

Greig Melville
Human
Resources



SCOTTISH
GLIDING CENTRE



YOUR HANDBOOK



Volunteers Handbook

Contents

1. **Welcome to the Club**
2. **Joining our Club as a Volunteer**
3. **Severe Weather & Disruption to Travel**
4. **Bribery Policy**
5. **Child Protection Policy**
6. **Data Protection Policy**
7. **Drugs and Alcohol Policy**
8. **Equal Opportunities Policy**
9. **Harassment and Bullying Policy**
10. **Health, Safety & Wellbeing Policies**
 - **Health & Safety Statement**
 - **British Gliding Association Health & Safety**
 - **Controlling Risk of Infectious Diseases Policy**
 - **Pandemic Recovery Policy & Plan**
 - **Wellbeing Policy**
11. **Social Media Policy**
12. **Whistleblowing Policy**

Welcome to the Club



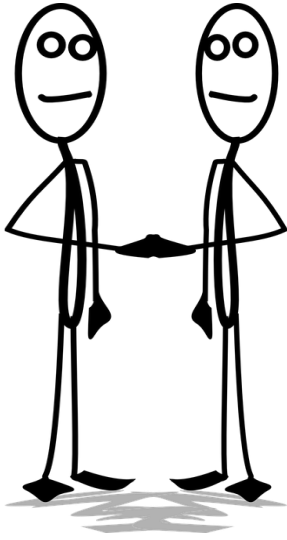
SCOTTISH GLIDING CENTRE

Dear Club Volunteer,

At the Scottish Gliding Centre, we recognise and value the important contribution volunteers make to the Club. A Scottish Gliding Centre volunteer is a person who of their own free will contributes gifts of time and skill for the benefit of the Club and local community, without financial gain, in our offices and/or in the community. The skills volunteers bring range from the routine to the highly specialised. All volunteer skills, experience and attributes will be valued and matched to the needs of the Club. In return for volunteering, the Club will treat all volunteers fairly and with respect.

Volunteers are extremely important to the Scottish Gliding Centre. Support from volunteers helps us to maximise our potential. Practical help from volunteers brings a variety of skills and experience to the Club and enables us to provide additional services.

Reiner Kipp
Board Chair



Joining our Club as a Volunteer

STATEMENT OF PURPOSE

The purpose of this policy is to clarify the terms on which volunteers carry out tasks for the Club. The policy does not constitute, either implicitly or explicitly, a binding contract of employment or a contract for services. The Club reserves the right to change any aspect of this policy at any time.

INDUCTION

At the start of your Volunteering with the Club we will work through a health and safety induction with you, when all our procedures will be explained to you.

DEFINITION OF “VOLUNTEER”

A volunteer is someone who, without compensation or expectation of compensation beyond reimbursement of expenses incurred in the course of their volunteer duties, performs a task at the direction of and on behalf of the organisation. Volunteers are not employees of the organisation and do not work under a contract for services. They undertake to carry out specific tasks on behalf of the organisation but are under no obligation to offer their services. Similarly, the organisation is not obliged to offer them work.

SMOKE FREE ENVIRONMENT

Smoking is not allowed in the majority of enclosed public places throughout the UK, to protect people from the harmful effects of passive smoking. Accordingly, the Club operates a smoke-free policy which extends to e-cigarettes.

CONFLICTS OF INTEREST

Any volunteer, who has a conflict of interest with any activity or programme of the Club, whether personal, philosophical, or financial, must declare this to the Board.

CONFIDENTIALITY AND THE DATA PROTECTION ACT 2018

The Club is registered under the Data Protection Act 2018. Volunteers are responsible for maintaining the confidentiality of all proprietary or privileged information to which they are exposed while serving as a volunteer, whether this information involves a member of staff, volunteer, service users or other person, or involves the overall business of the Club.

Failure to maintain confidentiality will be treated seriously.

DRESS CODE

As representatives of the Club, volunteers, like staff, are responsible for presenting a good image to clients and to the community and must dress appropriately for the conditions and performance of their duties.

CRIMINAL RECORD CHECKS

As appropriate for the protection of Club members, volunteers in certain assignments may be asked to submit to a criminal record check. Volunteers who do not agree to the background check may be refused the assignment.

ENDING THE AGREEMENT

The Club may find it necessary to end this agreement if the volunteer commits any of the following:

- gross misconduct or insubordination
- being under the influence of alcohol or drugs
- theft of property or misuse of the organisation's equipment or materials
- abuse or mistreatment of clients or members.
- failure to abide by its policies and procedures.
- failure to meet standards of performance.
- failure to perform assigned duties satisfactorily.

Note:

This list is not exhaustive.

REASONABLE EXPENSES

Volunteers are eligible for reimbursement of reasonable out-of-pocket expenses incurred while undertaking business for the organisation and they are encouraged to claim their expenses in order to ensure that the true cost is reflected in project accounts. Prior approval must be sought for any major expenditure, and receipts must always be submitted in support of claims.

INSURANCE

Personal liability and accident insurance is provided for all volunteers engaged in the Club's business (excluding normal motor insurance).

HEALTH AND SAFETY

The Club's health and safety policies apply to volunteers. During the induction, volunteers will receive training in the hazards and risks relevant to their project or placement.

Severe Weather & Disruption To Travel Policy

INTRODUCTION

The Club recognises that volunteers may sometimes experience problems travelling to and from the airfield during periods of severe weather conditions or major disruptions to public transport e.g., train strikes.



HEALTH AND SAFETY

The Club is committed to ensuring, so far as reasonably practicable, the health, safety, and welfare of all its volunteers and this includes during severe weather conditions and where there are major disruptions to public transport. Therefore, a reasonable approach will be taken to the situation. Volunteers are reminded of their duty to take reasonable care of their own health and safety and that of other people who may be affected by their acts or omissions.

This includes taking extra care when travelling to and from the airfield in severe weather conditions and allowing more time for journeys, including making alternative travel arrangements where appropriate.

This policy applies where it becomes impossible or dangerous for volunteers to travel into the airfield because of:

- extreme adverse weather such as heavy snow.
- industrial action affecting transport networks.
- major incidents affecting travel or public safety.

MET OFFICE RED ALERTS

When the Met Office issues a 'red alert', this should supersede all other scenarios described above and requires everyone to take action to keep themselves and others safe from the impact of the weather. A 'red alert' is the most serious kind of weather warning that the Met Office can issue and means that widespread damage, travel and power disruption and risk to life is likely. When this situation arises, volunteers should be advised to remain at home until the red alert is lifted.

Bribery Policy

OVERVIEW

This policy outlines the responsibilities of the Club (and everyone who works for us) to adhere to the high standards we have set for conducting our business affairs. You will find specific guidance in this policy on recognising and addressing bribery and corruption, whether in the UK or overseas. The standards detailed in this policy apply equally to activities conducted inside or outside the UK; we do not adopt 'local standards' overseas if they are lower than UK standards.

The policy applies to all employees, contractors, consultants, officers, interns, volunteers, casual and agency workers, and anyone else under our control.

If you breach this policy, we may take action against you, which could lead to terminating your volunteer agreement. You may also be committing a criminal offence.



OUR COMMITMENT AND YOUR OBLIGATIONS

As a Club, we are committed to integrity and fairness across all our operations. We do not tolerate bribery or corruption.

If you are engaged by the Club, or are in any other way under our control, you must help prevent and detect bribery or corruption in our business.

You must report any conduct or activity that you believe or suspect amounts (or could in the future amount) to bribery or corruption to a Club board member. Our Whistleblowing Policy has more information about raising these types of concerns.

Any report will be taken extremely seriously. We will not treat you unfavourably for having refused to become involved in bribery or corruption or for flagging up your concerns to us in good faith. If you do suffer any negative treatment in this context, you must talk to a Club Board member. If you are not satisfied that the issue has been resolved, you could raise a grievance under our Grievance Policy.

You must not threaten or otherwise treat badly anyone who refuses to become involved in bribery or corruption or who has reported or is considering reporting a bribery or corruption-related issue to us.

WHAT IS BRIBERY?

We define bribery as a reward or inducement for acting improperly, illegally, or unethically to gain an advantage, whether personal, commercial, or regulatory. You do not need to have given or received the reward or inducement for this process to amount to bribery.

A bribe does not need to involve the promise, or actual payment, of money — offering hospitality, entertainment or gifts can also be classed as bribery if the purpose is to exert influence.

You could face up to 10 years in prison for offering, promising, giving, asking for, or accepting a bribe as this is a criminal offence. We may also face sanctions as a Club if we don't stop bribery taking place. This can include an unlimited fine and being excluded from public contract tenders.

This list includes the most common actions we consider to be bribery, but it doesn't cover everything. You must not become involved in any of these things or allow anyone else to become involved in them on your behalf. They are:

- Promising, offering, or giving money, hospitality, or gifts in the expectation of receiving a business advantage or because you have already received that advantage.

- Accepting or giving hospitality or gifts during commercial negotiations of any kind, including tender processes, if there is any uncertainty about whether doing so could have an impact on the outcome.
- Accepting money, gifts, or hospitality from anyone you suspect is seeking a business advantage in return.
- Accepting hospitality that is excessively extravagant for the context in which it is offered.
- Offering gifts to government or other officials, political parties, and individual politicians.
- Receiving gifts from government or other officials, political parties, and individual politicians.
- Offering or receiving gifts in return for the faster or smoother conclusion of a routine transaction or process.
- Retaliating against or threatening anyone who refuses to take part in bribery.
- Retaliating against or threatening anyone who raises concerns under the policy; and
- Taking part in any other activity or process that might otherwise breach this policy.

WHAT IS CORRUPTION?

We define **corruption** as the abuse of power, authority, or position in return for some personal advantage.

WHAT IS ALLOWED?

Offering or receiving hospitality and entertainment from third parties is allowed under this policy if it is appropriate and reasonable in the circumstances and the purpose is to:

- build or maintain business relationships.
- enhance or maintain our reputation; or
- help market our products and services more effectively.

You may also give and accept gifts, but only if:

- you have the board's prior approval each time.
- it is not being done to influence a business decision.
- you are not giving or receiving the gift as a reward for new business or to retain existing business.
- you are not giving or receiving the gift in return for any other benefits or favours.
- you are giving the gift on behalf of the Club (it must not be in your own name).
- you are not giving cash or any kind of cash equivalent, such as vouchers.
- your gift is appropriate in the context - for example, a small gift at Christmas.
- it's not being done in secret; and
- you are complying with local laws.

You can reimburse a third party for business-related expenses — the costs of attending a meeting, for example — and you can also accept a third party's offer to pay your expenses. This will not normally be bribery. However, a payment made or received that exceeds reasonable or genuine business expenses is not acceptable. An example would be payment for an extended stay in a hotel, before or after business had been concluded.

WHAT ARE KICKBACKS AND FACILITATION PAYMENTS?

We don't make or receive kickbacks or facilitation payments.

We define kickbacks as payments made in return for a business advantage or favour.

We define facilitation payments as unofficial (and usually small) payments, made to speed up or smooth out a routine process or activity. They are sometimes described as 'back-handers', and



recipients typically include government or other officials.

You must avoid being put in a position where you might be asked to make or accept a kickback or facilitation payment on our behalf. You must also avoid being put in a position from where it could be inferred that such a payment was available.

If anyone asks you to make a payment on behalf of us, you must consider carefully whether what they are asking for is in proportion to the goods or services involved. Always get a receipt, and if you have any concerns, you must discuss them with a board member straight away.

KEEPING RECORDS

You must keep written records of any gifts or hospitality you have given or received and declare these. All associated expenses claims must give full details of the reason for the expenditure and must be submitted in line with any rules we have on expenses.

