to the approved expenditure budget, a decrease to the approved net surplus of an activity or the addition of an unbudgeted line item exceeding £100 must receive approval of the Finance Director in advance.
 - ii. An increase to the approved budget, a decrease to the approved net surplus of an activity or the addition of unbudgeted line items exceeding £250 must further be approved by the Board of Trustees in advance.
 - iii. An increase to the approved budget or the addition of unbudgeted line items exceeding £15,000 must further be approved by a membership vote in advance.

The bookkeepers are not authorised to write cheques for unbudgeted expenses unless these procedures have been followed.

3. Resource Fund Policy

The Resource Fund was established to meet expenditure of an emergency nature not

foreseen at the time budgets were prepared, that would enhance our Mission.

A significant portion of reserve funds are designated as a resource fund, established to meet expenditures of an emergency or one-off nature which occur unexpectedly or do not fit within the annual budget. When such needs arise, the Board may vote to approve use of the resource fund for sums up to £15,000 per fiscal year to cover emergency, one off or other extraordinary expenses. For extraordinary expenses exceeding £15,000 in a fiscal year, the Board must seek membership approval by vote. If the Board anticipates combined expenditures from the resource fund exceeding £15,000 in the following fiscal year, such expenditures will ideally be presented alongside the annual budget for membership approval.

4. Reserves Policy

The JLL shall at all times keep in reserve an amount of at least one year of the annual average total JLL total Finance and Operations expenses over the last three fiscal years. This policy should be reviewed at least every two years, to account for market conditions and the changing financials/needs of the JLL. Depending on risk appetite and other conditions, it should be reviewed whether investing the reserves into the market or keeping the funds in a savings account is more beneficial for the JLL. Ease of access to funds must be considered.

5. Restricted Funds

Any monetary donation (grant, donation, or sponsorship) that specifies that it should be used for a specific purpose must be evaluated to determine if the funds should be considered restricted and if a new restricted fund is required.

Fund	Purpose	Usage Guidelines
Holiday Hampers	Monies spent from the fund directly support Holiday Hampers program	Approval from the Community VP and the Finance Director
Scholarship Fund	Advance the leadership skills of women in the community by providing financial assistance to members seeking to strengthen their professional skills and personal development. Priority will be given to members with the greatest financial need who also demonstrate the values of the JLL.	OPPs Appendix F: Dues Scholarship Fund Policy
LBDI Covid	Monies must be spent to directly support Community Programming to combat Poverty.	Approval by the Community VP and the Finance Director
Children's Literacy	Monies must be spent to directly support Children's Literacy.	Approval by the Community VP and the Finance Director

JLL Restricted Funds

The Resource Fund, 30th Anniversary Fund, AJLI Marketing Award Fund & Community Impact Fund are board designated funds. Usage for the Resource Fund is defined above in the Resource Fund Policy. Usage for the 30th Anniversary Fund, AJLI Marketing Award Fund & Community Impact Fund is per board discretion.

Incremental funds can be added to the following funds: Holiday Hampers Fund, Scholarship Fund & Children's Literacy Fund. There is no time restriction on these funds; monies in the funds can be used in the current or a future league year.

If a monetary donation specifies a purpose which is not covered by an existing fund or if there is a time restriction associated to spending the monies, then a new fund should be created.

The Finance Director will assess if monies should be restricted and if so, which restricted fund should be leveraged based on the documentation provided. If a new fund is required, the Finance Director will create a restricted fund overview including the restricted fund objective and accounting along with the access and approval process.

B. Budget Norms

Unless the Board of Trustees determines otherwise in any given year, each annual budget presented to the membership for approval shall adhere to the following conditions:

- The budget presented to the membership shall be balanced (budgeted income equal to budgeted expenses).
- In developing the budget, the Board of Trustees shall:
 - optimise the ration of fundraising costs (both direct costs and volunteering time) to net income generated.
 - o seek efficiencies in operating costs.
 - and maximise spending on areas that directly relate to its mission to promote voluntary service, develop the potential of women, and improve the community.

C. Financial Reporting.

The Finance Director shall present financial reports to the Board of Trustees not less often than quarterly. Such reports shall include a forecast against budget for the remainder of the year. The Finance Director shall also present a mid-year financial report to the membership by no later than 30 January of each fiscal year and an end-of-year financial report to the membership no later than 31 July of each fiscal year. The end-of-year report should be prepared in consultation with the immediate past Finance Director, as appropriate.

D. Reviewing Financial Suppliers.

The Finance Director shall conduct an alternate review of the independent reviewers and bookkeepers every four years, to ensure that their rates and practices are favourable relative to other financial service providers. The review shall be conducted within the first six months of the JLL financial year. The Finance Director shall lead this review and form a task force, if necessary. The evaluation shall include the incumbent and at least two other suppliers. The next date for review of the bookkeeper is 2025-2026, with recommendations to be presented no later than the March Board meeting, and the next date for review of the Independent Reviewers is 2022-23, with recommendations to be presented no later than the December Board meeting. If the Finance Director recommends changing the auditors/independent reviewers and/or bookkeepers, the Board of Trustees must vote to approve such a change.

E. Cheque Signing and Online Banking Procedures.

Two signatories shall be required for cheques on JLL accounts; these can be either two primaries or one primary and one secondary. The only authorised primary signatories shall be the President, President-Elect, Finance Director, Director of Operations and JLL Bookkeeper. Signatories may not sign cheques for their own reimbursements. Only one paid staff member may sign a cheque. For the avoidance of doubt, the Director of Operations and the Bookkeeper are paid staff.

Every effort shall be made by the Director of Operations to have new mandates completed and in effect with the start of the new fiscal year, however in the event they are not completely finalised, the primary signatories from the previous fiscal year will remain eligible to sign cheques until the new mandates are in place. In the event this needs to happen, the primary signatories shall be informed of this and also shall be informed when they are no longer eligible to sign cheques.

Payments to transfer funds online shall be authorised by two primary signatories. The only authorised primary signatories shall be the President, President-Elect, Finance Director, Director of Operations and JLL Bookkeeper. Signatories may not authorise their own reimbursements. Only one paid staff member may authorise an online transfer. For the avoidance of doubt, the Director of Operations and JLL Bookkeeper are paid staff.

F. Expense Reimbursements.

Requests for reimbursements must be in writing using the online e-form found on our website and complying with the instructions set forth in the Expense Reimbursement Procedure found on the webpage under member's resources. Reimbursement requests should be submitted promptly after the expense has been incurred. Reimbursements for expenses incurred during any fiscal quarter will not be reimbursed if the reimbursement request is delivered to the JLL office after the deadline determined by the Finance Director and published in The JLL Journal. Such deadline shall not be more than 30 days after the close of the fiscal quarter.

Members are advised that expense reimbursements, or requests for cheques to be raised, may take approximately two weeks to process from the date of approval. Committees should plan accordingly.

Reimbursements in other currencies where required are made utilising the day rate on which that expense was submitted. The Director of Operations will review the exchange rate for pounds and the other currency using the following website - <u>https://www.xe.com/currencyconverter/</u> and process that payment accordingly.

As a charity, the JLL does not reimburse for committee meeting refreshments, taxis, couriers or copying done outside the JLL office unless approved in advance by the President, President-Elect, or Finance Director in exceptional circumstances.

JLL funds may not be used for internal tokens of appreciation by committee chairs, officers, or committees. Exceptions to this rule are line-item budgeted funds and any discretionary funds allocated in the budget to the JLL Officers.

G. Alcohol Policy.

As a charity, the JLL does not pay for or reimburse for alcohol, except in the following circumstances:

- Community Partner Receptions
- Fundraising events where alcohol is integral to the event.
- General Meetings where the cost of the alcohol will be paid back by membership purchase.

Any reimbursement for alcohol that falls outside these parameters must be approved, in advance, by the Board.

The JLL does not reimburse for alcohol at council, committee or Sustainer meetings, Board meetings, Neighbourhood Meetings, council, committee, or Sustainer celebrations (other than those listed above), or as part of travelling expenses.

H. Income/Cash Receipts.

All income/revenue received or collected by a member on behalf of the JLL should be paid over promptly, and in any case no later than ten days after receipt. The member should transfer funds to the JLL (or JLLE, as appropriate) bank account to cover any cash received and keep the cash. Income should be remitted together with the <u>Income Reporting Form</u> which can be found on the webpage under Resources/Useful Info/Finance and Operations Forms.

I. Contracts.

A written contract must be secured for all JLL and JLLE commitments for goods and/or services exceeding £500 (inclusive of all associated costs such as payment fees, travel expenses and VAT). All contracts shall be reviewed in advance by the relevant Council Head and then submitted to the President-Elect who is the only person authorised to sign contracts on behalf of JLL or JLLE. If the President-Elect is away from London for an extended period, the President may sign in her place. The bookkeepers are not permitted to raise cheques based on a contract signed by any other member. The Board of Trustees must approve contracts for unbudgeted expenses over £2,000 before the President-Elect may sign the contract. The original, signed copy of all contracts must be delivered to the office staff for the financial records of the JLL and placed on file in the JLL office.

J. Travel Reimbursement Policy.

It is the practice of the JLL to reimburse its members appointed to represent the JLL at conferences in the UK or abroad for expenses incurred that are directly attributable to JLL activities. The following guidelines should be adhered to:

- 1. All allowable expenses incurred while travelling on JLL business should be submitted for reimbursement within 45 days of completion of the trip. Where members have made payments by credit card, they will receive reimbursement for the actual exchange rate shown on their monthly credit card statement. Otherwise, they will receive the official exchange rate for the date the expense was incurred as determined by the bookkeepers.
- 2. All travel arrangements should be made, using the member's own credit card, as soon as possible after a trip is confirmed, and using the lowest fare available without undue stops and layovers. Air travel is to be arranged directly by each member and must be in economy class. The cost of transport to and from the airport will be reimbursed by the JLL provided cost-effective means (i.e., the Heathrow or Gatwick Express or U.S. shared van services, public transport, or airport / hotel courtesy buses) are used whenever practicable. Members who extend their trip for personal reasons, or who stop over at locations other than that for the conference, shall only be reimbursed for the average cost of a direct flight to and from the conference location during the relevant time period.
- 3. Members will be asked to share rooms with at least one and some cases two other members at AJLI Organizational Development Institute (ODI) conferences; single room

occupancy rates at ODI conferences will not be reimbursed. Members attending the AJLI Fall, Winter, and Annual Conferences may be reimbursed for single room occupancy rates. Members will only be reimbursed for hotel room costs during a conference or meeting, taking into account available flights. Payment for any additional room nights will be the responsibility of the member unless approved in advance by the Finance Director.

- 4. Meals not provided as part of the conference will be reimbursed at the rate of up to £60 per day (£10 for breakfast, £20 for lunch and £30 for dinner). Delegates will only be reimbursed for actual expenses up to these limits; the cost of alcohol will not be reimbursed.
- 5. Telephone calls or internet connection charges up to £10 per day will be reimbursed. Members are encouraged to use free internet-based connection i.e., Zoom, Skype, Google meet, Facetime, whenever possible.
- 6. A contribution towards additional dependent care (beyond what would normally be spent by the member if she were not travelling) will be made at a rate of up to £50 per 24-hour period with a maximum of £200 for the duration of any one conference/retreat. Appropriate documentation must be supplied.

