

**Imperial College Union
Finance & Risk Subcommittee / 14 October 2020**

Corporate Policies Review Schedule

- Author(s): Dr Tom Flynn (Managing Director)
Jayne Hufford (Head of Finance)
Tom Newman (Head of Membership Services)
Ashley Cory (Systems Manager)
- Purpose: This paper sets out a range of policies that the Union needs to develop and approve over the coming year. They are all directly related to key areas that will be included in the Strategic Risk Register to be considered in December.
- Decision(s): To consider the range of policies and approve the timeline for their development and ratification.

1. Context

ICU is in a period of significant flux, as we both respond to the implications of the COVID-19 pandemic, as well start a period of strategy development to commence our long-term transformation. One of the key areas where the organisation must improve is in our policies and processes – mapping them out more clearly and reviewing them more regularly to make sure they are fit for purpose. Additional to this, as we look to develop a formal approach to risk management, there are a number of key areas that will need significant improvements to how we work. These are likely to be as follows:

- i. Finance
- ii. Health & Safety
- iii. Legal (including Data Protection)
- iv. Human Resources
- v. Operational

As the Union develops over the coming year, we need to consider how we tackle this list. It is clear that the top three need significant attention in the short to medium term, whilst the latter two should be considered as we move through our strategic review and a new annual planning round.

2. Review Approach

Each policy will be developed using an approach based on the following key principles:

- i. Consultation: we must ensure that policy development is undertaken in a consultative manner, to ensure that those involved in the day-to-day operation are able to provide critical feedback on key aspects.
- ii. Fit for purpose: we must ensure all policies are right for ICU and that they consider the specific features of the organisation. This also means conforming to generally accepted principles where appropriate, and regulatory bodies such as the Charity Commission.
- iii. College and sector alignment: where possible and appropriate, we should look to align with the College and wider Students' Union sector. In some areas, for example health and safety, this will be required.
- iv. Clarity and conformity: we should use a common structure and document template that makes it easy for all stakeholders to understand and engage with the substance.

- v. Clear communication: once approved we should ensure that policies are effectively disseminated amongst staff and students to ensure compliance. This will mean training and other documentation will need to be updated.

We have built a specific channel using Microsoft Teams to act as a 'Policy Hub' once each is confirmed. This will act as a formal central repository for the Union. It will also ensure that policies are reviewed and updated regularly.

3. Financial Management

The current financial procedures handbook is attached as Appendix One to this paper and was last reviewed in 2015/16. It is very clear that the Union has moved on since it was developed, and there are areas that need significant review.

Staff Lead: Managing Director / Head of Finance
 Officer Lead: DP Finance & Services

Policies to be Developed

Policy	Key Comments / Actions
Financial Procedures Handbook	This should be simplified and made more operational in nature. It should act as a hub, pointing to other policies that are reviewed regularly as part of the governance of the Union.
Reserves Policy	This should be risk-based, and is now being considered by the wider Board.
Capitalisation & Depreciation Policy	This should reflect the fact that large scale capital expenditure is often ring-fence funded by the College. It should increase the level at which we capitalise assets.
Procurement Policy	This should set thresholds that require competitive tender processes for high value contracts and purchases.
Financial Controls & Thresholds Policy	This should be reviewed in order to reduce the burden on OTs and Senior Staff to approve low level expenditure. It should also factor in a revised process for bank payment authorisations.
Cash Handling & Management Policy	This should consider changes to our operation, re-establishing the ability to take cash in our commercial operation at key points in the year (for example the start of term, BBC Proms).
Anti-Bribery, Fraud and Suspicious Activity Policy	This should be based on the College's policy.
Staff & Volunteer Expenses Policy	This should ensure we are treating all staff and volunteers equitably, setting clear guidelines for what counts as a 'reasonable' expense.
PCIDSS Compliance Policy	This should be based on the College's policy, given the most significant risks are IT associated.
Grant Policy	This should be developed by the team supporting CSPs, but would also span our finance operation.
Credit Control & Bad Debts	This should include a formalised process for how we chase bad debt, and what steps we take to escalate where payments are not made.

4. Health & Safety

The overarching Health & Safety Policy for the Union was revised and approved in June 2020, alongside a detailed action plan. This is included as Appendix Two to this paper. However, since this date the Union has undergone significant staffing and operational changes. It now needs to be reviewed alongside the development of a suite of additional policies.

Staff Lead: Head of Membership Services / Venue Operations Manager

Officer Lead: DP Finance & Services

Policies to be Developed

Policy	Key Comments / Actions
Fire Safety Policy & Evacuation Procedure	This is likely to be based entirely on the College's current policy given the spaces that we occupy are College property.
First Aid at Work Policy & Procedure	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Risk Assessment Policy & Procedure	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities. CSP activities will be a crucial aspect of this policy.
Display Screen Equipment Policy and Procedure	This is likely to be based entirely on the College's current policy given the spaces that we occupy are College property.
Accident/Incident Investigation and Reporting Procedure	This is likely to integrate with the College's current policy and process, taking into consideration the activities of CSPs.
Control of Substances Hazardous to Health Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Manual Handling Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Verbal & Physical Abuse Policy	This should specifically consider the operation of our venues and late-night entertainment.
Working at Height Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Personal Protective Equipment Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Lone Working Policy	Likely to be based entirely on the College's current policy given the current employment practices.
Homeworking Policy	Likely to be based entirely on the College's current policy given the current employment practices.
Driving and Vehicle Safety Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.

Maintenance of Portable and Transportable Electrical Equipment Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Body Spillage Procedure	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Slips, Trips and Falls Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Noise Exposure Control Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Working Safely in Confined Spaces Policy & Procedure	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Workplace Temperature Policy	This should be based on other students' unions and the College's approach, taking into consideration our own services and activities.
Safeguarding Policy	This should closely align with the wider work being undertaken by the College, who have a senior staff lead for it.

5. Data Protection

A review of our data protection policies and processes were undertaken in March 2020 by the Systems Manager, looking at all areas required by the Information Commissioner's Office for GDPR compliance. A copy of this report is attached as Appendix Three to this paper.

Staff Lead: Systems Manager / Managing Director
Officer Lead: DP Finance & Services

Policies to be Developed

Description	Comments / Actions
Data Protection Policy	This should create and implement a general data protection policy for ICU (include responsibility, method of maintaining and processes of monitoring compliance). It should be adapted from other students' unions to capture best practice.
Information Asset Register (IAR)	This should create one clear unified IAR, review all records and implement process to enforce data retention schedules. There should be an annual check on retention.
Data Sharing Agreement (DSA)	This should implement a formal DSA with the college and any other known third parties. Completed DSAs should be kept in a single central location and subject to a regular review schedule.
Privacy Statements	This should include a refresh of our privacy statements to ensure they are kept up-to-date.
Data Protection Impact Assessments (DPIAs)	This should establish a clear process for conducting DPIAs for any major changes.

6. Timeline & Process

Due to staff capacity it is proposed that we take a 'gathered field' approach to the development and approval of these policies. Each meeting of Finance & Risk this year should have a thematic focus and act as the approval body. Members should be given an opportunity to feedback on drafts in advance of the meetings to ensure discussion is focussed and changes agreed within the meetings are as minimal as possible.

Health & Safety	03 February
Finance	10 March
Data Protection	09 June

Appendix One: Current Financial Procedures Manual
Appendix Two: Current Health & Safety Policy
Appendix Three: GDPR Review May 2020