Invoices and other records relating to third-party dealings, including those with customers and suppliers, must be accurate and complete. You must never maintain 'off-book' accounts to conceal or facilitate payments of any kind.



Child Protection Policy and Procedures

STATEMENT OF PURPOSE

The Scottish Gliding Centre (SGC) child protection policy and procedures aim to:

- Establish clear lines of communication for any child protection issue
- Avoid confusion for instructors, officials, clubs and volunteers

There is a considerable body of legislation, government guidance and standards designed to ensure that children are safeguarded from harm.

Everyone who works with or around children, young people and vulnerable adults needs to be aware of the laws that aim to protect children from harm. Should you have any queries relating to this policy, please contact any of the following individuals:

BGA Child Protection Leader Tel: 07880 547 176

BGA Office Tel: 0116 289 2956

If you should have any concerns about the immediate safety of a child or vulnerable adult you should not delay: Children's Services and Police are always available.

POLICY STATEMENT

SGC Duty of Care

The SGC recognises that sport can and does have a very powerful and positive influence on young people. Not only can it provide opportunities for enjoyment and achievement; it can also develop valuable qualities such as self-esteem, leadership, and teamwork. These positive effects can only take place if sport is in the right hands – in the hands of those who place the welfare of all young people first and adopt practices that support, protect, and empower them.

Most youngsters happily and safely participate in sport under the watchful and concerned care of dedicated instructors and club members. However, the reality is also that abuse does take place in sport. Every adult has a legal and moral responsibility to protect young people participating in our sport from abuse.

The SGC recognises that we have a duty of care towards young and vulnerable participants and can help to protect them from abuse. The SGC recognises that for Child Protection purposes, a child refers to any person under 18 years of age.

Principles

The SGC recognises that:

- The welfare of young people is the primary concern.
- All young people whatever their age, culture, disability, gender, language, racial origin, religious belief, and/or sexual identity have the right to protection from abuse.
- It is the responsibility of child protection experts to determine whether abuse has taken place, but it is everyone's responsibility to report any concerns.
- All incidents of suspicious poor practice and allegations should be taken seriously and responded to swiftly and appropriately.

Summary of Partnership Responsibilities

The SGC:

- Accepts the moral and legal responsibility to implement procedures to provide a duty of care for young people, safeguard their wellbeing and protect them from abuse.
- Respects and promotes the rights, wishes and feelings of young people and disabled adults.



- Recruits, trains, and supervises its employees and volunteers to adopt best practice to safeguard and protect young people from abuse and themselves against false allegations.
- Requires volunteers, staff, and members to adopt and abide by this document.
- Responds to allegations appropriately and implement the appropriate disciplinary and appeals procedures.

It is intended that all employees and volunteers working with children, young people and vulnerable adults will receive training to assist them in the recognition of abuse; the referral process; sensible working practices; and to identify 'appointed persons' within the BGA and at club level, whom staff can contact about child protection issues.

THE LEGAL FRAMEWORK AND GUIDANCE

Everyone that works with children must be aware of the laws that aim to protect children from harm.

Children and Young People (Scotland) Act 2014

Duty of Care is placed on all those who work with children and young people. For the purposes of this act a child is defined as an individual aged under 18 years. This has replaced The Children (Scotland) Act 1995.

The Protection of Children (Scotland) Act 2003 (PoCSA)

Organisations must comply with the requirements of PoCSA, in that:

- They will not allow anyone who is fully listed on the Disqualified from Working with Children List to work/volunteer in a childcare position within their organisation.
- They will make a referral (send a written report) to Scottish Ministers if an individual harms a child or puts a child at risk of harm and because of this, they take the decision to remove them or they leave of their own accord, come to the end of a contract, retire or have been made redundant.
- When making a referral it should be done in the appropriate manner by using the required Scottish Government Referral Form: www.scotland.gov.uk/Topics/People/Young-People/children-families/

GOOD PRACTICE GUIDELINES

This section is an extract from a document entitled: Child Protection Policy and Implementation procedures: Guidelines for Governing Bodies of Sport and Local Authorities. Whilst there are some guidelines that will not apply to the BGA or at club level, the principles described are helpful and should be applied. All personnel in sport should be encouraged to demonstrate exemplary behaviour and follow best practice to limit the possibility of allegations to protect themselves from allegations. The following are common sense examples of how to create a positive culture and climate within sport:

Good practice means:

- always working in an open environment (e.g. avoiding private or unobserved situations and encouraging an open environment (e.g. no secrets)
- treating all young people equally, and with respect and dignity
- always putting the welfare of each young person first, before winning or achieving goals
- maintaining a safe and appropriate distance with performers (e.g. it is not appropriate to have an intimate relationship with a child or to share a room with them)
- building balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- making sport fun, enjoyable and promoting fair play

- ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the NGB. Care is needed as it is difficult to maintain hand positions when the child is constantly moving. Young people should always be consulted, and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should always be carefully considered.
- keeping up to date with the technical skills, qualifications, and insurance in sport
- involving parents/carers wherever possible (e.g. for the responsibility of their own children in the changing rooms). If groups must be supervised in the changing rooms, always ensure parents/teachers/coaches/officials work in pairs.
- ensuring that if mixed teams are taken away, they should always be accompanied by a male and female member of staff. (NB However, same gender abuse can also occur.)
- ensuring that at tournaments or residentials, adults should not enter children's rooms or invite children into their rooms.
- being an excellent role model – this includes not smoking or drinking alcohol or swearing in the company of young people.
- giving enthusiastic and constructive feedback rather than negative criticism
- recognising the developmental needs and capacity of young people – avoiding excessive training or competition and not pushing them against their will
- securing parental consent in writing to acting in loco parentis if the need arises to give permission for the administration of emergency first aid and/or other medical treatment.
- awareness of any medicines being taken by participants, or existing injuries
- keeping a written record of any injury that occurs, along with the details of any treatment given.
- requesting written parental consent if club officials are required to transport young people in their cars.

CODE OF PRACTICE

SGC regards gliding as a positive activity for young people.

Through its Child Protection policy and procedures SGC encourages all participants in gliding to assist with safeguarding the welfare of all junior participants including, protecting them from physical, sexual, and emotional harm.

If you suspect abuse, a young person confides in you, or a complaint is made about any adult or about you - **it is your duty to report the concern.**

If a young person tells you about someone else:

1. Allow the young person to speak without interruption, accepting what is said
2. Offer immediate understanding and reassurance, while passing no judgement
3. Advise that you will try to offer support but that you must pass information on
4. Immediately tell the Club Child Protection Officer or Deputy;
5. Write careful notes of what was said, use actual words wherever possible
6. Sign, date, and pass your notes to the Child Protection Officer or Deputy;
 - SGC Child Protection Officer- Wendy Carmen
 - SGC Deputy Child Protection Officer – John Thomas
7. And ensure that no gliding situation arises that could cause further concern

If you have a concern about a young person's safety and well-being:

1. Immediately tell the Club's Child Protection Officer or Deputy; and
2. Write careful notes of what you have witnessed, heard, or were told; and
3. Sign, date and pass your notes to the Child Protection Officer or Deputy; and
4. Ensure that no gliding situation arises that could cause further concern.

If you receive a complaint or allegation about any adult or about you:

1. Immediately tell the Club's Child Protection Officer or Deputy; and
2. Write careful notes of what you have witnessed, heard, or were told; and
3. Sign, date and pass your notes to the Child Protection Officer or Deputy; and
4. Ensure that no gliding situation arises that could cause further concern.

Any adult in gliding has the right to report any concerns or suspicions in confidence and free from harassment. You must refer any concerns, and you must not investigate.

Non-emergency numbers include:

Police (non-emergency) – 101

NHS 24 – 111

Childline – 0800 1111

Crimestoppers Scotland – 0800 555 111

In an emergency where a young person is in imminent risk of significant harm, contact the police via 999 or the Child Protection and Duty Team Kinross (24 hours) on Tel: 01738 476768.

SAFEGUARDING EMPLOYEES AND VOLUNTEERS

EXPECTED CODE OF BEHAVIOUR

DO:

- Plan activities with young people so that more than one other person is present, or at least within sight and hearing of others (**note** this is not always possible when gliding or training on the Winch)
- Always try to have a witness as part of any one-to-one sensitive conversations
- Let someone know where you are and what you're doing if you can't avoid being on your own with a young person
- Always put this code into practice
- Treat everyone with dignity and respect
- Set an example you'd wish others to follow
- Treat all young people equally - show no favouritism
- Respect a young person's right to personal privacy
- Allow young people to talk about any concerns they may have
- Remember this code even at sensitive moments e.g. when responding to a young person's concerns
- Encourage others to challenge any attitudes or behaviours they do not like
- Avoid being drawn into inappropriate attention seeking behaviour e.g. tantrums or crushes
- Avoid unacceptable situations within a relationship of trust e.g. a sexual relationship with a junior member over the age of consent
- Have separate sleeping accommodation for young people and adults
- Avoid drinking alcohol when young people are in your care
- Remember that someone else might misinterpret your actions, no matter how well intentioned
- Make young people, parents, carers and club members aware of the Club's Child Protection Policy and procedures
- Take any allegations or concerns of abuse seriously and refer them immediately

DO NOT:

- Trivialise abuse
- Form a relationship with a young person that's an abuse of trust
- Permit abusive peer activities e.g. initiation ceremonies and bullying
- Engage in inappropriate behaviour or contact e.g. physical, verbal and sexual
- Play physical contact games with young people
- Make suggestive remarks or threats to a young person, even in fun
- Use inappropriate language e.g. verbal, in writing, telephoning, in emails or via the internet
- Let allegations, suspicions, or concerns about abuse go unreported
- Just rely on your good name to protect you

DATA HANDLING

As an organisation using the Disclosure Scotland (DS) checking service to help assess the suitability of applicants for positions of trust, SGC complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on.

Storage and Access

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

Handling

- In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. The Club maintains a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.
- Generally, certificate information will be reviewed using an online DS register and no certificates themselves will be held within the club. If a certificate is provided it will be inspected for the relevant information and once the inspection has taken place the certificate will be destroyed i.e. in accordance with the Usage, Retention and Disposal policy below.

Usage

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

Retention

- If a certificate is required in the process of recruitment once a recruitment (or other relevant) decision has been made, the Club will not keep certificate information for any longer than is necessary. This is generally for a period of up to 6 months, to allow for the consideration and resolution of any disputes or complaints.
- If, in exceptional circumstances, it is considered necessary to keep certificate information for longer than 6 months, the Club will consult the DS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so.
- Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Disposal

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

The Club will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, in relation to the contents of the certificate, the Club may keep a note of the following information:

- Type of certificate
- Certificate number
- Date of issue
- Name of applicant
- Position applied for
- Details of the recruitment decision taken

Club DS Certificate Requirements

The Club will require any employee or volunteer who holds a post where they will be working with children in an unsupervised manner to hold a valid Enhanced DS Certificate. These certificates will be reviewed on an annual basis and the club records updated.

The Club will only hold basic details of the DS certificate:

- Certificate Number
- Date of Issue
- Date of latest check

DS certificate information will be updated annually with the holder's permission. The club will not keep any photocopy or image of the certificate.

Form for Recording Allegations or Concerns About Children

Please use this form as a prompt, recording any additional information on the back or on another sheet of paper.