K. JLL Credit Card and Debit Card Usage

Any Debit card or Credit card held by JLL or JLLE is to be used primarily for emergency expenditures requested by the Office Staff and/or Board of Trustees, as authorised by the President, President-Elect, or Finance Director.

To the extent that a committee chair/co-chair requests permission to the use the JLL Debit to limit large expenditures being required of committee members, for instance Holiday Hampers, the following steps should be taken to authorise charges to the credit/debit card. Individual charges requested by a committee member are to be approved by the committee chairs and Council VP via email to the Office with the President, President-Elect, Finance Director, and Bookkeeper in copy before the office staff puts through the payment as detailed in the request. Purchases requested by the Council VP, need to be approved by either the President, the President-Elect, or the Finance Director.

Invoices and member expense reimbursement are the primary means of covering committee expenses.

Use of the credit or debit card should not be the default means of payment and be limited to instances where a member's committee-related expenses are anticipated to exceed £500 in total for the League Year.

DEBIT CARDS: To ensure availability of the Debit cards when needed and that the Debit cards are being used by an authorised card holder, there will be up to three Debit cards issued for both the JLL and JLLE. The Debit cards may be issued in the name of the Office Staff, President – Elect and the President. These individuals will be the only individuals authorized to use the Debit cards in line with the agreed policy and procedures as stated above. The Debit cards will remain in place during the tenure of the respective roles, other than the President-Elect who will maintain ownership of the card when they transition into the President's role. Each individual will be responsible for cancelling the cards upon termination of their respective roles. The bookkeeper is to be promptly informed of any charges put through on the Debit card.

CREDIT CARDS: One Credit card may be issued for each the JLL and JLLE. The Credit cards will be issued in the name of the Office Staff, who will be the only individual authorized to use the Credit cards primarily for emergency requests made by the Office Staff and/or Board of Trustees. The Credit cards will remain in place during the tenure of the Office Staff and will be cancelled upon termination

of their role. The bookkeeper is to be promptly informed of any charges put through on the Credit card. Any credit card balance is to be paid in full upon receipt of the statement.

To the extent JLL has a debit card, the debit card is to be used in preference over a credit card, subject to sufficient JLL cash balances. As above, the bookkeeper is to be promptly informed of any charges put through on the credit or debit card.

The cardholder's use of the card will be periodically reviewed by the Finance Director to confirm its use is consistent with the above policy.

L. Dues Policies

1. **Dues Levels.** In April 2023, the membership voted to update the dues for 2023-24 and beyond at the following levels:

Actives and New Members	£160
Sustainers	£140

New Members will pay New Member Dues upon attendance at the first new member training session.

In February 2010, the JLL Board set Non-Resident Active and Non-Resident Sustainer dues at £100 per annum.

Dues amounts are based on timely receipt and is the responsibility of the member to ensure any payment issues are escalated to the Director of Operations, President, and Membership VP. Any dues received 1 week after the stated deadline the following late fees will be assessed the minimum of GBP 5 and maximum of 30% of the outstanding amount.

Incoming transfer members completing their transfer between 1 July and 31 December of each fiscal year pay 50% of the dues rate of their JLL Membership Type, less the amount of the AJLI Head Tax plus an administration fee of £30 and any required Fund Development Contributions; those completing their transfer between 1 January and 30 June each fiscal year pay only the £30 administration fee.

Outgoing transfer members completing their transfer between 1 July and 31 December of each Fiscal Year will receive a refund of 50% of dues rate less the amount of the AJLI Head Tax.

Those completing their transfer between 1 January and 30 June will receive no refund.

Members dropped for non-payment of dues or who have resigned in good standing may be reinstated after paying the current year's dues in full plus a £30 administration fee.

Administrative or Late Fees can be waived with approval by the Finance Director and President-Elect.

2. Dues Payment Process.

Active and New Members in good standing will receive their dues and placement package by early April of each year. Dues payments must be made, and placement forms completed, by the stated deadline for that year, usually by the end of April. Members returning their dues payment and paperwork after the deadline (a) will incur a late fee as stated above in section 1, and (b) will

not be placed on a committee until after all members paying on time have been placed.

Sustainers, Non-Resident Actives and Non-Resident Sustainers will receive their dues package by mid to late April and must complete their dues payment by the stated deadline for that year, which shall be no later than 31 May. Late payments will incur a late fee as stated above in section 1.

Members who have not paid their dues by 15 June of each year will be contacted by either the Membership VP or a member of the Placement Committee at the most current e-mail address or telephone number provided to the JLL by the member. The Membership VP or Placement Committee will explain that if the dues are not paid by 30 June the member will be dropped from membership. A list of all members receiving such communications shall be provided to the Board of Trustees. Members who have not paid their dues by 30 June will be dropped for non-payment of dues, except in cases where the Board of Trustees determines that extenuating circumstances exist. A dropped member may apply to the Membership VP to be reinstated; see above for reinstatement fees.

- 3. **Dues Changes.** The amount of dues is subject to review each year by the Board of Trustees and should be considered and decided no later than December annually. If any change to dues is proposed it must be approved by the membership, either at a General Meeting or by electronic ballot. This approval shall occur prior to the Board submitting a new budget based on the proposed dues increase.
- 4. **Dues Refunds.** JLL members who transfer to another Junior League may be entitled to a refund of a portion of their dues depending on the date of the transfer. See AJLI policy entitled "League Dues Procedures for Transferring Members" available from the League office. No other refunds of dues or New Member dues are available.
- 5. Dues Scholarship Fund. The Board has established a Dues Scholarship Fund to advance the leadership skills of women in the community by providing financial assistance to members seeking to strengthen their professional skills and personal development. Priority will be given to members with the greatest financial need who also demonstrate the values of the JLL. The application and awards process will follow the Scholarship Fund policy outlined in the Appendices.

M. Fund Development

- Fund Development Responsibilities. All solicitations for funds or in-kind donations to support the JLL must be coordinated through the appropriate Fund Development Committee. Members in other Councils, including New Members, who have fundraising ideas or leads on corporate donations or sponsorships must liaise directly with the Fund Development VP or chair of the relevant Fund Development committee before acting on the JLL's behalf. Committees actively involved in procuring in-kind donations must coordinate with the Fund Development VP or chair of the relevant Fund Development committee to ensure mutual awareness of JLL corporate solicitations and donations.
- 2. **Fund Development Communications and Contracts**. Members are reminded that all external communications must be approved in advance by the President-Elect and the Communications Vice President and that contracts may only be signed by the President-Elect. Committee chairs must check with the relevant JLL Council lead before promising any type of "quid pro quo" agreement with funders or donators (e.g., an advertisement in a JLL

publication).

- 3. **JLL Is Not a Fundraising Agent**. The JLL does not act as a fundraising agent for other organisations. Thus, for example, member time spent on a volunteer shift may not be for the sole purpose of collecting money or raising funds for another organisation.
- 4. Approval of Fundraisers. All new fundraisers designed to raise £15,000 or more must first be agreed by the Fund Development Council and Board of Trustees before being presented to and approved by the membership. Smaller fundraisers must be approved by the Fund Development Council and if the Fund Development Council deems it necessary, by the Board of Trustees.
- 5. **Gift Aid and Corporate Matching Programmes**. All members engaged in fundraising are reminded of the importance of placing "Gift Aid" notifications, and/or corporate matching reminders, on their fundraising materials if applicable. Further information may be obtained from the Fund Development VP or Finance Director.
- 6. **Prize Draw Procedure**. The JLL does not hold Raffles and instead uses Prize Draws as a fundraising tool. These Prize Draws must be held as part of a wider JLL event rather than standalone. Refer to the Prize Draws Procedure for detailed information.
- 7. **Tainted Donations.** The JLL has adopted a Tainted Donations Policy in the form attached as Appendix M to these Operating Policies and Procedures. If any member or employee is concerned that any donation made to the Junior League of London could be a tainted donation, they must immediately raise the issue immediately to leadership.

N. Investment Policies

It is the policy of the JLL to invest all funds not immediately needed to pay its obligations in interestbearing accounts. All investments are to be made in institutions or accounts insured against loss of capital. Investments in money market accounts, certificates of deposit, or other similar instruments permitted by UK law will be made when it is apparent that there is not an immediate need for the funds, market conditions are not volatile and risk factors have been reviewed. Maturity dates will be arranged so they will fall due when the funds are needed to meet the financial obligations of the JLL. The allocation of deposits and investments, as applicable, across financial institutions should be considered with respect to the maximum amount of compensation protection provided by the Financial Services Compensation Scheme.

It is the Finance Director's responsibility to oversee the investments of the League, with the approval of the Board of Trustees. To minimise risk, emphasis will be given to preserving capital rather than to maximising gains. However, investing the money in some manner is prudent. For the most part, investments will be in cash equivalents. Any provision in this policy that is contrary to the laws of the United Kingdom is null and void and not binding upon the Finance Director.

O. Independent Review Process

 Independent Review Committee. The Committee will be composed of a minimum of three members of the serving Board of Trustees in the year following the fiscal year being audited or reviewed. The Committee will include the President-Elect. Additionally, Non-Executive Director(s), President, and/or other JLL members are eligible to serve on the Committee (if they were not the President, President-Elect, or Finance Director during the year for which the accounts are under review). The Committee will participate in meetings with the Independent Reviewers, and in their review consider if: (1) the accounts are fit for purpose; (2) anything appears to be fraudulent; (3) anything has changed in the control environment which needs to be reflected in the financial accounts. In the board meeting at which the reviewed financials are presented for approval, the Independent Review Committee will present a memo outlining their view on whether the financials should be approved.

2. Timeline and Board Obligations. The reviewed financials are to be filed with Companies House by 31 December. The Board of Trustees must approve the financials before filing with Companies House. At the meeting convened to approve the financials, the Finance Director will submit a memo assessing financial controls as well as the nature of the JLL and JLLE as going concerns.

P. Risk Register

The Risk Management Plan and Risk Register were developed as tools to help track, monitor, and mitigate risks to the League. As per above, the Finance Director shall complete the annual maintenance of this plan. To ensure the Risk Management Plan and corresponding Risk Register remain relevant and reflect ongoing League practices, at the direction of the President, every five years the League shall undertake a full, comprehensive review.

Q. Crisis Management

All crises and high-risk issues shall be reported to the President and President-Elect of the League immediately. In line with Charity Commission and best practice guidance, the members of the Board of Directors will make the decision to take action, including the League's communications response, during an internal crisis or one affecting the community at large. The Board shall appoint a Crisis Management and Communications Team, which will have the responsibility of directing and coordinating all aspects of the League's response, including managing the messages and the media. The Crisis Management and Communications Team will be led by the President and will include the President-Elect and Communications Vice President as well as other members as deemed appropriate by the President depending on the nature of the crisis and the response. The Communications Vice President and Communications Plan including key stakeholder mapping. The Crisis Management and Communications Team will be possible, the League shall provide media training for the incoming President to carry out her role in a crisis, either through AJLI Annual Conference or other means.

R. Anti-Fraud Policy

The JLL has adopted an Anti-Fraud Policy in the form attached as Appendix H to these Operating Policies and Procedures. It sets out the policy and procedures of the Junior League of London against fraud and other forms of dishonesty. It applies to Directors, staff, and members.

VIII. MEMBERSHIP

A. General Commitments of Membership

- 1. A member shall be considered in good standing if she meets the commitments of her membership status as approved by the JLL membership and attached to these Operating Policies and Procedures as Appendix A; and (c) she complies with the JLL's Code of Conduct.
- 2. As a company limited by guarantee, each member undertakes to contribute a maximum of £10.00 to JLL's assets if it should be wound up while she is a member, or within one year after she ceases to be a member, for the payment of JLL's debts and liabilities. This agreement is confirmed annually through the payment Annual Dues.

B. Categories and Qualifications of Membership

1. **New Members.** New Members are those members who are engaged in a training programme developed by the Membership Council that explains the Mission of the JLL, provides information about the needs of the London community and the JLL's community focus, and prepares them for active membership in the Junior League. In order to qualify as a New Member, the candidate shall be at least 18 years of age and have an interest in, and a commitment to, voluntary service. Upon joining a New Member Class, New Member dues shall become due and payable. New Member dues cannot be deferred or refunded should the prospective New Member be unable to complete the class she has joined.

New Members in good standing are eligible to vote and take a committee placement but may not hold office.

New Members shall become Active upon satisfactory completion of the New Member Class, the recommendation of the New Member Development Committee, and the approval of the Board of Directors. New Members who are unable to meet the requirements of their course may be granted an extension by the Membership Council in order to complete such requirements. No such extension shall extend past the completion date of the next succeeding New Members Training Course.

2. Active. Active members are those members who have successfully completed a course of New Member training in this League or another League and justify Active membership by demonstrating voluntary service to this community and this League. Active members are responsible for annually meeting all commitments for Active membership as set forth in Appendix A. Active members shall sign a statement of commitment each year as drafted by the Placement & Transfers Committee. Once Active, members may retain this membership status indefinitely so long as they remain in good standing.

Active members are eligible to vote and hold office.

3. **Sustaining.** Sustaining members are those members who have served as members of the Junior League of London in good standing for a period no less than seven full league years or who have earned 72 points. Sustaining members continue to support this League and the community by the paying of annual dues.

Sustaining members from another League who transfer to the Junior League of London will be recognised as Sustaining members in London.

For an Active member who has transferred from another League will be eligible to become a Sustaining member after completing seven full league years of service in good standing in all Leagues or accumulating a total of 72 points.

Sustaining members are eligible to vote and hold office.

4. **Sustaining Emeritus.** Sustaining Emeritus members are those members who have reached the age of 80 years and have requested Emeritus status. Upon being granted Emeritus status permanently, the member shall no longer be required to pay dues to any Junior League. The member's Emeritus status shall be reflected on the JLL's membership roll, but the JLL shall have no financial obligation to AJLI for such member. Sustaining Emeritus members receive the JLL newsletter.

Sustaining Emeritus members may not vote or hold office.

5.

Honorary. Honorary membership is a reward given to non-members by a unanimous vote of the Board of Trustees. Honorary members shall be invited to all meetings and functions of the JLL, receive the JLL newsletter and have no financial obligation to the JLL. An Honorary member must be a resident of the United Kingdom.

Honorary members may not vote or hold office.

C. Privileges of Membership

1. Inter-League Privilege. Any Active or Sustaining member of another Junior League who will be residing within the JLL's service area during a JLL fiscal year shall, if requested, be granted the Inter-League privilege. The Inter-League member shall be listed as a member and shall pay dues to the sending League, which shall have final responsibility for the member in all AJLI matters. Members of other Junior Leagues requesting this privilege with the JLL shall pay an administrative fee to the JLL as determined by the Finance Director. Members of other Junior Leagues intending to reside in the JLL service area for a period of more than two JLL fiscal years shall be encouraged to join the JLL rather than continuing to request the Inter-League privilege; however, extenuating circumstances shall be considered by the Membership Council.

JLL Inter-League members shall be entitled to all privileges of membership for their membership status, except that they are not entitled to vote or hold office.

2. **Seasonal Inter-League Privilege.** Any Sustaining member of the JLL who resides for a portion of the year near another Junior League, and who formally requests in writing to the JLL Membership VP, shall be granted the seasonal Inter-League privilege to enable her to participate in the activities of both Leagues.

JLL Seasonal Inter-League members shall be entitled to all privileges of membership for Sustaining members.

3. **Non-Resident Privilege.** Active and Sustaining members in good standing who live at least thirty miles from Hyde Park Corner in London, and who so formally request in writing to the Membership VP, shall be granted the Non-Resident privilege. Non-Resident members shall pay JLL dues and shall receive the newsletter. Non-Resident members can vote but cannot

hold office and have no membership commitments other than the payment of dues. Members may retain this status of membership indefinitely.

4. **Transfer Privilege.** Any member in good standing may request to transfer her membership to another Junior League at any time. A member who requests to transfer her membership shall be granted a category of membership status consistent with the specifications of the membership categories of the receiving League. A New Member who transfers has the right to complete the New Members' training course as determined by the receiving League.

All requests to transfer membership must be made in writing or by electronic means to the JLL office and the Membership VP and are coordinated by the office staff who collectively act as Corresponding Secretary of the JLL. No member will be transferred until a Transfer Form been completed in full and received in the JLL office. In particular, members should note that transfers cannot be processed until the member desiring to transfer has provided the JLL office with a complete postal address, telephone number and e-mail address in the location to which she is moving. A member may not commence a transfer out of the JLL more than one month prior to the date she ceases to reside in the UK. Transferring members may be eligible to receive a refund of dues; see Finance policies and procedures.

Any incoming transfer member to the Junior League of London shall pay dues as set forth in the Finance policies and procedures. Any incoming Active transfer member shall have the option either to be immediately placed on the committee of her choice from among those committees needing new committee members at the time of the transfer, or to be granted a three month" grace period" which shall not be considered a leave of absence pursuant to paragraph 5 below. A transfer is not considered complete until all relevant paperwork has been received from the transferring member. All transfers pay a £30 administration fee on transferring to the Junior League of London.

5. **Member Reference.** Any member in good standing may request a letter from the Membership Vice President verifying her membership in the JLL. Such a letter shall be presented in hardcopy on JLL letterhead with content limited to the following:

[Date]

To Whom It May Concern,

The Junior League of London is a UK registered charity of women working together to improve our local community through our volunteer efforts. Among other commitments, active membership in the Junior League of London requires that each member volunteer her time to support the League's charitable activities in the London community.

I can confirm that, as of the date of this letter, [Member] is an active [or other status as relevant] member of the Junior League of London.

Regards,

[Name] Membership Vice President, [Year]

D. Resignations, Reinstatements and Removals

- Resignation. Any member of the Junior League who is in good standing may resign in good standing at any time by written (including email) request to the Membership VP. Pursuant to AJLI rules, members who resign in good standing and later request to be transferred to another Junior League must first be reinstated as a member of the JLL. The Placement & Transfers Committee shall conduct an "exit interview" with each resigning member.
- 2. Reinstatement. Any Active or Sustaining member who has resigned in good standing may reinstate her membership by application to the Corresponding Secretary. Any member dropped for non-payment of dues who wishes to be reinstated may do so by application to the Membership VP and the Finance Director. Members wishing to reinstate shall pay reinstatement fees as set forth in the Finance policies and procedures. Any member requesting to be reinstated will be reinstated to the membership status she held at the time of resignation unless she meets the requirements of another membership status at the time of reinstatement and requests to be reinstated to that status.
- 3. **Removal.** A member may be removed from membership for non-payment of dues, noncompliance with the JLL's Code of Conduct, non-performance of committee commitments or failure to meet other membership commitments as described in Appendix A.

A member who is removed for non-payment of dues will be notified as provided in the Finance policies and procedures noted above; no opportunity for a hearing before the Board of Trustees shall be given.

A member who fails to comply with the JLL's Code of Conduct, fails to complete her committee commitments or other membership commitments may be removed by vote of the Board of Trustees after a period of fourteen days' notice in writing to the member from the Placement & Transfers Committee, sent by special delivery, stating the cause for such action. The notice shall state that the member may attend the meeting of the Board at which the member's removal shall be considered. See Article 4(4) of the Articles of Association.

E. Board of Trustees

- 1. **Qualifications.** Any Active or Sustaining member in good standing may serve on the Board of Trustees.
- 2. **Election Process.** Members of the Board of Trustees shall be elected by electronic ballot from a slate prepared by the Nominating Committee (and from additional candidates proposed in accordance with the requirements set forth in the following paragraph). The term of office shall be for one year, from Annual General Meeting to Annual General Meeting. See "Operations Council Voting by Electronic Ballot" for the procedures for voting on the slate.

The slate of candidates shall be presented to the Board of Trustees as a courtesy no more than 24 hours prior to the April Board meeting. The Board shall not substitute its opinion for that of the Nominating Committee as to which JLL member should serve in which capacity. The Board shall keep the slate confidential until it is presented to the Membership in order to protect the privacy and dignity of members.

The slate shall be sent to all voting members of the JLL the day after the April Board meeting. The deadline for submission of completed ballots (the "original election date") shall be at least 10 clear days from the date the ballots are sent to the membership.

Additional candidate nominations may be made with the consent of the nominee in a written letter signed by at least ten members and delivered to the Nominating Director (with a copy to the President and the President-Elect) prior to the original election date. If there are no additional candidates duly proposed, the slated candidates shall be deemed to have been elected on the original election date.

If there are additional candidates duly proposed, their names shall be made available to the voting members as the Nominating Committee deems appropriate (by post, notice in Communications, a posting on the JLL website, etc.) and a new election date (the "new election date") set for at least 10 clear days from the date on which the Nominating Committee makes the names of such additional proposed candidates available.

Any member who has already submitted her ballot, but wishes to vote for one of the additional candidates, may (i) contact the JLL office to revoke her initial ballot and request that a new ballot be sent to her, or (ii) in the case of an electronic vote, may submit a new ballot prior to the new election date and only the most recently submitted electronic ballot cast by any member shall be counted.

3. **Proceedings, Quorum, Vacancies and Removals from Office.** See Articles 19 through 41 of the Articles of Association.

Any meeting attendee may bring her infant, up to the age of six months, to meetings. However, if the infant becomes a distraction, the member must remove the infant from the meeting room. Children must be supervised at all times.

Pursuant to Article 34 of the Articles of Association, matters brought before the Board of Trustees shall be decided by majority vote of those members of the Board of Trustees present at the meeting at which the vote is taken. Proxy votes are not permitted.

Vacancies on the Board of Trustees shall be filled by majority vote of the Board following recommendations made by the Nominating Committee. Candidates shall meet the eligibility requirements for the position being filled as specified herein in Section VIII, G, 3 – "Nominating and Placement & Transfers Committee – Slated Positions"

Concerns relating to a member of the Board of Trustees will be managed in accordance with the Trustee Grievance Policy found in Appendix G.

4. **Meetings.** The Board of Trustees shall meet on a regular basis and at least six times per fiscal year. The Executive Committee shall meet on a regular basis and at least ten times per fiscal year.