Your job is NOT to investigate any incident, but to record accurately all factual information you receive or signs and symptoms you observe. Child's details (name, age, address, telephone number etc.)	
Child's parents or guardian's details if known	
Details of person reporting the suspicion/allegation/ concern to you (this may be the child)	
Describe what the suspicion / allegation / concern is	
Describe fully any signs, symptoms you or others have observed (include here what the child has told you)	
Where did this occur (as far as you know)?	
When did this happen (as far as you know)?	
If some earlier signs/symptoms were noticed before today, when and where was this?	
Record details of anyone else who may have been present or have relevant information	
Record who has been informed (you must inform one of the Club Child Protection Officers as soon as possible without delay)	
Record the advice given by Children's Social Services or the Police	
Signed	Date
Job title	Telephone number

Send or hand the completed form to the SGC Child Protection Officer as soon as possible.

Handling Complaints and Allegations of Abuse

Any allegation or complaint about a SGC employee or member must be reported immediately to Club Child Protection Officer or Deputy as soon as possible.

In such cases, if the information is given in confidence, it must be explained to the reporting individual that the information must be shared.

Should SGC be made aware of an allegation or complaint, it must not start its own enquiries, but should follow the guidelines set out below, recording what is known in the Form for Recording Allegations or Concerns and passing the information on to relevant authority. Immediately report your concerns to:

Club Child Protection Officer Wendy Carmen Telephone: 07709 019602

Club Child Protection Deputy John Thomas Telephone: 07821749631

BGA Child Protection Leader Telephone: 07880 547176

BGA Office Telephone: 0116 289 2956

If unable to contact the above and there is an immediate danger, please call either the Police Child Protection Team or Children's Services.

The Child Protection Officer or Deputy will immediately report the matter to the Children's Services and consult on what information should be provided to parents. If sexual or physical abuse is suspected, advice will be given on whether the Police should be involved. Normally, parents or guardians will be informed as to what has happened unless such action would prejudice the investigation or place the child at greater risk.

Send your completed form to the Children's Services Child Protection Co-ordinator or Duty Social Worker involved as soon as possible and agree with them the best way to do this. Ensure that you keep a copy for yourself. Do not discuss the matter or show the form to anyone else unless you know that they are authorised to have access to the information. Make sure any written information providing personal details is sent in a sealed envelope marked Private and Confidential.

All referrals to Children's Services must be confirmed in writing within 24 hours and Child protection matters must not be investigated at Club level.

The employee, member or volunteer may need to be suspended from Club activities whilst the matter is being investigated. This decision will be made by the SGC Board or representative member, who will decide if it is appropriate for them to continue attending the Club pending outcome of any investigation, taking into account all of the relevant circumstances. If suspension is not deemed necessary, the employee, member or volunteer will not be allowed to have unsupervised access to children, whilst the investigation is in progress.

RECRUITMENT AND SELECTION

The following arrangements apply for all posts where a member, employee or volunteer will be working with children in an unsupervised manner.

Recruitment Information

When a post is to be advertised, the Club representative must make it clear that this post has unsupervised access to children to ensure that the proper checks are made.

Checks and References

The recruitment process must make clear that checks will be made on their suitability to work with children, which will include obtaining references from immediate prior employers, referees and completing an Enhanced Disclosure Scotland (DS) check. The reference request must make it clear that the person is applying for a job with unsupervised access to children and if there is any known reason why the person should not be employed in such a capacity.

Appointment of Ex-Offenders

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure Scotland Service (DS), the Club complies fully with the code of practice and undertakes to treat all applicants for positions fairly.

The Club undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

The Club can only ask an individual to provide details of convictions and cautions that it is legally entitled to know about. Where a DS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).

The Club may only ask an individual about convictions and cautions that are not protected.

The Club is committed to the fair treatment of its members, staff, potential staff, or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability, or offending background.

The Club will make this policy on the recruitment of ex-offenders, available to all DS applicants at the start of the process.

The Club actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications for membership or appointment to a specific role within the club, from a wide range of candidates, including those with criminal records.

The Club selects all candidates for an appointment based on their skills, qualifications, and experience.

An application for a criminal record check is only submitted to DS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DS certificate will be submitted in the event of the individual being offered a position.

The Club ensures that all those involved in the appointment process are suitably trained to identify and assess the relevance and circumstances of offences and that they have received appropriate guidance and training in the relevant legislation relating to the appointment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, the Club ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to

reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of appointment.

The Club makes every subject of a criminal record check submitted to DS aware of the existence of the code of practice and makes a copy available on request.

The Club undertakes to discuss any matter revealed on a DS certificate with the individual seeking a position before withdrawing a conditional offer of appointment.

Appointment of Child Protection Officer and Deputy

The Child Protection Officer and Deputy must have a satisfactory DS check carried out before they can be appointed to the position of the designated person responsible for DS checks and procedures.

INFORMATION FOR, AND ACCEPTANCE BY PARENTS CONCERNING YOUNG PEOPLE

SGC wants parents to be fully aware of the limited levels of supervision the Club can practically provide for their child, especially at times when the child is not involved in flying activities.

Although the Club doesn't want to put unnecessary restrictions in the way of any young person keen to participate in gliding, we consider it important that parents understand what they can and cannot expect the Club to do towards caring for their child whilst on the airfield and in and on our premises. To this end we ask you to consider the following and if you understand and agree with it, to complete and return a signed copy as indicated at the end of this statement.

Children Under the Age of 14 Years

Children under the age of 14 are only allowed on the airfield and premises if they are in the continual care and supervision of their parents or an adult nominated by the parents.

Children under the age of 14 can be given an Introductory/Trial Lesson. They must be heavy enough for the safe operation of the glider and they must be big enough to be strapped in safely and to see out of the glider. They would also need to be approximately 5 feet (1.5 metres) tall and weigh at least 98 lbs (45 kg). This often approximates to the person being approximately twelve years old.

During 'flying hours,' which are usually 8.30 a.m. to 6.00 p.m. the Club will agree to no parental presence, provided the Duty Instructor for the day agrees, the young person accepts they stay with the Club members present that day and the office has a contact phone number.

Young People Who Are 14 Years of Age and Older

The Club accepts flying members from the age of 14 years old upwards and accepts that young people in this age group will often not have parental supervision whilst at the Club.

What Parents Can Expect the Club to Do

The Club sees flight safety as its highest priority and will do all it can to ensure your child is safe whilst involved in flying activities both on the ground and in the air. This starts with a briefing that points out the immediate hazards and further briefings are given as an integral part of learning to fly a glider. Air and ground safety tuition is a continuous training process for all members.

Once the young person goes out to the launch point to fly, their flying and safe conduct on the ground is the concern of the instructors involved. The safety aspects of flying and ground operations are structured and are the responsibility of the Chief Flying Instructor and they devolve safety to the instructors.

Parents Need to Understand

Any young person joining the Club is joining an adult members club and all members of any age come and go when they please with no formality. For young people this means that, unlike going to school where teachers take on some parental responsibility for part of the day, or a Scout camp where Leaders do the same thing 24 hours a day, coming to the Club is different. Apart from the start of a pre-booked course, there is no one present at the Club to check that a young person has arrived or who accepts any degree of responsibility for them.

If any filming or photography takes place on the airfield it will be of an incidental nature, and you can ask us not to do this.

What the Club Cannot Do

The Club does not attempt to provide supervision for young people other than that associated with our flying activities. When any young person is not flying, they may return to the clubhouse, go home, or pursue other activities with friends, and the Club does not and cannot supervise this.

The Club treats all members equally regardless of their age, but the following rules and procedures do apply to those under 18:

1. Under 18's staying in Club overnight accommodation are given single rooms where possible and are not allowed to share double rooms with an un-related adult.
2. Under 16's cannot stay at the Club overnight unless accompanied by an adult.
3. No alcohol is served to anyone under 18 in the bar.
4. Anyone without a full UK driving licence is not allowed to drive any vehicle on the parts of the airfield that are accessible by the public ("non-airside"). This prohibits young people driving the Club's vehicles and our insurers have stipulated they are not insured to do so.

Sometimes young people want to stay at the Club overnight either in tents or caravans that they provide for themselves. The Club operates in daylight only and has no staff on duty at night. Although the airfield has gates and fences, unauthorised public access cannot be prevented. Parents must satisfy themselves that any overnight arrangements made for their children are sensible and safe.

Transport to and from the airfield - the Club has no access to nearby public transport and although some young people who live within a few miles do cycle to the Club, the majority rely on their parents for travel, which although ideal is not always possible. Your child may get to know a member at the Club and be offered a lift, which may or may not be acceptable to you. If this happens, it is important to note that arrangement will not be made with the agreement and consent of the Club, as the Club will not be aware of, or know about it.

Young people are welcome to be members and fly at the Club, however, it is difficult for the Club to make special arrangements for all of their individual needs.

If a young person has any concerns about his or her treatment at the Club, they should be advised to contact you immediately. A telephone is available 24 hours a day in the clubhouse and a young person with a problem should also report a problem to an instructor, a Committee Member, the Child Protection Officer or their deputy or any other responsible person.

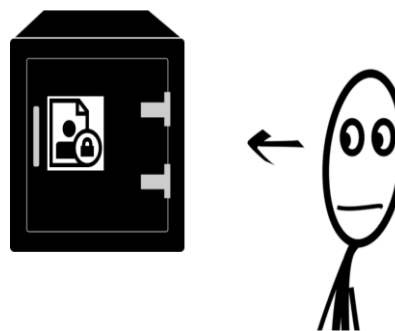
Parents and Responsible Individuals

As a parent, if you have any concerns or questions about any of the information above or related issues, they must contact the Child Protection Officer or their deputy.

Please note: The Child Protection Policy contained within the handbook is an abbreviated version of the policy and you can find the full policy contained within the Operations Manual.

Data Protection Policy

IMPORTANT: Our Data Protection Officer at the time of issuing this policy is **Andrew Wood, Club Secretary and Vice Chair**. Any questions about this policy should be addressed to him. If he is no longer the Data Protection Officer, you can find out who is by contacting a member of management.



OVERVIEW

We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. This policy sets out the things we must tell you about data protection.

We take the security and privacy of your data seriously and intend to comply with our legal obligations under the Data Protection Act 2018 (the '2018 Act') and the UK General Data Protection Regulation ('GDPR') in respect of data privacy and security.

This policy applies to current and former employees, workers, volunteers, apprentices, and consultants. If you fall into one of these categories, then you are a 'data subject' for the purposes of this policy. You should read this policy alongside your contract of employment (or contract for services) and any other notice we issue to you from time to time in relation to your data.

The Club is a '**data controller**' for the purposes of your personal data. This means that we decide how and why we process your personal data.

This policy explains how we will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing, or storing personal data in the course of volunteering for, or on behalf of, the Club.

This policy does not form part of your contract of employment (or contract for services if relevant) and we may update it at any time. It is intended that this policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this policy, the Club intends to comply with the 2018 Act and the GDPR.

DATA PROTECTION PRINCIPLES

Personal data must be processed in accordance with the following '**Data Protection Principles**'. It must:

- be processed fairly, lawfully, and transparently.
- be collected and processed only for specified, explicit and legitimate purposes.
- be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay.
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are responsible for ensuring and demonstrating compliance with these principles.

HOW WE DEFINE PERSONAL DATA

'**Personal data**' means information which relates to a living person who can be **identified** from that data (a '**data subject**') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of

the intentions of us or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data whether it is stored electronically, on paper or in/on other materials.

This personal data might be provided to us by you, or someone else (such as a former employer, your doctor, or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or after it has ended. It could be created by the board or other colleagues.

We will collect and use the following types of personal data about you:

- Recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments.
- Your contact details and date of birth.
- The contact details for your emergency contacts.
- Your gender.
- Your marital status and family details.
- Your bank details and information in relation to your tax status including your national insurance number.
- Your identification documents including passport and driving licence and information in relation to your immigration status and right to volunteer for us.
- Information relating to your performance and behaviour in any club environment.
- Training records.
- Electronic information in relation to your use of IT systems/swipe cards/telephone systems.
- Your images (whether captured on CCTV, by photograph or video).
- Any other category of personal data which we may notify you of from time to time.