G. Placement & Transfers and Nominating Committees

 Composition and Qualifications. The Nominating Committee shall consist of four Active or Sustaining members, plus the Nominating Director, all as elected by the membership. Members may serve an unlimited number of terms on the Nominating Committee but may only serve one term before rotating off for a term.

The Placement & Transfers Committees shall consist of no more than ten Placement Advisors, plus the Placement Chair, so long as the total Active membership of the JLL is 250 members or less. Should the total numbers of Active members exceed 250 members, the Placement & Transfers Committee shall then be composed of no more than twelve Placement Advisors plus the Placement Chair. In choosing the Placement Committee preference shall be given to any Active or Sustaining member who will have been active in any Junior League for a period of not less than two full calendar years at the time she would take office. In choosing the Placement Chair, preference shall be given to any Active or Sustaining member with at least three full calendar years of Junior League service, and either (a) prior Placement Committee experience or (b) prior JLL Leadership Team experience.

Members of both the Nominating Committee and the Placement & Transfers Committee cannot double place during their term.

2. **Election**. Nominating is a two-year term, with overlapping terms. In one year, three positions will be elected for a two-year term and in the following year two positions will be elected for a two-year term.

If a new member of the Nominating Committee is needed during the course of the JLL year, the Nominating Committee shall follow the procedures outlined in Section 3 relating to midyear vacancies to fill the position.

3. **Slated Positions.** The Nominating Committee shall be responsible for preparing a single slate of candidates for the next JLL year for the following positions: all members of the Board of Trustees; the Nominating Director and Committee; the Placement & Transfers Committee Director and at least five members of the Placement Committee and the Sustainer Director.

Unless the Board of Trustees approves an exception in advance, members of the Nominating Committee cannot be slated for any position on a slate that they prepare. The standing exception to this policy is that up to two members of the current Nominating Committee in any year may be slated to serve on the Nominating Committee for an additional year as provided above.

In the case of a vacancy for a slated position during the course of the League year, the membership will be notified of such opening (by posting on the JLL website or such other means as the Nominating Committee deems appropriate) and given an opportunity to apply for the open position. Vacancies for slated positions shall be filled by majority vote of the Board of Trustees following recommendations made by the Nominating Committee, except in the case of a vacancy for the President-Elect position, in which case a membership vote to approve the candidate recommended by the Nominating Committee. The procedures to be followed by the Nominating Committee in coming to its recommendations are outlined in the Nominating Handbook. Candidates shall meet the eligibility requirements for the position being filled as specified herein.

The procedures to be followed by the Nominating Committee in preparing the slate or to fill open Board positions are outlined in the Nominating Handbook. Substantive changes to the Nominating Handbook should be approved by the Board.

Members accepting Board of Trustees positions are required to sign a document, found in Appendix D, confirming they have been provided with JLL's Memorandum and Articles of Association, JLL's latest accounts and information on becoming a Trustee.

4. **Non-Slated Leadership Team Positions.** The Placement & Transfers Committee will be responsible for filling all remaining leadership positions, as outlined in the Placement Handbook. The Placement & Transfers Committee is responsible for the vetting (including if a member is in good standing) and appointment of all non-slated candidates and will notify each Council VP of any non-slated leaders they have appointed to her Council.

5. Nomination to AJLI Conferences. Delegates from the JLL shall be sent to the AJLI's Annual Conference each year. The JLL's voting delegate shall be the incoming President, unless she is unable to attend, in which case she will designate an alternate. If budget allows other delegates for the Annual Conference shall be proposed by the incoming President and approved by the Board of Trustees. If budget allows, the President and President-Elect shall attend Fall Conference and the President-Elect and the President-Elect-Elect shall attend Winter Conference.

Delegates shall be sent to other AJLI conferences at the discretion of the President and President Elect, from a list of proposed delegates prepared by the Council heads and recommendations, if any, from the Placement & Transfers and Nominating Committees. All attendees shall submit a written or verbal report to the Board of Trustees or Executive Committee about key learnings from the conference within 30 days of their return.

6. Eligibility and Commitment. The Placement & Transfers and Nominating Committees shall (a) ensure that all candidates for any leadership position meet the eligibility requirements for that position as provided in these Operating Policies and Procedures, and (b) require all candidates to have a full understanding of the obligations of the position for which the candidate is being proposed.

A past president may serve in any position regardless of eligibility, with the exception of Nominating as outlined in Section VIII, G, 1 – "Nominating and Placement & Transfers Committee – Composition & Qualifications", provided she is a member in good standing.

H. Confidentiality.

The Nominating Committee shall work within a context of confidentiality that protects the privacy and dignity of all members. The Nominating Committee must not share specific information about candidates under consideration (such as who is being considered, how many applications were received for a position, etc.) with anyone outside the Nominating Committee. There is only one exception to this: the slate must be presented to the Board as a courtesy no more than 24 hours prior to its presentation to the membership for voting.

IX. AMENDMENTS TO THESE OPERATING POLICIES AND PROCEDURES

Except as set forth below, the Board of Trustees may vote to amend these Operating Policies and Procedures. In addition, each Council, acting by majority vote of the Council leadership (see Section III, D – "Councils"), may recommend amendments to the Board of Trustees. The Board of Trustees shall vote on the Council's proposed amendments. The membership shall be informed of amendments approved by the Board of Trustees.

Any amendment to an operating policy or procedure that relates to:

- a. the Mission of the JLL
- b. the criteria for the categories, qualifications, and privileges of membership
- c. the annual membership commitments for Active members
- d. changes to members' financial obligations to the JLL
- e. changes to the nominating process and/or the list of positions to be slated by the Nominating Committee

- f. changes to the composition of the Board of Trustees (other than the floating positions to be determined by the Board of Trustees)
- g. the budget norms, reserves policy and members' approval of the annual budget for the JLL
- h. this list of amendments requiring membership approval

shall require the approval of the members eligible to vote thereon by a vote taken at any General Meeting, the Annual General Meeting or by electronic ballot. This approval will be sought after the Board of Trustees have approved the changes, as well as Council leadership as appropriate. See Section IV, Subsections F to H of these Operating Policies and Procedures, as well as Article 3 of the Articles of Association.

X. APPENDICES

Appendix A.	Active Member Commitments
Appendix B.	Points Allocation Chart - Transfers
Appendix C.	Child Protection Policy
Appendix D.	Board of Trustees Acceptance Form
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Appendix K.	Data Protection Policies:
	K1. Data Breach Policy
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APPENDIX A



Active Member Commitments

An Active member must pay Active dues. Active members are encouraged to accumulate a minimum of <u>**12** points per year</u></u>, between 1 June and 31 May of the relevant League year, but it is up to each individual member to determine the level of engagement that is appropriate for her.

The points are designed to recognise the amount of time required and/or impact to the League, based on the following guidelines approved by the Membership in April 2023:

- **1 point** for participating in a JLL volunteer activity such as: attending a GM, participating in a Community volunteer shift, or working a volunteer shift at a fundraiser.
- **1 point** for every £100 of cash donated to the JLL or £200 of in-kind donations secured.
- **2 points** (per quarter) for helping to organise a JLL activity by serving on a project team or committee or attending Conference.
- **3 points** (per quarter) for serving as a leader of a committee or project team, or as a member of a signature project committee (such as Holiday Hampers)
- **4 points** (per quarter) for our most intensive leadership positions, including members of the Board of Trustees or signature project Chairs (typically an annual commitment)
- Extra points at Board discretion to motivate and reward our members.

The Board has delegated decisions regarding the awarding of extra points and allocation of points within these guidelines to the Executive Committee.

The Placement Committee will work with the Executive Committee to keep the allocation of points under review to ensure that they continue to motivate and reward our members in line with the strategic objectives of the JLL. Points approved by the Executive Committee will be included on the Member Page of the JLL website, or otherwise communicated as deemed appropriate by the Executive Committee.

For the avoidance of doubt, any changes to the member commitments or points guidelines noted above will be presented to the Board, and if approved, to the Membership for vote.




Points Allocation Chart - Transfers

Cumulative points for Active members who transfer into the Junior League of London from another AJLI League will be calculated as follows:

Current Membership Level	Years of Active Service as of the date of transfer**	Cumulative Points upon Transfer to the JLL
Active	0.5 years	8 points
Active	1 year	17 points
Active	1.5 years	25 points
Active	2 years	34 points
Active	2.5 years	42 points
Active	3 years	51 points
Active	3.5 years	56 points
Active	4 years	62 points
Active	4.5 years	67 points*
Active	5+ years	72 points*

**excluding any Leaves of Absence or Non-Resident years

As noted in the Membership section of the OPPs, Sustaining members from another League who transfer to the Junior League of London will be recognized as Sustainer members in London.

APPENDIX C



Child Protection Policy

All Junior League of London programmes in which children participate are developed and run in partnership with recognised charitable and government agencies. These community partners bear primary responsibility for the welfare of the participating children.

It is our responsibility to provide trained and vetted volunteers fully committed to safeguarding children's rights and protection from abuse. The welfare of children in our community programmes is paramount, and we take seriously the duty of care such programmes entail for both our organisation and our community partners. This duty extends to every JLL member participating in our community programmes, who must be aware of their responsibility to report any concerns.

All suspicions and allegations of abuse will be taken seriously and will be responded to in a swift and appropriate manner.

Good Practice

We will design and administer our programmes in such a way to minimise the risk of situations where children might be abused or come to harm. The following guidelines apply:

- Our community partners are registered charities, schools, and governmentagencies with professional training in administering children'sprogrammes.
- For children in ongoing programmes, (programmes with repeated interactions over a number of weeks or months with the same community partner, e.g., tutoring at Colville Primary School. It does not include one-off volunteer interactions), our community partner will maintain a list of emergency numbers for each child.
- For offsite activities, we will work with our community partners to establish procedures for the safe transfer of children between responsible adults.
- All suspicions and allegations of abuse will be referred through appropriate channels. Unless otherwise agreed upon with our community partner, matters will be referred to the JLL committee chair or activity leader, who will inform our community partner with primary responsibility for the children.
- Recognising that respect for children is of utmost importance, all suspicions and allegations of abuse will be taken seriously. JLL volunteers will refer these matters appropriately (as described above) and maintain the confidentiality of any information of this nature that comes to their attention.
- There will be at least two adults present at all times with children participating in our community programmes, except in specific instances in ongoing programmes as requested by or discussed with our community partners.

Our Volunteers

All Junior League members are provided with a placement handbook, which defines their roles and responsibilities. They know what is expected of them both in the community and within the League organisation. They undergo community-specific training and monitoring as follows:

• The League holds current details for our JLL members at our office, including name, address, and birth date in compliance with GDPR regulations.

APPENDIX C



- All our members undergo general community training, as well as additional training as needed for child-related activities.
- A criminal records check is performed for all JLL members placed on ongoing programmes working with children. Details regarding these checks, including members' Disclosure Reference numbers, are kept on file in the JLL office.
- Members who come into contact with children through our volunteer activities for short periods are supervised by the activity leader and/or our community partner. This includes volunteers participating in our short-term volunteer shifts.
- All community programmes are continually reviewed by JLL committee chairs and overseen by our Community VP and Executive Committee.
- All hands on volunteers have access to resources and printed materials on child protection issues, including information from the <u>Department of Health</u>, Volunteering England and the <u>NSPCC</u>.