HOW WE DEFINE SPECIAL CATEGORIES OF PERSONAL DATA

‘Special categories of personal data’ are types of personal data consisting of information about:

- your racial or ethnic origin.
- your political opinions.
- your religious or philosophical beliefs.
- your trade union membership.
- your genetic or biometric data.
- your health; and
- your sex life and sexual orientation.

We may hold and use any of these special categories of your personal data in accordance with the law.

We may also hold and use personal data relating to criminal allegations, offences, proceedings, and convictions.

HOW WE DEFINE PROCESSING

‘Processing’ means any operation which is performed on personal data such as:

- collection, recording, organisation, structuring or storing.
- adaption or alteration.
- retrieval, consultation, or use.
- disclosure by transmission, dissemination or otherwise making available.
- alignment or combination; and
- restriction, destruction, or erasure.



This includes processing personal data which forms part of a filing system and any automated processing.

HOW WILL WE PROCESS YOUR PERSONAL DATA?

We will process your personal data (including special categories of personal data) in line with our obligations under the 2018 Act.

We will use your personal data:

- for performing the employment contract (or contract for services) between us.
- for complying with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights below.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

If you choose not to give us with certain personal data, we may not be able to carry out certain parts of the contract between us. It might also prevent us from complying with certain legal obligations and duties, such as to make reasonable adjustments in relation to any disability you may have.

Examples of when we might process your personal data.

We have to process your personal data in various situations during your recruitment, employment (or engagement) and even following termination of your employment (or engagement).

For example:

- To decide whether to employ (or engage) you.
- To train you and review your performance*.
- To decide whether and how to manage your performance, absence, or conduct*.
- To determine whether we need to make reasonable adjustments to your role because of your disability*.
- To monitor diversity and equal opportunities*.
- To monitor and protect the security (including network security) of the Club, of you, members, and others.
- To monitor and protect the health and safety of you, customers and third parties*.
- To provide a reference upon request from a prospective employer.
- To monitor compliance by you, us and others with our policies and our contractual obligations*.
- To comply with employment law, immigration law, health and safety law, tax law and other laws which affect us*.
- To answer questions from insurers in respect of any insurance policies which relate to you. *
- To run our business and plan for the future.
- For the prevention and detection of fraud or other criminal offences.
- To defend the Club in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure*.
- For any other reason which we may notify you of from time to time.

We will only process special categories of your personal data (see * above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we ask for your consent to process a special category of personal data, then we will explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting a

board member.

We do not need your consent to process special categories of your personal data when we are processing it for the following purposes:

- Where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent.
- Where you have made the data public.
- Where processing is necessary for the establishment, exercise, or defence of legal claims; and
- Where processing is necessary for the purposes of health or for the assessment of your volunteering capacity.

We might process special categories of your personal data for the purposes in the above list which have an asterisk beside them. In particular, we will use information in relation to:

- your race, ethnic origin, religion, sexual orientation, or gender to monitor equal opportunities.

SHARING YOUR PERSONAL DATA

Sometimes we might share your personal data with the BGA to carry out our obligations for our legitimate interests.

We require the BGA to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

HOW SHOULD YOU PROCESS PERSONAL DATA FOR THE CLUB?

Everyone who volunteers for, or on behalf of, the Club has some responsibility for ensuring data is collected, stored, and handled appropriately, in line with this and other relevant policies.

The Club's Data Protection Officer is responsible for reviewing this policy and updating the Board of Directors on the Club's data protection responsibilities and any risks in relation to the processing of data. You should direct any questions in relation to this policy or data protection to this person.

You should only access personal data covered by this policy if you need it for the volunteering activities you do for, or on behalf of the Club and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.

You should not share personal data informally.

You should keep personal data secure and not share it with unauthorised people.

You should regularly review and update personal data which you have to deal with for volunteering. This includes telling us if your own contact details change.

You should not make unnecessary copies of personal data and should keep and dispose of any copies securely.

You should use strong passwords.

Personal data should be encrypted before being transferred electronically to authorised external contacts.

Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.

Personal data should never be transferred outside the European Economic Area except in compliance with the law and authorisation of the Data Protection Officer.

You should lock drawers and filing cabinets. Do not leave paper that contains personal data lying about.



You should not take personal data away from the Club's premises without authorisation from a board member or our Data Protection Officer.

Personal data should be shredded and disposed of securely when you have finished with it.

You should ask for help from our Data Protection Officer if you are unsure about data protection or if you notice any areas of data protection or security we can improve upon.

HOW TO DEAL WITH DATA BREACHES

If this policy is followed, we should not have any data breaches. But if a breach of personal data occurs (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals, then we must also notify the Information Commissioner's Office within 72 hours where feasible.

If you are aware of a data breach, you must contact the Data Protection Officer immediately and keep any evidence you have in relation to the breach.

SUBJECT ACCESS REQUESTS

Data subjects can make a '**subject access request**' ('SAR') to find out what information we hold about them. This request must be made in writing. If you receive an SAR, you should forward it immediately to the Data Protection Officer who will coordinate a response.

To make a SAR in relation to your own personal data, you should write to the Data Protection Officer. We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by up to two months.

There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive, we may charge a reasonable administrative fee or refuse to respond to your request. The administrative fee would be based on the amount of a visitor's daily charge as per tariff. We normally charge on the basis of any request which will take more than a day to deal with is likely to be manifestly excessive, and in those circumstances, we believe a reasonable charge is the equivalent of a visitor day membership as per our tariff for you.

YOUR DATA SUBJECT RIGHTS

- You have the right to information about what personal data we process, how and on what basis as set out in this policy.
- You have the right to access your own personal data by way of a subject access request (see above).
- You can correct any inaccuracies in your personal data by contacting the Data Protection Officer.
- You have the right to request that we erase your personal data where we were not entitled under law to process it, or it is no longer necessary to process the data for the purpose for which it was collected. You can request erasure by contacting the Data Protection Officer.
- During the process of requesting that your personal data is corrected or erased or while you are contesting the lawfulness of our processing, you can ask for the data to be used in a restricted way only. To do this, contact the Data Protection Officer.
- You have the right to object to data processing where we are relying on a legitimate interest to do so, and you think that your rights and interests outweigh our own and you wish us to stop.
- You have the right to object if we process your personal data for the purposes of direct marketing.
- You have the right to receive a copy of your personal data and, with some exceptions, to



transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.

- With some exceptions, you have the right not to be subjected to automated decision-making.
- You have the right to be notified of a data security breach concerning your personal data where that breach is likely to result in a high risk of adversely affecting your rights and freedoms.
- In most situations we will not rely on your consent as a lawful ground to process your data. If we do request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the Data Protection Officer.
- You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.



Drugs and Alcohol Policy

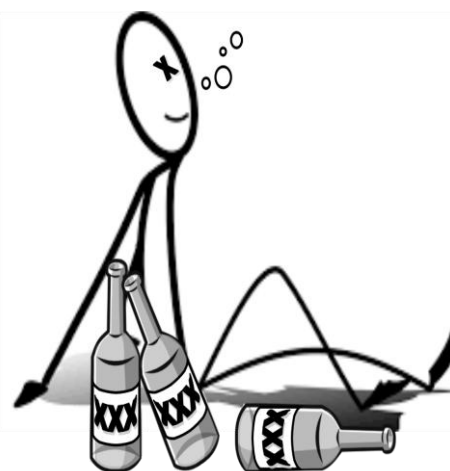
OVERVIEW

This is our policy about the use and misuse of drugs and alcohol whilst volunteering for or representing us.

This policy also applies to self-employed contractors, volunteers, workers, and agency workers.

We have a legal duty to protect the health and safety of anyone who volunteers with us and any external individuals who come into contact with us. It is very important that those volunteering for us can carry out their duties safely and free from the influence of drugs or alcohol.

The use and misuse of drugs or alcohol can also have a detrimental effect on the Club.



USING DRUGS OR ALCOHOL

We expect you to be able to carry out your duties fully and safely under your contract when you are volunteering for or representing us.

It is critically important that you do not drive or operate machinery if your performance of judgement might be impaired through the use or misuse of drugs or alcohol. This includes any drugs prescribed for you.

If you think that you may have a drug or alcohol problem or addiction, we encourage you to seek medical help. If you raise this with us, we will do our best to put you in touch with people and organisations specialising in drug and alcohol issues, and we will support as much, and as confidentially as we can in your recovery process.

If your performance is impaired, or your behaviour or attendance is negatively affected because of drugs or alcohol, and you have not first raised this with us with a view to seeking help, or our reputation is damaged as a result, then we may terminate the volunteering agreement.

If you know or suspect that a colleague is or has been misusing drugs or alcohol, you should raise this in confidence with a Club Board member. It's important that we find out about any issues so that we can help as best we can. We will also want to make sure we're meeting our health and safety responsibilities and protecting our business.

DRUGS

When we talk about 'drugs' under this policy, we mean illegal drugs, psychoactive substances ('legal highs'), and prescription or non-prescription drugs which may affect your ability to carry out your duties fully and safely.

You must not be in possession of illegal drugs or psychoactive substances (except for legitimate substances including food, tobacco, nicotine, caffeine, and medical products) at any time while volunteering for or representing us.

If you need medication for a genuine medical condition while volunteering, you should only bring in enough for your own use. It should be kept safely, in accordance with instructions and out of the view of other people. If your medication needs to be stored in a fridge, you must use a clearly labelled, sealed container.

Medication can have side-effects that affect performance. If this applies to you, please raise it with your Club Board member, so that we can take medical advice if necessary and consider any reasonable

adjustments that we might need to make.

It is your responsibility to seek advice from a doctor or pharmacist about the possible effects of your medication on your fitness to perform your volunteering activities.

We want to protect your health and safety, as well as that of other club members and our customers or clients, so if you have any drug-related impairment, you must tell us straightaway.

ALCOHOL

You must not be, nor must your appearance suggest you are under the influence of alcohol while you are volunteering for or otherwise representing us. This applies equally to a situation where you may have drunk alcohol before coming to the Club, or the day before, if you are still affected by it.

If a customer, supplier or other third party gives, or offers to give you alcohol as a gift, you should refer to our Bribery Policy (a gift is not itself bribery, but you should check the policy to satisfy yourself that accepting the gift does not breach the policy).

SCREENING

If we suspect that you are under the influence of drugs or alcohol and/or if your role is critical to health and safety, we may ask you to be screened for drugs or alcohol by an external provider. If you refuse, that could lead to termination of your volunteer agreement.

Equal Opportunities

OVERVIEW

This policy covers all aspects of how you are treated by the Club and everybody we employ (or engage). It covers (but isn't limited) to:

- Recruitment.
- training
- giving references.
- how visitors are treated.
- how members and suppliers are treated; and
- how any other business contacts and associates are treated.



This policy applies to all employees, apprentices, consultants, officers, contractors, interns, volunteers, job applicants, agency, and casual workers.

If you are an employee, this policy does not form part of your contract of employment, and we may amend it at any time.

You should read this policy in conjunction with our other policies including Harassment and Bullying Policy, Recruitment, and our Grievance Policy.

OUR EQUAL OPPORTUNITIES COMMITMENT AND AIMS

We will not tolerate discrimination or harassment and are committed to promoting equal opportunities in employment. Those who work for us, and anyone applying for a job with us, will receive fair and equal treatment.

We ensure, where possible, full access to everyone applying for a vacancy. Decisions concerning transfers and internal promotions are made so far as possible using only objective criteria.

We will never victimise anyone who makes a legitimate complaint to us about harassment or discrimination, or who supports a colleague in their complaint.

HOW THE LAW DEFINES DISCRIMINATION

The following list gives you a general description of the types of acts that may both breach this policy and be unlawful. Sometimes actions can be intentional, and sometimes unintentional. We include examples of both types in this list:

Direct discrimination: this is when somebody is treated less favourably because of a protected characteristic than somebody else has been, or would have been, in identical circumstances.

Example: rejecting a job applicant because of their race or refusing to promote someone because they are pregnant.

Indirect discrimination: this is when a group of people with one of the protected characteristics (subject to a couple of exceptions) is put at a disadvantage by a provision, criterion or practice applied to all volunteers unless the treatment is justified for a good business reason.

Examples: refusing a request to volunteer part-time without a good business reason (which indirectly discriminates against women, who are more likely to have childcare responsibilities); insisting all members volunteer on Saturdays without a good business reason (which indirectly discriminates against Jewish members, who may not be able to volunteer on the Jewish Sabbath).

Associative discrimination: this is where somebody is treated less favourably because of the personal characteristics of somebody else.

Example: treating a member less favourably because their parents are Jehovah's Witnesses.

Perceived discrimination: this occurs where someone is treated less favourable because someone wrongly believes they have a particular protected characteristic.

Example: treating a member less favourably because someone thinks he is gay, when in fact he isn't gay.

Harassment: this is when a hostile, humiliating, degrading, intimidating or similarly offensive environment is created in relation to a protected characteristic. We also consider it harassment for a worker to be subjected to uninvited conduct related to a protected characteristic that — as an intended or unintended consequence — violates their dignity.

Examples: name calling, lewd comments, excluding colleagues, making insensitive jokes, and displaying pornographic material are all examples of harassment. We deal in detail with harassment under our separate policy on harassment and bullying.

Victimisation: in a legal context, victimisation' has a much more restricted meaning than in real life. It occurs when a worker has complained about harassment or discrimination, or has supported a colleague in their complaint, and is then treated less favourably as a result.

Examples: a member who is 'sent to Coventry' because they spoke up on behalf of one of their colleagues in a harassment investigation, or a member who is dismissed under a pretext because they have complained of discrimination.

The 'protected characteristics' are:

- age.
- race (which includes colour and ethnic/national origin).
- disability.
- religion or belief.
- sex.
- gender reassignment.
- pregnancy or maternity.
- sexual orientation; and
- marital or civil partnership status

There are other actions which can be unlawful under equal opportunity legislation. Examples include:

- failure to make reasonable adjustments to minimise certain disadvantages suffered by a disabled member (or membership applicant).
- instructing another person (or applying pressure on them) to discriminate.
- knowingly assisting somebody else when they carry out a discriminatory act.
- discriminating against somebody believed to have a protected characteristic, whether they do, or because they associate with a third party who does.

HOW WE CARRY OUT OUR RESPONSIBILITIES AND DUTIES

Management and the wider members are essential for ensuring the success of this policy. We all have a legal responsibility to comply with it, and any of us — however senior or junior, may be personally liable for unlawful discrimination if we breach its terms.

Overall responsibility for the effective implementation and operation of the policy lies with management. Everyone volunteering at managerial level is expected to act in full accordance with this policy, led by example, and attain and maintain appropriate standards of behaviour within the teams they manage.

The ethos and standards covered by this policy can only be achieved and maintained if everyone in our Club cooperates fully. It is important to understand that you have a legal responsibility to comply.

If you breach this policy, you may also make the Club liable for your actions and we may both have to pay compensation to anyone who claims against us. We expect you to take personal responsibility for adhering to this policy's aims and commitments and for drawing any actual or potential breaches to our attention.

We also encourage everyone who works for us to help promote equal opportunities within the Club. Please contact a board member if you have any ideas about how we could do this better, or you would like to be more involved in achieving this policy's aims.

HOW WE RECRUIT, PROMOTE, AND MAKE OTHER SELECTIONS

We carry out all recruitment, promotion, and other types of selection procedures, such as redundancy selection processes, based on merit, using non-discriminatory and as far as possible, objective criteria.

Advertisements for vacancies must not include wording that may discourage some groups of people from applying, or stereotype in any way, and they must be placed where they can reach as wide and diverse a pool of potential candidates as possible.

Nobody applying for a job with the Club may be asked about their health, attendance record, or whether they have a disability before a job offer is made - except in very limited situations. It may, for example, be justifiable to ask whether the applicant needs any disability-related measures put in place for the interview, or to check that they can carry out a key part of the job. It is acceptable to make some job offers dependent on a medical examination.

It is unlawful to ask job applicants anything that might suggest an intention to discriminate on the grounds of a protected characteristic. Asking an applicant about their religion when they are applying for a job that involves weekend volunteering would not, for example, be allowed.

Nor would asking an applicant whether they have childcare responsibilities be allowed, as that suggests you might be intending to indirectly discriminate on grounds of sex or marital status.

It is fine to include certain health or disability questions in equal opportunities monitoring exercises, but the data gathered must not be used for selecting someone for a role, or in making other employment-related decisions.

HOW WE ENFORCE THIS POLICY AND HANDLE BREACHES

We will investigate any complaint or allegation you raise regarding a potential breach of this policy. If you believe you have been harassed or discriminated against you should contact a board member as soon as possible. If you want to take formal action, you will need to follow our grievance procedure (see our Grievance Policy) and read our policy on Harassment and Bullying.

Occasionally, people make complaints knowing they're not true. They might do this to avoid or deflect disciplinary action. We view any complaint made in bad faith as an act of misconduct and this will normally lead to disciplinary action. In some cases, bad faith complaints may lead to summary dismissal for gross misconduct.

HOW WE MONITOR WHETHER THE POLICY IS WORKING

We may record and analyse information about equal opportunities within the Club, and when you join the Club, you give us consent to gather and process this data about you. We use the information to make sure this policy is working properly and to refine it where that's needed. We also use the information to review the composition of our Club, and to promote Club equality.



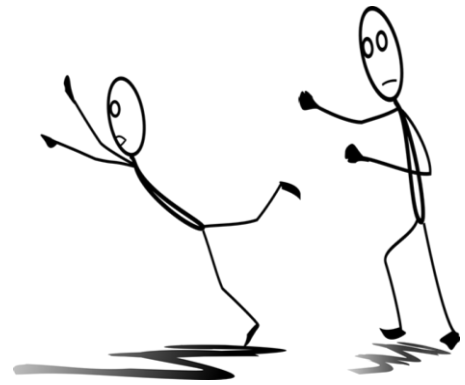
Harassment and Bullying Policy

OVERVIEW

We are committed to providing an environment where everyone is treated with dignity and respect and bullying and harassment is not tolerated.

This policy:

- a Explains the concepts of 'bullying' and 'harassment'
- b Sets out our expected standards of behaviour
- c Sets out the process you should follow if you have a bullying or harassment complaint
- d Explains how we will deal with any complaints



The policy applies to everyone who works for us, including employees, workers, agency workers, consultants, casual workers, volunteers and interns.

WHAT IS 'BULLYING'?

Bullying is unwanted behaviour from a person or group that is one of the following:

- Offensive, intimidating, malicious or insulting
- An abuse or misuse of power that undermines, humiliates or causes physical or emotional harm

Bullying can take many different forms. Examples of bullying behaviour include:

- Spreading malicious rumours about someone
- Consistently putting someone down and undermining them
- Deliberately giving someone a heavier workload than everyone else
- Excluding someone from team social events

Bullying could involve a pattern of behaviour or a one-off incident. It could happen face-to-face, online, by phone or in writing. It can be verbal and non-verbal. It is not always obvious to others.

Although bullying is often connected to a power imbalance, that does not mean that it always involves a more senior person bullying a more junior person. It can also be directed at someone more senior than the bully. It may take the form of spreading rumours, refusing to follow instructions, undermining authority, making fun of or mocking the more senior person or spreading rumours about them.

Constructive and fair feedback about your behaviour or performance from a Board member or other members is not bullying. It is part of normal part of Club and management functions.

WHAT IS 'HARASSMENT'?

When bullying or unwanted behaviour is related to certain protected characteristics under discrimination law, then we refer to it as 'harassment'. The protected characteristics which apply are:

- Sex
- Sexual orientation
- Race
- Religion or belief

- Gender reassignment
- Age
- Disability

Discrimination law also recognises sexual harassment as when someone is subjected to unwanted conduct of a sexual nature. It can also occur when a person is treated less favourably because they have accepted or rejected unwanted conduct of a sexual nature.

Harassment in each of the above forms is unlawful.

It is also unlawful to treat someone badly because they have made a complaint of harassment in any form or have helped someone else make a harassment complaint. This is called 'victimisation' and is not tolerated in our business.

Behaviour can still be harassment even if the person being harassed does not complain or ask for it to stop.

We define harassment as behaviour that creates a hostile, humiliating, degrading or similarly offensive environment in relation to a protected characteristic. Name-calling, lewd comments, excluding colleagues, making insensitive jokes and displaying pornographic material are all examples of harassment.

Even if you did not intend to harass someone, if your behaviour has this effect on someone else, then you may be found to have harassed them. They may only be a bystander to behaviour you directed at someone else, but they may still have been harassed.

The law protects people who are harassed because they are thought to have a certain protected characteristic when they do not, or they are linked to someone who has a certain protected characteristic even if they don't have it themselves.

THIRD-PARTY HARASSMENT

We want to create a Club atmosphere which is free of harassment. This objective extends beyond acts of harassment by those volunteering for us to harassment by third parties such as customers, visitors, clients & suppliers.

The law requires employers to take reasonable steps to prevent sexual harassment by third parties. We are committed to doing this.

You are encouraged to report any third-party harassment you are a victim of, or witness, in accordance with this policy.

We will take active steps to prevent third-party harassment of staff. Action may include the use of warning notices to customers, clients, visitors and suppliers stating that this behaviour will not be tolerated. We may also use recorded messages at the beginning of telephone calls stating the same.

We will assess the risk of third-party harassment in the Club environment and undertake to keep our risk assessment under regular review. We encourage you to come forward with any areas in which you believe our third-party harassment protection could be improved. Please let a Club Board member know.

If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other branches of the business.

OUR POSITION

We will not tolerate bullying, harassment or victimisation by anyone volunteering for us.

We expect you to treat people with respect and dignity in all communications you have with them, whether face-to-face, over the phone or in writing.

We will assess the risk of harassment in the Club and keep our risk assessment under regular review and we encourage you to come forward with any areas in which you believe harassment protection could be improved. Please let you're a Club Board member know.

You are encouraged to report any harassment you are a victim of, or witness, in accordance with this policy.

As a business, we are guided by our core values. These values impact the way we view membership behaviours and our expectations of you. We will provide regular training to everyone on what our values mean and explain how you must 'live' these values in your interactions with others.

We have clear and universal standards of Club conduct:

- Bad and/or offensive language or gestures of any nature should not be used in the Club, whether directed at a particular person or not.
- You should not treat a Club member differently because they have raised a complaint of harassment, or you think they might do so, or if they have supported someone else's complaint.
- Inappropriate images or other content should not be viewed or shared at the Club.
- You should always think before making a joke in the Club – could anyone be upset or offended by what you say?
- You should never invade Club members' personal space.
- You should not exclude Club members' unfairly from discussions or events.
- You should not use crude humour.
- You should not use an aggressive tone or aggressive language when speaking with Club members.
- You should not be physically aggressive towards Club members.
- You should not make sexually suggestive comments
- You should not mock, mimic or belittle colleagues in relation to any protected characteristic or otherwise
- You should not gossip about your Club members'.