APPENDIX D



Junior League of London Trustee Acceptance Form

Please complete and sign:

SURNAME:
ANY PREVIOUS SURNAMES:
FIRST NAME/S:
ANY PREVIOUS FIRST NAMES:
PREFERRED ENTIRE NAME:
TITLE: e.g., Ms, etc HONOURS, ETC DATE OF BIRTH:
HOME ADDRESS:
POSTCODE
NATIONALITY: OCCUPATION:

I confirm that I have been provided with the following information:

- ✓ A copy of the Junior League of London governing documents
- ✓ A copy of the Junior League of London latest annual reports & accounts
- ✓ Charity Commission CC3 Publication The Essential Trustee
- ✓ Information regarding Trustee Conflict of Interests

I have been provided with and completed the following forms, in addition to this form:

- ✓ Declaration of Eligibility for newly appointed Trustees
- ✓ Declaration of Interests form

I accept the role of a charity trustee and company director of Junior League of London, UK registered charity no. 1103298, registered as a company limited by guarantee in England No. 5045667 and consent to my details being entered on Companies House via the online Appointment of Director AP01 form.

Signed:....

Date:....

Please extend any information overleaf which will not fit onto this page, clearly noting which sections you are expanding overleaf.





Expense Reimbursement Policy and Procedure

All requests for reimbursements and payment of invoices must be made in writing by submitting an electronic expense form found here, and complying with the instructions set forth below:

Proof of Purchase

- 1. You MUST have an **ORIGINAL receipt/invoice**, or you cannot claim the expense i.e., credit card statements are not acceptable.
- You MUST upload your proof of purchase/ invoice to the e-form before you submit your request. This image must be clear and legible. ANY CLAIMS SUBMITTED WITHOUT RECEIPTS MAY NOT BE REFUNDED.
- 3. For expenses under £100, a till (cash register) receipt is fine, although you can also submit an invoice for any amount.
- 4. All invoices must show the JUNIOR LEAGUE OF LONDON as the PURCHASER (your name in addition as a contact is acceptable).
- 5. As a charity, the JLL does not reimburse for taxis, committee meeting refreshments, or photocopying, except in special circumstances which have been pre-authorised with the Finance Director.

Sage Codes

6. You **MUST include the relevant sage code** for us process your expense. Information regarding expense codes can be found here: <u>Sage Codes here</u>

<u>Approval</u>

- 7. You **MUST include the name of the person who will APPROVE this request** i.e., your committee chair or Council VP. (If you are a committee chair you cannot approve your own expense, you will need to put the name of the committee co-chair OR Council VP.)
- 8. Expenses MUST be claimed within the time frame for the relevant JLL year, as set annually by the Finance Director.
- 9. After you have submitted this portion of the e-form, we will forward it to your Committee Chair for confirmation of approval, or if you are the Committee Chair to your Council Head, who will need to approve the expense before processing.
- Reimbursement requests should be submitted promptly after the expense has been incurred. Reimbursements for expenses incurred during any fiscal quarter will not be reimbursed if the reimbursement request is submitted after the deadline published in The JLL Journal. Such deadline shall not be more than 30 days after the close of the fiscal quarter.
- Members are advised that expense reimbursements, or payment of invoices, usually take approximately two weeks to process from receipt of expense claim form AND approval. Committees should plan accordingly.
- As a charity, the JLL does not reimburse for committee meeting refreshments, taxis, couriers or copying done outside the JLL office unless approved in advance by the President, President-Elect, or Finance Director in exceptional circumstances.
- JLL funds may not be used for internal tokens of appreciation by committee chairs, officers, or committees. Exceptions to this rule are line-item budgeted funds and any discretionary funds allocated in the budget to the JLL Officers

APPENDIX F



Dues Scholarship Overview

Scholarship Objective:

To advance the leadership skills of women in the community by providing financial assistance to members seeking to strengthen their professional skills and personal development. Priority will be given to members with greatest financial need who also demonstrate the values of the JLL.

Scholarship Accounting:

The Scholarship will be set up as a Restricted Reserve Account on the JLL Ledger. This is to ensure any gifts to the scholarship remain restricted. The scholarship will be separate from the annual budget process.

In the event that the scholarship is not awarded for 5 consecutive years, or the Board of Trustees chooses to end the Scholarship, funds will be re-directed to general reserves.

Scholarship Committee:

The Scholarship Committee is a standing Committee of the Board of Trustees. Chaired by the President Elect, the committee is responsible for the following:

- Ensuring and facilitating a Scholarship Application Process at the following times: (1) Annual Dues Renewal and (2) New Member Intakes
- Reviewing all Scholarship Applications and rewarding Scholarships to Members
- Ensuring Fundraising for the Scholarship occurs annually.

The Scholarship Committee will have 3-5 additional with at least 1 additional Board of Trustees Member and 1 Member from Membership Council. The recommended composition is Finance Director, Membership Vice President, Placement Representative, Nominating Representative and Non-Exec Director¹. All committee members will be required to adhere to an oath of confidentiality.

The members of the committee are ineligible to apply for the scholarship.

The committee will meet on an ad-hoc basis and provide the Board of Trustees annual updates on the following:

- Number of Applications Received
- Number of Scholarships Rewarded with membership type breakdown.
- Total value of Scholarships Rewarded
- Average scholarship rewarded.
- Number and amount of new donations received





Scholarship Guidelines:

- Full and Partial Scholarship funding is available for the cost of Membership Dues
- The scholarship is available to all levels of resident membership (New, Active, and Sustainer) and is non-transferable.
- The Scholarship is only intended to cover Membership Dues at the JLL. Any required Fund Development Contributions based on membership level are still required and will not be covered by the Scholarship.
- Members must submit the application via the form on Digital Cheetah to be eligible for the scholarship.
- Application due Date
 - Prospective Members: Applications dates are set in accordance with New Member Recruitment
 - Returning Members: Applications are due by 1 May unless extension is approved by Board of Trustees
- Scholarship recipients will be notified of the outcome of their application by the Annual General Meeting. If an applicant does not receive the scholarship, they are expected to pay full dues.
- The number of scholarships and recipients will be at the discretion of the Scholarship Committee
- Credit to Scholarship Recipient Member's Account will be done by the Director of Operations and Finance Director
- All information received in the application is considered confidential to the applicant, Scholarship Committee and Director of Operations. The Names of Scholarship recipients are available to the Board as needed upon request to the Scholarship Committee Chair (President-Elect).

APPENDIX G



Grievance Policy

Definition of Grievance for JLL

A Grievance falls in one of the following categories 1) Code of Conduct Violation, 2) OPPS Violation or 3) Other Legal Violation

Grievances are only applicable if the issue is a member of the JLL Board of Trustees. All other issues within the league will be handled by the Placement Committee.

Grievances can be named or anonymous.

Establishment of Grievance Committee

The Grievance process is run by a committee of 3-5 of Past Presidents ("Grievance Committee"). The Grievance Committee will be listed in the Members section of Digital Cheetah. The Grievance Committee is responsible for determining which member will lead an incident investigation.

The President is responsible on ensuring the Grievance Committee is fully staffed.

Grievance Procedure:

- JLL Member or Staff raises a potent Grievance via an email to the Director of Operations.
- The Director of Operations forwards the information to the Grievance Committee.
- The Grievance Committee designates a lead investigator ("Investigator") for the issue.
- The Investigator reviews the Grievance to assess the severity. If the severity is High and provides a significant threat to the League, The Investigator asks a non-conflicted Board Member to call an urgent Board meeting to notify other Trustees of a significant reputational / legal risk.
- If the Grievance Severity is not high, the Investigator kicks off an investigation in the Grievance.
- As soon as reasonable, The Investigator reaches out to the party that filed the Grievance. The purpose of the discussion is to get any additional details that may be required.
- Next, the Investigator reaches out to set up a meeting with the Party that is named in the Grievance. The named party is allowed to bring another person to the meeting for support. If that person is an attorney, then it is important that the Investigator also has the JLL attorney with them. The Investigator will take notes of the meeting.
- The Investigator then prepares a report for the Board of Trustees with a recommended action.
- The report is discussed at the next Board meeting with a decision made by the Board. If the next Board meeting is not for the next 2 weeks, then an ad-hoc meeting is called.
- The Board decision is communicated to both parties.

APPENDIX H



Anti-Fraud Policy

1. Introduction

This document sets out the policy and procedures of the Junior League of London against fraud and other forms of dishonesty.

It applies to Directors, staff, and members. Anybody associated with the Junior League of London who commits fraud, theft, or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

2. Statement of intent

The Junior League of London will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently, and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.

All members of the Junior League of London have a responsibility for putting these principles into practice and for reporting any breaches they discover.

3. Definitions

- a. <u>Fraud</u>: A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either; a member of the public, someone who works for or is a member of the Junior League of London. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud.
- b. <u>Theft</u>: Dishonestly acquiring, using, or disposing of physical or intellectual property belonging to the Junior League of London or to individual members of the organisation.
- c. <u>Misuse of equipment</u>: Deliberately misusing materials or equipment belonging to the Junior League of London for financial or material benefit.
- d. <u>Abuse of position</u>: Exploiting a position of trust within the organisation for financial or material benefit.
- e. <u>Bribery: Offering</u>, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual or the organisation.
- f. <u>Acceptance of donations, gifts, or hospitality:</u> The acceptance of donations, gifts or hospitality or any other benefit which could reasonably be seen as to compromise the individual's personal judgement or integrity.

4. Culture

The Junior League of London fosters honesty and integrity in its entire organisation. Directors, staff, and volunteers are expected to lead by example in adhering to policies, procedures, and practices.

Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Charity.



APPENDIX H

As part of this, the Junior League of London will provide clear routes by which concerns may be raised by Directors, staff, and volunteers.

Leadership Team members (including Committee Chairs and Trustees) are expected to deal promptly, firmly, and fairly with suspicions and allegations of fraud or corrupt practice.

5. Responsibilities

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

a. Board of Trustees:

The Trustees are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Charity's policies, aims and objectives.

The system of internal control is designed to respond to and manage the whole range of risks which the Charity faces.

The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks.

Overall responsibility for managing the risk of fraud has been delegated to the Risk Officer. The day-to-day responsibility has been delegated to the Director of Operations to act on behalf of the Risk Officer.

Their responsibilities include:

- Undertaking a regular review of the fraud risks associated with each of the key organisational objectives.
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- The design of an effective control environment to prevent fraud.
- Establishing appropriate mechanisms for:
 - reporting fraud risk issues
 - reporting significant incidents of fraud or attempted fraud to the Board of Directors;
 - Liaising with the Charity's appointed Independent Examiners.
- Making sure that all staff are aware of the Charity's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud;
- Ensuring that appropriate anti-fraud training is made available to Directors, staff and members as required; and
- Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

b. Executive Committee

In addition to the responsibilities above as part of the Board of Trustees, the Executive Committee is responsible for:

- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively.
- Preventing and detecting fraud as far as possible.
- Assessing the types of risk involved in the operations for which they are responsible.
- Reviewing the control systems for which they are responsible regularly.
- Ensuring that controls are being complied with and their systems continue to operate effectively.
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

c. <u>Staff</u>

Every member of staff is responsible for:

• Acting with propriety in the use of Charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;

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- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- Alerting their manager when they believe the opportunity for fraud exists e.g., because of poor procedures or lack of effective oversight.
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

d. Members

Every member is responsible for:

- Acting with propriety in the use of the Charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers.
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- Alerting the Leadership Team when they believe the opportunity for fraud exists e.g., because of poor procedures or lack of effective oversight.
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

APPENDIX I



Prize Draw Procedural Policy

Objective: This guide is to provide procedures for Prize Draws which is a fundraising tool for the Junior League of London (JLL).