Our standards of Club conduct and zero tolerance of harassment in the Club apply equally:

- at the Club; or
- during any situation related to volunteering activities such as at a social event with Club members'; or
- against a Club members' or other person connected to the Club outside of a volunteering situation, including on social media; or
- against anyone outside of a Club situation where the incident is relevant to your suitability to carry out your activities.

RAISING A COMPLAINT

If you believe that you are being bullied or harassed, then you should first consider whether it would be appropriate to discuss the matter informally with the person who is bullying or harassing you.



Sometimes, people do not realise how their actions are impacting others, and it might be that an informal discussion can resolve the issue and reset behaviours.

If you do not feel comfortable approaching the person yourself, or a direct approach has not worked, then you should refer to our Grievance Policy which sets out a clear process for raising complaints (both informally with an appropriate board member, and formally, if you prefer).

We may, if we think it necessary, separate you from the person you are complaining about whilst we investigate. This is not a prejudgment of your complaint. It is simply a way to stop things from getting worse during the investigation.

If you notice behaviour of others which may be in breach of this policy, then you should first consider whether it is appropriate to challenge the behaviour yourself. Only do so if you feel comfortable. If you don't feel comfortable, or a direct approach has not worked, then please report the matter to a board member, who will investigate.

If we decide that your complaint is not upheld, we will always tell you why in accordance with our Grievance Policy. Regardless of the formal outcome, if your complaint related to a colleague, we would consider ways of improving your relationship with your colleague[s] and may, for example, suggest mediation or offer training.

Anyone who raises an allegation of bullying or harassment with us in good faith will not be subjected to any detriment as a result.

We will monitor the treatment and outcomes of any complaints of harassment or victimisation we receive to make sure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified, and membership training is targeted where needed.

CONFIDENTIALITY

To protect the interests of the person complained about, the person who has raised the complaint and any others who may be involved as witnesses or otherwise, confidentiality will be maintained during any investigation process as far as is possible.

If you fail to maintain confidentiality when you are involved in some way in a bullying and harassment complaint, then you may face action under our Disciplinary Policy.

We may place information and documents about a complaint raised by or about you on your personnel file. These will be processed in accordance with our Data Protection Policy.

BREACHES OF THIS POLICY

Any breaches of this policy will be handled under our Disciplinary Policy and may result in action including dismissal for gross misconduct or the termination of your contract with us.

Aggravating factors such as abuse of power over a more junior colleague will be taken into account in deciding what disciplinary action to take.

Health, Safety & Wellbeing Policies

Health and Safety Policy

At Scottish Gliding Centre, we are committed to ensuring the health and safety of our employees, our volunteers, members, neighbours, and anyone affected by our business activities. We are committed to maintaining safe, healthy & hygienic volunteering conditions by controlling the health and safety risks arising from our volunteering; by providing appropriate information, training, and supervision for our volunteers; and by taking steps to prevent accidents and eliminate causes of volunteering-related ill health.

This policy applies to those volunteering at all levels.

We are responsible for:

- assessing risks to health and safety and identify ways to mitigate them.
- providing and maintaining a healthy and safe place to volunteer and a safe means of entering and leaving our premises, including emergency procedures when needed.
- providing information, instruction, training and supervision in safe volunteering methods and procedures as well as volunteer areas and equipment that are safe and without risks to health.
- ensuring that our volunteer tools are equipped with all necessary safety devices, that equipment is properly maintained, and that appropriate protective clothing is provided and worn.
- promoting co-operation, discussion, and effective consultation between volunteers to ensuring that safe and healthy conditions and systems are maintained and improved.
- regularly monitoring and reviewing the management of health and safety at the Club, making necessary improvements, and bringing such upgrades to the attention of all members.



WHO IS RESPONSIBLE?

The Chairman of the Board has ultimate responsibility for health and safety and for the execution of this policy. The Club has nominated a Principal Health and Safety Officer, who will have day-to-day responsibility for health and safety matters including:

- Ensuring that everyone is aware of their individual health and safety responsibilities.
- Initiating and recommending any changes, developments, and amendments to the policy.
- Informing the Health & Safety Executive of all notifiable accidents; investigating any accidents or dangerous occurrences and recommending means of preventing re-occurrence.
- Arranging appropriate training for all volunteers.
- Ensuring that Risk Assessments are carried out as needed.
- Ensuring follow up action as needed.
- Promoting responsible attitudes toward Health and Safety issues throughout the Club and its membership.

Each member has a duty to care for their own health and safety and for those of other people who may be affected by their acts or omissions when volunteering. It is the duty of each member to follow the Club's health and safety procedures, to promote compliance with general health and safety practices, and to report health and safety concerns to the Health & Safety Advisor.

SAFE USE OF EQUIPMENT

All volunteers must use equipment in accordance with operating instructions, instructions given by supervisors and any relevant training. Any fault with damage to or concern about any equipment or its use must immediately be reported to a board member.

Volunteers must ensure that health and safety equipment is not interfered with and that any damage is immediately reported.

WHAT HAPPENS IF I HAVE AN INCIDENT OR ACCIDENT AT THE CLUB; WHERE CAN I FIND FIRST AID?

Any incident, accident or 'near miss' at the Club should be recorded in the Incident Book and then reported to a board member. All volunteers must cooperate with any resulting investigation. There is a First Aid box situated in:

Corridor opposite Office window, Kitchen, Launch Caravan, East workshop, West workshop, winch workshop, Winch and Tug Hangar.

There are also Eye wash kits in the tug hangar and the winch workshop.

If you suffer an incident or accident or 'near miss' at the Club, you must report that fact to a board member and subsequently to the Health & Safety Advisor. All incidents/accidents should be reported, however trivial. The accident must be recorded in our Accident Book, which is kept alongside the First Aid Box.

NATIONAL HEALTH ALERTS

In the event of an epidemic or pandemic alert we will organise our operations and provide advice on steps to be taken by members to reduce the risk of infection at the Club as far as possible. Please refer to our separate policies within this section on Controlling the Risk of Infectious Diseases and Pandemic Recovery.

It is important for the health and safety of all our members and volunteers that you comply with the instructions issued in these circumstances.

EMERGENCY EVACUATION AND FIRE PRECAUTIONS

You should familiarise yourself with the instructions about what to do in the event of a fire. You should know where the nearest fire extinguishers and fire exits are. Also, you should know about alternative ways to leave the building during an emergency.

The Fire Warden is responsible for the effective evacuation of designated areas. In the event of a suspected fire or fire alarm you must follow their instructions.

Regular fire drills will be held to ensure that our fire procedures are effective and to ensure you are familiar with them. These drills are important and must be taken seriously.

You should notify a board member if there is anything (for example, impaired mobility) that might impede your evacuation in the event of a fire. A personal evacuation plan will be drawn up and brought to the attention of the person responsible for overseeing your evacuation.

If you discover a fire, you should not attempt to put it out unless you have been trained to do so. You should operate the nearest fire alarm and, if you have time, call the emergency services, and report the location of the fire.

Upon hearing the fire alarm, remain calm, walk quickly, do not run, and immediately evacuate the building, following instructions from the Fire Warden. Do not stop to collect personal items, do not use the lifts, and do not re-enter the building until you are told that it is safe to do so.

BGA Health and Safety

OVERVIEW

The Health & Safety Executive website notes how health and safety laws should not be a barrier to organising and running amateur sports activities that are an important part of community life.



HEALTH AND SAFETY AT WORK

The Health and Safety at Work (HSW) Act 1974 ('the Act') and the regulations made under it, apply to club organisers. The law requires them to do what is reasonably practicable to ensure people's health and safety. The Act is the definitive requirement and supersedes any guidance published here.

The Act sets out the general duties that employers have towards their employees whilst at work. The Act also requires employers and the self-employed to protect people other than those at work e.g. volunteer staff like coaches, club members, visiting teams and spectators. These people should be protected from risks to their health and safety arising out of, or in connection with, their club's work activities.

INTRODUCTION TO BGA

The British Gliding Association (BGA) consists of a central organisation and gliding clubs. This Safety Policy combines and documents BGA policy on the safety of gliding operations. It does not provide a means of compliance with occupational health and safety or environmental legislation.

As a non-complex, non-commercial air sport activity, gliding within the BGA and its member clubs is regulated by the UK Air Navigation Order and applicable EASA regulations, and managed in accordance with the BGA's own operational regulations and guidance material. The overall responsibility for the BGA organisations policy guidelines in respect of the BGA Safety Management System rests with the BGA Executive Committee.

SAFETY POLICY AND OBJECTIVES

The British Gliding Association, which includes all member clubs, is committed to safe practices with the objective of facilitating a sport gliding environment where the levels of risk are as low as reasonably practicable. This will be achieved through the implementation of an effective Safety Management System and a process of continuous improvement. The Accountable Manager has the responsibility to provide adequate resources to ensure that the BGA organisation can support and assist clubs and members to comply with all applicable legislation and procedural requirements to satisfy this policy.

The procedures necessary to achieve these aims are fundamental to this policy and apply to members, staff, and contractors. The BGA gives priority to not harming any third parties, to continuing to reduce the fatal accident rate, and to avoiding any airspace infringements. The British Gliding Association has an open reporting culture that encourages free and frank reporting within a just culture. 'Safety is everyone's responsibility.'

THE HSW ACT AND SAFETY WHEN FLYING

Health and safety law does not cover safety matters arising out of the sport or activity itself, i.e. flying gliders. Please note that a duty of care under the common (civil) law may apply.

Gliding participants are subject to statutory (ANO and EASA) rules and non-statutory (BGA) rules and guidance, which include topics like supervision, training, emergency procedures, accident investigation, and safety education. Some of these rules and guidance may go beyond the requirements of health and safety legislation.

HOW TO MANAGE THE HEALTH AND SAFETY RISKS

Understanding and controlling the risks through precautions that everyone is aware of and complies with are key to success. Assessing the risks is a significant element of managing the risks.

Assessing Risks

You don't need to be a Health and Safety expert to assess risks. Here are the HSE's 5 steps to risk assessment (with a single example risk topic in brackets);

1. Identify the hazards (e.g. falling/moving winch cables)
2. Decide who might be harmed and how (e.g. winch driver, tow car driver, people at launch point, pedestrians near the airfield)
3. Evaluate the risks and decide on precautions (e.g. club member training, winch location, and signage)
4. Record significant findings
5. Periodically review and update

It makes sense to document that specific risk assessment processes have been carried out. That documentation can be updated as required at the review step.

Children

It should be noted that children, i.e. those under 18, will have less awareness of risk than experienced adults. 'Reasonably practicable' in that case probably means that a different level of training may be required. Children under 16 should not drive or help to operate complex machinery (HSE re Agriculture – children and public safety*).

Training – and Recording Training

Training club members to be aware of ground hazards and how they are mitigated is reasonably straightforward. The most effective way to complete the training is 'on site' and particularly so when simple guidance is provided to the person delivering the training. A training record card can provide helpful prompts as well as record completion of the training.

Education and Awareness

There is a need to periodically update existing club members on Health and Safety risks and how they must be managed. That includes long standing and experienced members. Temporary members usually need close supervision as, despite any safety briefings that take place ahead of using club facilities, it is unreasonable to expect them to be as aware as experienced members.

* The winch, as part of the normal gliding training operation, can be driven by persons **above the age of 14 purely under training with an experienced designated winch trainer. Above the age of 15 fully trained and assessed persons can drive the winch under supervision by an adult.** For both these scenarios **written parental/guardian permission** must be obtained.

SAFETY MANAGEMENT SYSTEM – SCOPE

The BGA Safety Management System is designed to support safe operations by BGA clubs and members. Some risks potentially impact upon all members, visitors and other third parties, and need management by clubs and the BGA. These risks include those associated with airworthiness of aircraft, launching operations, and navigation to avoid controlled airspace. Gliding is first and foremost an air

sport activity. The appetite for risk from flying gliders varies among the sports participants. This aspect of risk is managed at three levels:

1. Third party visitors. Through training and risk-averse operational policies the risk is eliminated as far as is practicable.
2. Flights by unqualified** pilots who are therefore not equipped to effectively manage the risk for themselves. These risks include those associated with flight training and solo supervision.
3. Flights by qualified participants who can control the risk for themselves based on knowledge, the available information and experience.

**Qualified = holds either Bronze & Cross-Country Endorsement or a recognised Glider Pilot Licence.

SAFETY MANAGEMENT ACCOUNTABILITIES AND RESPONSIBILITIES

The responsibility for implementing the safety and quality systems is delegated to the Nominated Post Holders who ensure that an integrated approach to all operating standards is achieved and that all necessary regulatory and legal requirements are satisfied.

Nominated Post Holders

The Safety Management System Nominated Post Holders are;

Accountable Manager (Chief Executive Officer)

The Chief Executive Officer as Accountable Manager has overall accountability for the management of safety and compliance and is responsible for;

- The management organisation, ensuring that all BGA-led operations, training, and maintenance activity can be financed and carried out to a standard acceptable to the regulator
- Ensuring that the Safety Management System is effective in identifying hazards and risks and that they are mitigated and documented
- The promotion of safety and compliance within the BGA
- Acting as the Safety Manager
- The implementation and maintenance of the SMS

Nominated Post Holder –Club Chairman (supported as applicable by Club Officials including the Chief Flying Instructor and Club Safety Officer)

Clubs have responsibility through their club officials for the effective safe management of operations at their club sites. This includes ensuring that hazards and risk relating to their club sites are identified, reasonably mitigated & documented.

Nominated Post Holder -Airworthiness (Chief Technical Officer)

The Chief Technical Officer has responsibility for the effective safe management of BGA facilitated airworthiness activity.

Nominated Post Holder -Flight Training (Training Standards Manager)

The Training Standards Manager has responsibility for the effective safe management of BGA facilitated flight training activity.

Nominated Post Holder Review

Training and Airworthiness nominated post holders shall ensure that documented reviews of safety management applicable to their areas of responsibility are carried out as appropriate including as required under a formal approval. Club Chairmen should periodically ensure that a documented safety review is carried out at their club. See 'Club Safety Review' below.

HAZARD IDENTIFICATION AND RISK MANAGEMENT

Reporting

BGA guidance on both the UK minimum legal requirement and BGA requirement for reporting accidents and serious incidents is described in BGA Laws and Rules.

In the case of accidents on a gliding club site, the Club on the site (usually by delegation to the club CFI or Safety Officer) must ensure the necessary report has been submitted to the AAIB/BGA. In all other cases, the pilot in command involved in the accident must ensure reporting is undertaken.

Incident and accidents reported to the BGA are recorded on the BGA incidents and accidents database.

Club Internal Incident Reporting

Clubs should establish a club incident reporting system that proactively encourages reporting and includes a review and follow up process.

GUIDANCE ON INCIDENT REPORTING

All accidents and incidents involving gliders, self-launching gliders, microlight gliders, TMGs and tugs normally based at a BGA club or resulting from the flying operations of BGA gliding clubs, including those foreign registered, must be reported to the BGA. This includes accidents also reported to the AAIB, flying accidents resulting in minor injury and/or minor damage, and accidents unconnected with flight, for example encounters with moving winch cables, towed gliders hitting an object, glider damage from livestock or wind.

An INCIDENT is an unusual event which takes place in connection with the aviation activities of the club, but with no injury to persons and no damage to aircraft or property. All serious incidents and all incidents with safety implications beyond the originating club should be reported to the BGA.

All other incidents should be documented locally and managed by the club. As such, clubs are to establish a club incident reporting system that proactively encourages reporting.

Incident reporting to the BGA

Examples of incidents that should be reported to the BGA are indicated below:

	Examples
Preparation for flight	Rigging errors; glider incorrectly configured for flight
Technical	An aircraft component broke or did not operate correctly
Launch failures	Unusual failures; for instance glider on winch launch hits its own cable, frequent cable/launch equipment failures, tug upset
In flight	Inadvertent stall/spin, near collision with glider or tug, undershot airfield, uncontrolled or heavy landing, exceeded VNE, airbrake/undercarriage control confusion, lost above cloud, unusual weather/canopy misting, death from natural causes in a 2-seat glider
On ground	Winch cable dropping outside the airfield

Club Incident Reporting

Examples of incidents best handled by the club are indicated below:

Inadequate DI
Potential collision taking off or landing
Hazardous circuit or approach
Poor handling
Ground-loop without damage

SAFETY INVESTIGATIONS AND REMEDIAL ACTION

The purpose of an investigation of any accident or incident is to establish the facts and cause and thereby prevent further occurrence. The purpose is not to apportion blame or liability. The BGA publishes an accident investigation protocol.

The BGA will cooperate fully with Investigators from appropriate State Authorities when a formal AAIB investigation is being carried out. The BGA Principal Accident Investigator will be the primary point of contact with the State Investigators. AAIB normally delegate non-fatal accident investigation to the BGA.

The BGA has an Accident Investigation Team led by the Principal Accident Investigator, who reports to the Chairman of the BGA. The BGA Accident Investigation Team terms of reference are detailed in the BGA Terms of Reference publication.

Depending on the outcome of the reported incident or accident, a club level investigation will normally be arranged by either the relevant club Chief Flying Instructor or Safety Officer, or a BGA investigation will be arranged by a BGA investigator. In each case, the investigator shall determine as quickly as possible the facts of the incident in order to initiate any necessary changes to procedures, operating or engineering standards, modifications of equipment or other measures.

CLUB SAFETY REVIEW

Club safety reviews should be carried out periodically by clubs, ideally at least every three years. A copy of the report of the completed safety review should be sent to the BGA Office and maintained on file. Reports will be made available to the Safety Committee to assist in identifying trends.

HAZARD IDENTIFICATION AND RISK ASSESSMENT

Hazard analysis and risk assessment tools are important in providing a proactive approach to safety management. They will identify areas of relatively higher risk and will also aid the development of safe, effective, procedures and practices.

Hazard Identification

Effective identification of hazards (potential to cause harm) is achieved by;

- Review of accidents/incidents from internal/external sources
- Identifying deficiencies during reviews
- Identifying hazards that are possible but have never occurred
- Periodical review of hazards if there are changes
- Known hazards mitigated through published BGA operational requirements and guidance material

Hazard identification is regularly conducted to provide a comprehensive assessment of the risks faced by the operation. Measures are put in place through the SMS process to mitigate the risks. There are a small number of known significant hazards in gliding. Where an associated risk is shown to be greater than previously envisaged, mitigation action is taken.

RISK ASSESSMENT

Risk assessment is a subjective, qualitative method of evaluating and predicting the likelihood and severity of loss inherent in the identified hazard.

SAFETY ASSURANCE THROUGH GOOD PRACTICE AND COMPLIANCE MANAGEMENT

Safety assurance is established through good practice and compliance management. The BGA airworthiness and training activities are subject to compliance management processes that are independent from BGA airworthiness and training processes and post holders. Feedback from the airworthiness and training activities performance and findings are presented to the Accountable Manager at least annually. Wider safety assurance i.e. beyond airworthiness and training is met through the routine activity of the Safety and other Committees under their Terms of Reference.

EMERGENCY RESPONSE PLAN

An emergency response plan should be established by all BGA sites that describe the actions to be taken in the event of an emergency related to flying operations. This does not include emergencies not related to flying operations, for example those directly associated with buildings (Health & Safety, fire, etc) and road traffic (accidents) which are subject to other response requirements.

The emergency response plan should be accessible during flying operations and should describe;

- How the flying operation will transition from normal to emergency operations
- Who will take charge of the emergency
- How efforts to resolve the emergency will be co-ordinated
- How operations will continue or return to normal after the emergency
- How the emergency response plan will be co-ordinated with other organisations, for example the emergency services
- Frequency of review and who is responsible

COMMUNICATION OF SAFETY CONCERNS

Communication is vital in matters of safety. Procedures are in place to ensure that any significant safety concerns can be reported within the organisation for resolution (refer to reporting). It is essential that all significant safety concerns or suggestions are responded to by the safety organisation.

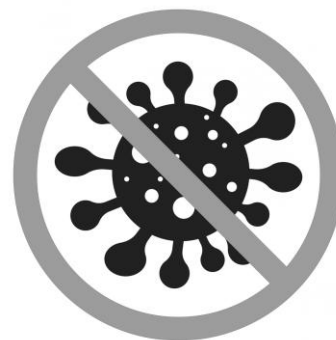
SAFETY EDUCATION COMMUNICATION

The BGA shall maintain and develop its safety communication such that it;

- Ensures that clubs are properly consulted and informed on safety related matters
- Ensures that all key post holders throughout the BGA are aware of BGA SMS
- Conveys safety-critical information, especially that related to assessed risks and hazards
- Explains why particular actions are taken
- Explains why changes are introduced

Regular dialogue regarding communication needs will take place between the Safety Committee and the BGA office.

Controlling the Risk of Infectious Diseases in the Club Policy



OVERVIEW

All volunteers may be at risk of infection, or of spreading infection, especially if their role brings them into contact with blood or bodily fluids like urine, faeces, vomit, or sputum. Such substances may contain micro-organisms such as bacteria and viruses which can be spread if volunteers do not take adequate precautions. Also, at risk of spreading infection are those involved in food preparation and handling. It is therefore important that strict hygiene precautions are observed.

Our rules on controlling the risks of infectious diseases must always be followed. However, there may be times when it is more important than ever that they are strictly followed, for example, during the outbreak of a disease such as the Coronavirus.

In order to restrict and reduce the risk of infection in the Club premises, the Club will:

- have systems in place that assess the risk of and prevent, detect, and control the risk of infection.
- designate a lead for infection prevention and control.
- ensure sufficient resources are available to secure effective prevention and control of infection.
- ensure volunteers, contractors and other persons who directly or indirectly provide work are provided with suitable information, instruction, training, and supervision in the precautions to follow.
- information is obtained from and shared with other businesses.
- audits are carried out to ensure policies and procedures are being implemented.
- a suitable and sufficient risk assessment is carried out with respect to prevention and control of infection.
- ensure an appropriate standard of cleanliness and hygiene is maintained throughout the premises and that the premises are maintained in good physical repair and condition.
- ensure appropriate standards of cleanliness and hygiene are maintained in relation to equipment.
- ensure that a suitable cleaning schedule is in place and followed.
- ensure there is suitable and sufficient hand washing facilities and antimicrobial hand rubs where appropriate.
- ensure the supply and provision of linen and laundry is appropriate.
- ensure suitable information on infections is provided to visitors, including the importance of hand washing by visitors.
- ensure information regarding infection is passed on to any other person, as necessary.
- ensure individuals who develop an infection are identified promptly and that they receive the appropriate treatment and care.
- inform the local health protection unit of any outbreaks or serious incidents relating to infection.
- ensure all volunteers co-operate with our control of infection procedures.
- provide regular suitable training, including induction training to all members on the prevention and control of infection.
- keep a record of all training and updates to members.
- ensure prevention and control of infection responsibilities are outlined in volunteers job descriptions.
- stagger start and finish times so that fewer people are together at once.
- cancel non-essential overseas travel to affected areas across the world.
- cancel non-essential training sessions.

- deal with clients/customers/members by phone and email.
- if face to face meetings must take place, ensure that facilities are suitable to minimise the spread of infection e.g., allowing a distance of more than one metre between participants.
- consider whether members may volunteer from home.