- Note that as of 2021/2022, JLL participates in Prize Draws only and not raffles.
- Prize Draws must be held as part of a wider JLL event rather than standalone.

Required Materials for Prize Draws: Prizes, Prize Draw Tickets, Eventbrite access, Zettle machines or alternative JLL office-approved payment technology.

Procedures:

90 days prior to Prize Draw

- Work with Communications Council to prepare donation solicitation communications.
- Work with Fund Development VP to determine target list of companies for prizes.

60 days prior to Prize Draw

• Solicit for prizes.

30 days prior to Prize Draw

- Launch prize draw ticket sales including free entry option.
 - All tickets must be set at the same price and notice should be made that entrants can enter for free by post.
- Committee to set up site to sell tickets ahead of the event, which must include the following:
 - Prize Draw Ticket Price
 - Draw Time
 - Draw Location
 - Following text

To enter for free by post please send your full name, mobile number, email address, country of residence and date of birth with reference - [Event Name] - Junior League of London Prize Draw to:

Junior League of London CAN Mezzanine 7-14 Great Dover St London SE1 4YR

• Postal entries must arrive within 2 days of the closing date indicated above.

14 days prior to Prize Draw

- Formal Launch of pre-event ticket sales
- Finalise Prize list.
- Promote prizes via social media channels.
- Arrange with JLL office to pick up Zettle machines if required for purchases of additional prize draw tickets at the event.
- Determine who will be pulling Prize Draw and announcing winner.
 - Note: the person pulling the draw should not have tickets in the bucket.

1 day prior to Prize Draw

• Committee member starts populating prize draw ticket book with online orders [if applicable]



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2 hours prior to Event Start

- Complete populating ticket book with online orders
- A separate committee member performs a check of the online sales.
- Committee chair emails the Finance Director, Director of Operations, FDVP, and President-Elect to confirm the number of online ticket sales.
- Ticket stubs are put into the bucket.
- Station is set up with Zettle or equivalent for ticket sales at event.

15 minutes prior to Prize Draw

• Announcement is made that prize draw is closing in 15 minutes.

Prize Draw

• Prize winner's name and number is read. If winner is not there, their prize is set aside to be collected from office.

After Prize Draw

- Committee chair emails the Finance Director, Director of Operations, FDVP, and President-Elect with winner names and contact details, prizes won by each, and total number of tickets sold.
- A count of the tickets is done by 2 people to confirm it aligns with the number of tickets sold. If there's a discrepancy, a reconciliation must be done immediately.

Next Day

- Prize Draw tickets, Zettle machines and not picked up prizes are delivered to office for processing.
- Committee chair reaches out to absentee winner(s) to work agree logistics for pick-up of prizes.

APPENDIX J



Virtual General Meeting Protocols

1.Login time. The Internet meeting service will be available for login no less than 15 minutes before the start of each meeting.

2. **Joining details**. In advance of the meeting, joining details will be made available to members including the time of the meeting, the URL, and codes necessary to connect to the Internet meeting service, and, as an alternative and backup to the audio connection included within the Internet service, the phone number and access code(s) the member needs to participate aurally by telephone. The notice shall also include a copy of, or a link to, these rules.

3. **Signing in and out**. Members shall identify themselves as required to sign in to the Internet meeting service and shall maintain Internet access throughout the meeting whenever present but shall sign out upon any departure prior to adjournment. Members shall also maintain aural participation throughout the meeting (whenever present), either through the use of the member's computer microphone and speakers through the Internet meeting service or through participation in the linked telephone connection.

4. **Quorum**. The presence of a quorum shall be established by roll call at the beginning of the meeting, completed by the Company Secretary comparing the online list of participating members to the Digital Cheetah roster. Thereafter, the continued presence of a quorum shall be determined by the online list of participating members, unless any member demands a quorum count by roll call. Such a demand may be made following any vote for which the announced totals add to less than a quorum.

5. **Technical requirements and malfunctions**. Each member is responsible for her connection to the Internet and telephone conference call; no action shall be invalidated on the grounds that the loss of, or poor quality of, a member's individual connection prevented her from participating in the meeting.

6. **Forced disconnections**. The chair may cause or direct the disconnection or muting of a member's connection if it is causing undue interference with the meeting. The chair's decision to do so, which is subject to an undebatable appeal that can be made by any member, shall be announced during the meeting, and recorded in the minutes.

7. **Assignment of the floor**. To seek recognition by the chair, a member shall use the raised hand feature of the Internet service provider or other designated feature named in the meeting.

9. **Motions submitted in writing**. A member intending to make a main motion, to offer an amendment, or to propose instructions to a committee, shall, before or after being recognised, post the motion in writing to the online area designated by the secretary for this purpose, preceded by the member's name and a number corresponding to how many written motions the member has so far posted during the meeting (e.g., "SMITH 3:"; "FRANCES JONES 2:").

10. **Display of motions**. The secretary shall designate an online area exclusively for the display of the immediately pending question and other relevant pending questions (such as the main motion, or the pertinent part of the main motion, when an amendment to it is immediately pending).



JLL Data Breach Policy

Background

As a charity, information about Junior League of London ("**JLL**") service recipients, volunteers, employees, partners, and service providers are essential to our day-to-day operations.

We all have a responsibility to protect this information from loss or unauthorised destruction, alteration, disclosure, or access, whether due to human error or malicious intent.

Under data protection legislation, JLL must take appropriate organisational and technical measures to prevent such data breaches. Failure to do so can lead to fines of up to €20 million or 4% of annual global turnover (whichever is higher). As well as administrative fines, data protection legislation also provides affected individuals with a right to receive compensation for the damage suffered. Furthermore, data breaches are likely to lead to adverse publicity for, and a loss of trust in, JLL.

All members of JLL including trustees, staff, volunteers, and others acting for or on behalf of JLL are responsible for safeguarding the personal data they process, in accordance with our Data Protection Policy.

Non-compliance with this data breach policy ("**Policy**"), including hindering or causing unnecessary delay to an investigation, may result in disciplinary action in accordance with the appropriate disciplinary policy.

Purpose

The purpose of this Policy is to standardise the JLL's response to any reported personal data breach incident, and ensure all incidents are managed in accordance with legal and regulatory requirements and best practice guidelines, including requirements under the UK General Data Protection Regulation and the Data Protection Act 2018.

Definitions

Data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

Data subject: the individual to whom the personal data relates.

Personal data: any information relating to an identifiable person who can be directly or indirectly identified.

Sensitive/special category personal data: the following types of personal data (specified in data protection legislation) which are particularly sensitive and private in nature, and therefore more likely to cause distress and damage if compromised:

- Racial or ethnic origin
- Political opinions
- Religious beliefs or other beliefs of a similar nature
- Trade union membership
- Physical or mental health conditions
- Sexual life
- Commission or alleged commission of any criminal offence.
- Genetic data
- Biometric data where processed to uniquely identify an individual.



Roles and responsibilities

This Policy applies to all members, volunteers, and employees of JLL.

All members, volunteers and employees are responsible for reporting actual, suspected, threatened or potential information security incidents and for assisting with investigations as required, particularly if urgent action must be taken to prevent further damage.

The Data Protection Officer ("**DPO**) is responsible for ensuring staff, volunteers, and trustees act in compliance with this policy and assist with investigations as required.

If you have any questions, please contact: irleague@jll.org.uk.

Data Breach Management Process Reporting a breach

Confirmed or suspected data breaches should be reported immediately to <u>irleague@jll.org.uk</u> and marked as urgent.

It is important that data breaches are reported to <u>jrleague@jll.org.uk</u> without unnecessary delay so that the seriousness of the breach and further notification requirements can be determined as soon as possible.

To report a breach, complete the incident report form held on the Company Drive. The report should include full and accurate details of the incident including who is reporting the incident and what type of data is involved.

Processors are legally obliged to notify JLL of all data breaches under Article 33(2) of the UK General Data Protection Regulation. Notification must be without undue delay after the processor becomes aware of the breach.

Next steps

JLL will take steps to facilitate:

- 1. Containment and recovery to limit damage as far as possible.
- 2. Assessment of risks to help inform decisions about remedial actions and notification.
- 3. Notification to the appropriate bodies/individuals that a breach has occurred.
- 4. Evaluation of the causes of the incident and the effectiveness of the JLL's response, identifying lessons to be learned.

Once a data breach has been reported an in-depth assessment will be made by DPO (the "**Data Breach Lead**") as soon as possible. The Data Breach Lead will conduct their assessment in accordance with the checklist for data breaches held on the Company Drive.

Unless obliged under a legal, contractual, or regulatory duty, any discussion of the data breach (including the fact that a breach has occurred) is restricted to those directly involved in the investigation. Wider notification must be approved by the Trustees.



JLL Data Protection Policy

The Data Protection Officer is the first point of call for any questions you have regarding Data Protection. If you have any questions or concerns about Data Protection, please don't hesitate to get in touch with the office.

DATA PROTECTION PRINCIPLES

The Junior League of London ("JLL") is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR) as incorporated into UK law and the Data Protection Act 2018 (together the "Data Protection Laws"). The Data Protection Laws require that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Data Protection Laws in order to safeguard the rights and freedoms of individuals;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures;
- g) not transferred to another country without appropriate safeguards being in place; and
- h) made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data.

GOLDEN RULES FOR DATA PROTECTION

- 1. Personal data of Members held by the Junior League of London in our database or anywhere else **shall not be distributed externally without the permission of the Member concerned** (save where legally required).
- 2. Personal data of Members shall be obtained only for use within the League, and for purposes serving the mission of the League, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- 3. Personal data of Members collected by the League shall be **adequate**, **relevant**, **and not excessive** in relation to the mission of the League.
- 4. Personal data of Members **shall not be kept for longer than is necessary** for that purpose or those purposes.
- 5. Personal data of Members shall only **be transferred to a country or territory outside** the UK or the EU when specifically requested by AJLI or any functioning Junior League and in accordance with JLL's privacy notice. Personal data of Members may only be shared with outside individuals or organisations (even in relation to a JLL-related event or activity) in accordance with JLL's privacy notice.



6. Members' **personal data found in the Membership Directory is strictly league business only** and may not be used for the promotion of any unrelated activity, personal gain, or commercial or solicitation purposes.

Infractions of this policy may result in termination of membership.

SHARING PERSONAL DATA

Generally, JLL will not share personal data with third parties unless certain safeguards and contractual arrangements have been put in place.

Personal data should only be shared internally if the recipient has a job/volunteer-related need to know the information and the transfer complies with any applicable cross-border transfer restrictions.

JLL and its members may only share personal data with third parties, such as our service providers, if:

- (a) they have a need to know the information for the purposes of providing the contracted services;
- (b) sharing the personal data complies with the privacy notice provided to the data subject and, if required, the data subject's consent has been obtained;
- (c) the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- (d) the transfer complies with any applicable cross border transfer restrictions; and
- (e) a fully executed written contract that contains approved third-party clauses has been obtained.

DATA SUBJECT RIGHTS

Data subjects have rights when it comes to how JLL handles their personal data. These include rights to:

- (a) withdraw consent to processing at any time;
- (b) receive certain information about the data controller's processing activities;
- (c) request access to their personal data that we hold;
- (d) prevent our use of their personal data for direct marketing purposes;
- (e) ask us to erase personal data if it is no longer necessary in relation to the purposes for which it was collected or processed or to rectify inaccurate data or to complete incomplete data;
- (f) restrict processing in specific circumstances;
- (g) challenge processing which has been justified on the basis of our legitimate interests or in the public interest;
- (h) request a copy of an agreement under which personal data is transferred outside of the UK or EEA;
- (i) object to decisions based solely on automated processing, including profiling;
- (j) prevent processing that is likely to cause damage or distress to the data subject or anyone else;
- (k) be notified of a personal data breach which is likely to result in high risk to their rights and freedoms;
- (I) make a complaint to the supervisory authority; and
- (m) in limited circumstances, receive or ask for their personal data to be transferred to a third party in a structured, commonly used, and machine-readable format.

If you receive a data subject request, you must send it to <u>irleague@ill.org.uk</u> immediately.

It is important that data subject requests are reported without unnecessary delay so that the request can be reviewed and responded to within relevant deadlines imposed by the Data Protection Laws.



DATA BREACH

Confirmed or suspected data security breaches should be reported immediately to <u>irleague@jll.org.uk</u>.

It is important that data breaches are reported without unnecessary delay so that the seriousness of the breach and further notification requirements can be determined as soon as possible.

The report should include full and accurate details of the incident including who is reporting the incident, what type of data is involved and what data subjects have been impacted.

DATA PROTECTION GUIDE FOR MEMBERS

This section sets out your responsibilities as a member, volunteer, or employee of JLL.

General:

- Refuse requests from friends, family or third parties to contact another League Member. Pass on any such requests to the office staff, who will contact the person on your behalf.
- Try and keep your own contact lists as secure and up to date as possible. Only keep contacts for as long as is necessary, and only for purposes relevant to the mission of the League.
- Be aware that the individual about whom information relates has a right to see all the information that is held about them. Therefore, inserting personal remarks/notes on files should be avoided. *This includes emails*.
- You are welcome to distribute the office contact information whenever you think it would be helpful.

Emails:

- Please contact the office if you wish to send out a group (10+) email to members outside your committee.
- Do not copy another Member into an external email without checking with that member first.
- Do not forward any emails containing Member's email addresses or information to anyone outside the League.
- Do not 'pass on' members email addresses to any non-member (even to a friend or colleague) without that Member's written permission.

Telephone:

- Try not to call other Members on their phone when an email would do. Members should be contacted on their work numbers <u>only</u> as a very last resort.
- Do not disclose any personal or sensitive information about any League Member over the phone. If someone calls you asking for information, please refer the caller to the office.

Photos:

- Under no circumstance should you take a picture of a child without written permission from that child's parent or guardian. To arrange this please contact the office.
- If you wish to take photos at a volunteer shift pleases confirm permission with Community Partner prior as some individuals or venues may be sensitive data. You may share photos taken at any volunteer project on your personal social media only with consent of the Community Partner and any individuals in the photo.
- Do not to share photos of League members on your personal social media without having asked that Member in advance.





Member Directory:

The Membership Directory is for your own personal use and should absolutely not be shared with others. Please take steps to ensure that your log-in information remains secure.

Data Collection:

- Only collect personal data for purposes serving the mission of the League. Curiosity doesn't count! Once that purpose has ended, please delete the data as per JLL's Data Retention Policy.
- Let the office know if you are intending to collect any information they may already have it on file. Or they may be able to run a report from our database for you.
- Take steps to ensure that the personal data you use, and hold is accurate, complete, kept up to date and relevant to the purpose for which it was collected.
- Personal data collected from members should be stored securely and passed onto the office at the nearest opportunity. Personal data that is no longer actively required should be destroyed in accordance with JLL's Data Retention Policy.
- Ensure members know exactly why you are collecting their data. You should provide a copy of JLL's privacy notice to members when collecting their data.
- Do not use personal data held for one purpose for a different purpose without the Member's permission.
- Follow all procedures and policies JLL put in place to maintain the security of all personal data from the point of collection to the point of destruction. You may only transfer personal data to third-party service providers who agree to comply with the required policies and procedures and who agree to put adequate measures in place.
- Maintain data security by protecting the confidentiality, integrity, and availability of the personal data, defined as follows:
 - Confidentiality means that only people who have a need to know and are authorised to use the personal data can access it;
 - Integrity means that personal data is accurate and suitable for the purpose for which it is processed; and
 - Availability means that authorised users are able to access the personal data when they need it for authorised purposes.

Other

- If you know or suspect that a personal data breach has occurred, do not attempt to investigate the matter yourself. Immediately contact the office. You should preserve all evidence relating to the potential personal data breach.
- Immediately forward any data subject request you receive to the office.
- Attend all data privacy related training and comply with the requirements of this Policy.

If you have any questions about JLL's Data Protection Policy, please contact the office <u>jrleague@jll.org.uk.</u>



Data Retention Policy

The purpose of this data retention policy ("policy") is to set out the Junior League of London's (the "JLL") approach to managing its information to ensure that data is preserved in line with legal requirements and that data is not retained for longer than necessary.

To comply with the principles of data protection legislation, the JLL will:

- only keep information for as long as there is a need;
- keep records secure, whether electronic or paper;
- ensure records are retrievable and easily traced; and
- allow a person access to information held about them, should they request it.

How long do we keep your information?

We keep records of your personal data only for as long as necessary to fulfil the purposes we collected it for; outside of membership related purposes this includes such purposes as satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please see the Schedule to this policy for an indication of specific data retention periods that are typically applied to relevant categories of data.

Please note that certain records may be relevant to current litigation or contemplated litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, in which case such records will be preserved and not deleted, disposed, destroyed, or changed. Preserving documents includes suspending any time periods in the Schedule and preserving the integrity of the electronic files or other format in which the records are kept.

Membership Directory

As a membership organisation, members' personal data is available internally on the Membership Directory. When the membership at the league ends (through Transfer, RIGS or Dropped) the data is restricted and no longer accessible on the Directory. This information will still be available to the JLL office should we need to identify or re-join a member. After membership ends, only minimal data will be retained for identification purposes.

Disposal of Data

Once it is no longer necessary to retain the data for the purpose it was collected, it will be securely disposed of.

Privacy assessments & Your Rights

Eraser and Anonymization of Data

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



The JLL will continue to assess how personal data will be processed and erased when new projects or surveys are being conducted.

Subscription to JLL Mailing Lists

As a member of the JLL you will be signed up to receive our JLL Journal. You can unsubscribe at any time during this period.

There are some mailings that are your membership right and/or requirements to receive, such as Voting Options and Dues Letters. If you have unsubscribed from any of our mailing lists, we may forward these mailings to you directly from the Office so as to ensure you don't miss them.

Contact

If you have any queries on our Data Retention Policy, please contact the Office via <u>jrleague@jll.org.uk.</u>



JLL Data Subject Rights Policy

Background

Under the General Data Protection Regulation (as incorporated into UK law) ("**UK GDPR**") and the Data Protection Act 2018 ("**DPA**"), individuals ("**data subjects**" under the UK GDPR) have certain rights in relation to their personal data.

In summary, data subjects have following rights to:

- o Information;
- o Access their own personal data;
- Correct personal data;
- Erase personal data (also known as the right to be forgotten);
- Restrict data processing;
- Object to data processing;
- o Receive a copy of their personal data or transfer their personal data to another data controller;
- Not be subject to automated decision-making.

Definitions

Data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

Data controller: means the natural or legal person that determines the purposes and means of processing personal data (defined below), or JLL.

Data subject: the individual to whom the personal data relates.

Personal data: any information relating to an identifiable person who can be directly or indirectly identified including names of individuals, postal addresses, email addresses, telephone numbers, and any other information relating to individuals.

Sensitive/special category personal data: the following types of personal data (specified in data protection legislation) which are particularly sensitive and private in nature, and therefore more likely to cause distress and damage if compromised:

- Racial or ethnic origin;
- Political opinions;
- Religious beliefs or other beliefs of a similar nature (e.g., philosophical beliefs);
- Trade union membership;
- Physical or mental health conditions;
- Sexual life (including sexual orientation);
- Commission or alleged commission of any criminal offence;
- Genetic data; and
- Biometric data where processed to uniquely identify an individual.

Processing: means any operation or set of operations performed on personal data, whether or not by automated means, such as collection, use, storage, dissemination, and destruction.

Purpose

The Junior League of London ("JLL") has adopted this Data Subject Rights Policy (the "**Policy**") to address procedures for handling data subject requests and objections under the UK GDPR when we act as a data controller.

This Policy applies to all members, volunteers, employees, and trustees of JLL.



It applies to all personal, sensitive, and special category data that JLL holds relating to identifiable individuals.

The Data Protection Officer ("**DPO**") is responsible for ensuring members, volunteers, employees, and trustees act in compliance with this Policy. The DPO is responsible for handling data subject requests.

Data Subject Rights

Information Right

Data subjects will have the right to receive certain information about JLL's personal data collection and data processing activities. This right forms part of JLL's obligation to ensure fair and transparent processing of personal data.

As a data controller, where JLL collects personal data directly from a data subject, it must first inform the data subject about:

- o JLL's identity and contact details;
- The purposes for processing any personal data collected;
- The legal basis for processing;
- o Identification of JLL's legitimate interests when they serve as the legal basis for processing;
- o Recipients or categories of recipients of the personal data, if any;
- Intention to transfer personal data outside of the UK and the data transfer mechanism used to legalise the transfer where applicable;
- o Retention period of personal data or criteria used to determine retention periods;
- Whether the data subject must provide the personal data by statute, contract, or for another reason, and the consequences of not providing the personal data;
- Use of automated decision-making, including profiling, the auto-decision logic used, and the consequences of this processing for the data subject; and
- The data subjects' rights including:
 - o rights of access, correction, erasure, objection, and data portability;
 - o the right to withdraw consent and how to exercise that right; and
 - the right to make a complaint to the Information Commissioner's Office.

If JLL intends to use the personal data for a purpose other than it originally collected it for, it must provide notice of the new purpose to the data subject before processing and may need to obtain further consent (which is freely given and fully informed) if there is no other processing ground.

Access Right

The right of access, commonly referred to as data subject access, gives individuals the right to obtain a copy of their personal data, as well as other supplementary information. It helps individuals to understand how and why data controllers are using their data, and check they are doing it lawfully.

Further information on JLL's procedure for complying with a data subject access request is set out below.

Correction Right

JLL will need to ensure that personal data is accurate, up to date and erased or corrected when inaccurate.

Data subjects have a right to have any inaccurate personal data corrected and complete incomplete personal data held by JLL as a data controller.

Where a correction request is made, JLL will ensure that the personal data is rectified without undue delay unless a lawful basis exists for denying such a request (see below in relation to the erasure right).



Erasure Right

A data subject has the right to request erasure of their personal data if one of the following applies:

- The personal data is no longer necessary for the purpose for which it was collected;
- If consent was provided and the data subject withdrew its consent to the processing activities and no other legal justification for processing applies;
- The data subject objected to processing that is either:
 - necessary for JLL to perform a task in the public interest or in the exercise of official authority vested in JLL;
 - o necessary to pursue JLL or a third party's legitimate interests; and
 - o no other compelling legitimate grounds to process personal data apply.
- The data subject objects to processing for direct marketing purposes;
- o JLL as a data controller unlawfully processed the personal data;
- o UK law requires erasure to comply with a legal obligation that applies to JLL; or
- o JLL collected the personal data in the context of offering online services to children.

Once a data subject requests erasure for one of the statutory reasons, JLL shall erase it without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation;
- The performance of a task carried out in the public interest;
- Exercising official authority vested in the data controller;
- Public health reasons consistent with the exceptions for processing sensitive personal data;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; or
- The establishment, exercise, or defence of legal claims.

If JLL made the personal data public, it will need to take reasonable steps, including technical measures, to inform other data controllers about the data subject's erasure request. This will include removing any links to, or copies of, the personal data.

JLL will determine whether there is a basis not to respond to a data subject erasure request. JLL shall inform the data subject of the reason(s) for not acting and of the possibility of lodging a complaint with the supervisory authority and seeking a judicial remedy.

Data Processing Restriction Right

Data subjects have the right to restrict the processing of their personal data when:

- The data subject contests the accuracy of the personal data;
- The processing is unlawful;
- JLL as a data controller no longer needs to process the personal data but the data subject needs the personal data for the establishment, exercise, or defence of legal claims; or
- The data subject objects to processing that relies on the public interest of JLL or a third party's legitimate interests as the lawful processing grounds.

JLL must determine if it has a basis not to respond to the data processing restriction request. JLL must inform the data subject of the reason(s) for not acting and of the possibility of lodging a complaint with the supervisory authority and seeking a judicial remedy.

When a data subject requests a data processing restriction, JLL may continue to store the personal data, but may only process it:

- With the data subject's consent;
- To establish, exercise, or defend legal claims;
- To protect the rights of another individual or legal entity; or
- For important public interest reasons



Before lifting the data processing restriction, JLL will need to notify the data subject. JLL may lift the processing restriction:

- when JLL verifies the accuracy of the personal data that is subject of the processing restriction request; or
- where JLL determines that its or a third party's legitimate interests override the data subject's
 interest if a data subject objects to the processing for purposes JLL consider necessary to
 perform a task in the public interest or for purposes which JLL consider necessary for its or a
 third party's legitimate interests.

Data Processing Objection Right

Data subjects have the right to object to data processing under certain circumstances, including:

- For direct marketing purposes;
- For scientific or historical research purposes or statistical purposes, unless the processing is necessary for the performance of a task carried out in the public interest;
- For processing, including any profiling, based on the following legal grounds:
 - o necessary to perform a task in the public interest; or
 - o necessary for the data controller's or a third party's legitimate interests.

If the data subject objects to processing, JLL shall stop processing the personal data unless JLL either demonstrates a compelling legitimate ground for processing the personal data that overrides the data subject's interests or needs to process the personal data to establish, exercise, or defend legal claims.

Data Portability Right

The data subject's right to data portability includes the right to:

- Receive a copy of the personal data from JLL as a data controller in a commonly used and machine-readable format;
- Transmit the personal data to another data controller; and
- Have its personal data transmitted directly from one data controller to another where technically possible.

However, the data portability right only applies to personal data which is about the data subject and provided to JLL by the data subject. The right also only applies to automated data processing that is either based on a data subject's consent or is necessary to perform a contract between the data controller and data subject.

JLL must determine if it has a basis not to respond to a data portability request. JLL must inform the data subject of the reason(s) for not acting and of the possibility of lodging a complaint with the supervisory authority and seeking judicial remedy.

JLL may refuse to respond to a data subject portability request if responding to the request adversely affects the rights and freedoms of others.

Automated Decision-Making Objection Right

Data subjects have the right not to be subject to automated decision-making, including profiling, which has legal or other significant effects on the data subject.

This data subject right does not apply when the automated decision is:

- Necessary for entering into or performing a contract with the data subject;
- Authorised by law applicable to JLL as a data controller;
- If the law requires suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- Based on explicit data subject consent.



JLL must determine if it has a basis not to respond to the data subject's automated decision-making objection. JLL must inform the data subject of the reason(s) for not acting and of the possibility of lodging a complaint with the supervisory authority and seeking judicial remedy.

Exemptions in respect of Data Subject Rights

The data subject rights described above are subject to certain exemptions. Under these exemptions, the data subject rights will not be applicable in respect of personal data processed for the following purposes:

- The prevention or detection of crime, apprehension or prosecution of offenders, or the assessment or collection of a tax or duty or an imposition of a similar nature;
- The maintenance of effective immigration controls, or investigation or detection of activities that would undermine the maintenance of effective immigration control; or
- The discharging of a function designed to protect the public or certain other specified functions, to the extent that the application of the data subject rights would be likely to prejudice these matters.

The data subject rights will also not be applicable to personal data which is:

- Consisting of information that JLL as a data controller is obliged by law to make available to the public;
- o Required to be disclosed by an enactment, rule of law or order of the court;
- Required to be disclosed as is necessary for the purpose of, or in connection with legal proceedings (including prospective legal proceedings), is necessary for the purpose of obtaining legal advice, or is otherwise necessary for the purposes of stablishing, exercising, or defending legal rights,

to the extent the application of the data subject rights would prevent JLL from complying with those obligations.

Right of access exemptions

The DPA also allows for certain restrictions on data subjects' rights of access and certain exemptions from the right of access to personal data. These exemptions include:

- the protection of the rights of others;
- legal professional privilege;
- self-incrimination;
- corporate finance;
- management forecasts;
- negotiations; and
- confidential references.

Data controllers are also exempt from the requirement to provide a copy of the data requested by the data subject where it is "*manifestly unfounded*" or "*manifestly excessive*".

Data Subject Access Request Procedure

Receiving a data subject access request ("DSAR")

A DSAR request from an individual for information that JLL holds about them may be made verbally or in writing. A template written request form can be found in Appendix 1. Any JLL volunteer, employee or trustee who receives a request should forward it to the DPO immediately. If an oral data subject request is made, the receiving volunteer, employee or trustee should direct the data subject to submit the DSAR using JLL's template request form (as noted above, available at Appendix 1).

JLL may require verification of the individual's identity if there is any doubt as to identity.



JLL shall notify the data subject that the request has been received. Under the UK GDPR, a response must usually be provided within one calendar month of receipt. A log of the date the request was submitted must be made by DPO. JLL can extend the deadline to respond if the request is complex by a further two calendar months, but the individual must be informed of the extension within the first calendar month and of the reasons for the extension.

Information that must be provided

JLL must provide the following information without delay and within the applicable deadline:

- (a) The purposes of the processing.
- (b) The categories of personal data concerned.
- (c) The recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations.
- (d) Where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period.
- (e) The right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing.
- (f) The right to lodge a complaint with the supervisory authority.
- (g) Where the personal data is not collected from the data subject, any available information as to its source.
- (h) The existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- (i) If the data controller transfers the personal data to a third country or to an international organisation, they must inform the data subject of the appropriate safeguards in relation to the transfer.

Providing a copy of personal data

JLL must also provide the data subject with a copy of their personal data. The first copy of the information must be provided free of charge. For any further copies requested by the data subject, JLL may charge a reasonable fee based on administrative costs.

The DPO is responsible for reviewing the personal data relevant to the DSAR and determining if any exemptions to disclosure (as set out above) apply. Any personal data not subject to an exemption must then be disclosed to the data subject. If an exemption applies, the data subject must be informed of the applicable exemption.

If the data subject makes the subject access request by electronic means, and unless otherwise requested by the data subject, JLL shall provide the information in a commonly used electronic form.

Charging a fee

JLL is not entitled to impose a charge for providing access to an individual's personal data unless he or she is requesting further copies, in which case we may charge a reasonable fee.

Making a complaint

Individuals have the right to make a complaint either to JLL or to the Information Commissioner's Office ("**ICO**"). The ICO can launch an investigation into any complaint and/or can issue a significant penalty against JLL.

Individuals can also bring claims for breaching the UK GDPR/DPA. JLL must, therefore, deal with DSARs promptly and thoroughly.

Any questions on this procedure or a DSAR should be referred to the DPO.



HSBC Online Banking Protocols

The primary function for online banking is the need to monitor the HSBC regularly efficiently through remote digital means. The HSBC online payments function will only be used when CAF banking is unavailable.

The following protocols are to be observed when conducting financial transactions with HSBC online banking:

I. Financial Limitations and Capping

The daily cap limit for online payments with HSBC banking will be £1,000.

II. Signatories

HSBC online banking has a Primary (Director of Operations) and Secondary (Finance Director) user.

Primary Users have the ability to set up and approve transactions in one step.

Secondary Users can either setup or approve transactions but cannot do both in one step.

In line with clause 7.E of the Ops, the Primary User may set up transactions within HSBC online but cannot approve them up. Approvals will be done by the Secondary User

APPENDIX M



Tainted Donations Policy

The Finance Act (FA) 2011 introduced legislation to deter abuse of the charity tax reliefs and is intended to identify donors (or persons connected to them) who have made a donation with the purpose of receiving an advantage from the charity.

The Tainted Charity Donations rules are based on a purpose test which considers the effects of, and circumstances in which the donor or someone connected to the donor, entered into arrangements to make the donation, and to whether those arrangements are deemed to obtain a financial advantage.

The following 3 conditions must be met for a donation to be a tainted charity donation.

Where all 3 conditions are satisfied, the donor loses any tax relief that they would have been entitled to claim, had the donation not been tainted. An additional charge to tax may also arise where the donation would have been eligible for relief under the Gift Aid scheme (for individual donors only).

The three conditions which must be met for a donation to be tainted are:

The donation to the charity and arrangements entered into by the donor are connected.

The main purpose of entering into the arrangements is for the donor, or someone connected to the donor, to receive a financial advantage directly or indirectly from the charity.

The donation is not made by a qualifying charity-owned company or relevant housing provider linked with the charity to which the donation is made.

The types of donations covered by the legislation include Gift Aid donations, payroll giving, gifts of trading stock, and gifts of shares, securities, and property.

The tainted charity donations rules do not apply to:

a simple donation to charity where no additional arrangements are entered into.

a donation under Gift Aid that is within the Gift Aid benefit limits.

a donation, any benefit of which has been taken into account in calculating the relief due for donations to charity of shares, securities and real property, or trading stock.

If any member or employee is concerned that any donation made to the Junior League of London could be a tainted donation, they must immediately raise the issue to the Finance Director, Operations Director & President Elect.

The policy should be reviewed every three years by the Finance Director. The last review was completed in March 2023.