PROCEDURE

The Club will apply the following infection outbreak procedure to control the risk of infectious diseases in the Club:

- Strongly recommend that members follow any Government guidance published on self-isolation/quarantine.
- Encourage members to report symptoms of infectious diseases.
- Ensure members who have infectious disease symptoms do not come to the Club, and, in the case of diarrhoea and vomiting, they stay away for at least 48 hours after the symptoms have stopped.
- Where required, ensure notifiable outbreaks are reported to the relevant authority e.g., HSE.
- Co-operate with any investigation by a relevant authority and comply with any investigation findings.
- Keep the number of members dealing with affected persons to a minimum and do not allow these members to be involved with food handling.
- Prioritise cleaning, paying particular attention to the cleaning and disinfecting of toilets, handles, support handrails, taps and wash basins.
- Ensure members pay strict attention to infection control procedures, in particular to the washing of hands and the wearing of protective clothing if required.
- Provide and use antibacterial hand wash in all hand washing areas and in the rooms of outbreak.
- Inform visitors of the outbreak and discourage unnecessary visits.
- Receive external advice, if necessary.

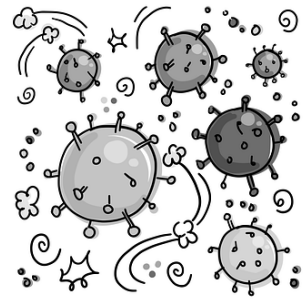
Pandemic Recovery Policy & Plan

OVERVIEW

As a result of the 2020 Covid-19 pandemic, the Club recognises the need to have a pandemic recovery plan and procedure.

The following procedure sets out the contingency measures that the Club will bring into effect in the event of a future pandemic.

The procedure aims to ensure that the Club will be able to operate its business to the best of its abilities in such an event while protecting, as far as is reasonably possible, its members.



PROCEDURE

The Board is responsible for ensuring that members understand the Club's pandemic recovery plan policy and procedure. Members are responsible for familiarising themselves with the procedure and should speak to the Board should they have any questions.

The Club will identify a Pandemic Crisis Management Team. The team will consist of member representatives from the Club and will include members of the Board and Committee.

In the event of a pandemic, members of the team will be expected to exercise leadership and make operational and business decisions, in the absence of senior and operational managers.

A pandemic communications strategy will be developed to ensure that members are provided with up-to-date and accurate information on the status of the pandemic. Information will be provided to members via the Club's Intranet, e-mail and, where possible, through team meetings. As well as other important information, members will be briefed on the symptoms of the virus and who to contact should they believe they, or a colleague, has the virus. Members will also be provided with instructions regarding personal hygiene to avoid spread of the virus.

The Club's leave and absence policies will be reviewed as the status of the pandemic changes. This includes the Club's policies on sickness absence, time off for dependants and bereavement leave.

Members may be required to observe several measures put in place by us to keep the risk of infection to an absolute minimum. Whilst advice will be published at the time in question to ensure it is specific to the pandemic, it is likely that rules will include:

- social distancing at the Club such as maintaining at least two metres distance between participants in essential meetings, avoiding unnecessary travel, cancellation of face-to-face meetings and volunteering from home.
- increased levels of hygiene management including keeping hands clean and coughing and sneezing into tissues which are immediately disposed of
- a requirement for members to adhere to Government guidance on management of symptoms and self-isolation where recommended.

The above policy and procedure will be continuously reviewed and updated to take account of the changing status of a pandemic.

Wellbeing Policy



OVERVIEW

We are committed to maintaining a Club environment in which the health, safety, and welfare of those volunteering for us is safeguarded.

This policy sets out our approach to identifying wellbeing issues, mitigating their effects, and supporting our people through difficult times, whether because of issues at home or at the Club.

This policy applies to employees, workers (including casual workers and agency workers), consultants / trainees / volunteers.

It may be updated from time to time. It should be read alongside our policies on Health and Safety, Equal Opportunities, Harassment and Bullying, Performance Improvement, Whistleblowing, and Recruitment.

MEANING OF 'WELLBEING'

Wellbeing is defined in the dictionary as 'the state of feeling healthy and happy'. It encompasses physical wellbeing and mental wellbeing.

OUR RESPONSIBILITIES

We comply with our statutory duties to protect those who volunteer for us. We will, for example, take all reasonable steps (sometimes with the benefit of risk assessments) to make sure that you:

- have a safe place and safe system for volunteering.
- can take appropriate breaks.
- are not put under excessive volunteering pressures.
- are not subjected to discrimination or harassment when volunteering.

We aim to identify, minimise the effects of, and wherever possible remove hazards that could harm your wellbeing.

We also take our wider responsibilities towards our membership seriously and do everything we can to ensure that you feel engaged, respected, and supported at the Club.

We promote a club-wide understanding of the importance of individual wellbeing, and of ways that each of us can take care of ourselves, as well as others.

We provide training in the management of mental health and other wellbeing issues to those responsible for applying this policy. Training helps them:

- understand the common types of mental ill health.
- spot the signs and symptoms of poor mental health.
- engage sensitively and supportively with team members.
- understand the support that can be offered and any physical and volunteering management adjustments that could be made.
- recognise when an member may need external support, and where that support could come from.

The Board has overall responsibility for our Wellbeing Policy and for its implementation.

We treat everyone who works and volunteers for us fairly and we do not discriminate against people because they might have mental health conditions. We aim to offer an environment in which stigma has no place and in which you can thrive.

STRESS

Any volunteering environment creates pressures. In most situations that pressure is not harmful; in fact, some people find it helps them do their job well. However, where pressure is excessive or is applied in particular ways it can lead to stress.

Stress is negative. Its effects include anxiety and depression, as well as physical health problems.

Symptoms of stress may include absenteeism, uncharacteristic errors, temper outbursts and lack of motivation.

Stress can be brought about not just by the pressure of having too many volunteering activities, or activities that are overly challenging. It could also be the result of a difficult relationship with a member, not understanding your role, or change within our Club. Pressures outside of the Club can cause or add to stress when volunteering.

We recognise the debilitating effects that stress can have, and we do everything we reasonably can to minimise the impact within our membership. However, we rely on you to tell us if you are feeling the effect of stress, or if you think somebody else is.

We recognise that similar circumstances can result in different reactions from different people. We are not all the same. Just because one person copes in a particular situation, it does not mean that others will not find it stressful.

TALK TO US

We encourage open conversation about all aspects of wellbeing. If you are worried about anything to do with your physical or mental health, or that of a colleague, you should speak with a board member or a member of HR.

Don't put this conversation off. The earlier you tell us about any difficulties you are having, or your concerns about another members wellbeing, the quicker we will be able to start helping. It means you (or they) will not be struggling alone.

HOW WE WILL RESPOND

Whether you have told us about an issue relating to your wellbeing, or it has come to our attention in a different way, we will meet with you to discuss it.

We may carry out a risk assessment. We would expect you to cooperate with this and contribute, where asked, to the process.

We will agree with you a strategy for supporting you and adjusting your volunteering environment, your role, and your terms of volunteering. For example:

- Giving you different responsibilities.
- Altering your hours of volunteering.

It will be difficult for us to help you unless you let us have those conversations about your wellbeing and potential remedial steps. Duties of confidentiality will apply. If confidentiality is breached by a member, we may decide to take disciplinary action.

If we are concerned that you may pose a threat to yourself or to others, we may take immediate appropriate action without your consent. That could include contacting your family members, specialist support, or the emergency services, and sharing with them information about your mental health.

If issues to do with your wellbeing involve colleagues, customers, clients, or others associated with our Club, we will address those. That will usually mean we will need to discuss with them at least some of the issues you have told us about. Where somebody in the Club has behaved inappropriately, we

may investigate and take disciplinary action against them.

When you talk to us about your mental health, or you tell us your genuinely held concerns about a colleague, we will do everything reasonable to ensure that you are not victimised or otherwise treated badly for having done so or subjected to bullying or harassment as a consequence. We want you to report issues and ask for support without fearing negative consequences.

We have an over-riding responsibility for your health and safety. Sometimes this may mean we make decisions you disagree with. We will always listen to your input and if there are occasions when we act against your preferred course of action, we will explain why we are doing so.

EXTERNAL SUPPORT

We aim to provide comprehensive wellbeing support from within our Club and our network of associates and contacts.

If you need time off from volunteering for support purposes we will try and accommodate this, however it is important that you discuss this need for time off in advance.

We also recognise that external support can be valuable, and you may find the following useful:

www.mind.org.uk

www.samaritans.org

Social Media Policy

OVERVIEW

This policy explains your responsibilities when you use social media, on Club premises, while volunteering for or representing us, or in your own time.

This policy applies to all volunteers and anyone else working for us.

We may monitor your use of social media may, along with your wider use of Club IT resources. It's to make sure you are complying with this policy. Whenever you use our IT resources and systems, you give us your consent to monitor your activities.

We may require you to remove any social media content that breaches this policy, and you could face legal proceedings if comments you post about the Club or named individuals are found to have harmed our or their reputation.

This section is in line with the Communications act 2003 section 127 "Improper use of public electronic communications network"



WHAT IS SOCIAL MEDIA?

Social media is always developing. It includes websites and applications that allow users to create and share content and/or take part in online networking. The most popular sites include the following (but this policy covers all social media, not just those listed below):

- Facebook
- X
- LinkedIn
- YouTube
- Instagram
- Snapchat
- WhatsApp
- TikTok
- Pinterest
- Flickr
- Tumblr
- Reddit

This policy also covers personal blogs, any posts you might make on other people's blogs, any podcasts you create or contribute to, and all online forums and noticeboards.

USING SOCIAL MEDIA AT THE CLUB

You may use Club IT resources and your own equipment to access social media during operating hours as long as you follow this policy, and you are not involved in creating any inappropriate or unprofessional content. Your use must not interfere with your duties.

You must not post personal content on any Club social media account you are authorised to use, or any account you set up for the purpose of helping you fulfil your employment duties. These accounts belong to us, and your access will be stopped if you abuse this policy in any way. If you leave the Club your access will also be stopped, and we will ask for your usernames and passwords. We may also ask

for them at any other time and in either case you must supply them straightaway.

YOUR RESPONSIBILITIES WHEN USING SOCIAL MEDIA

Always identify yourself, and if the content makes it desirable, make it clear your opinions are your own and you are not speaking on the Club's behalf. You might consider doing this in a disclaimer. Use a personal email address, not your Club email address, and do not create a social media account that could be mistaken for a corporate account we have set up or could set up.

It is your duty to protect the Club's interests, and you must not publish anything that could directly or indirectly damage these or compromise our reputation. You must never speak on the Club's behalf on social media unless authorised to do so and you must always make sure anything you do post is accurate, appropriate, and lawful. Always get your colleagues' permission before posting images of them or any of their personal details.

You must take personal responsibility for your social media content. If you can be identified as volunteering for the Club, you must make sure your profiles, and anything you post, fit with how we expect you to present yourself to clients or customers, business associates and colleagues. Be mindful that even if you do not name us as, people who know you and where you volunteer may still make an association with the Club. If you are in any doubt about what is and is not acceptable, please talk to a board member

You must always show respect to others when using social media. You must never criticise the Club, our members, suppliers, business associates, your colleagues or anybody else you come into contact with professionally. Our other policies — in particular our Harassment and Bullying Policy and Equal Opportunities Policy — give guidance on the type of behaviour we consider unacceptable in the Club, and we expect you to maintain the same high standards when using social media. Specifically, we will not tolerate any of the following:

- Abusive or threatening language.
- Sexually explicit language or images.
- Unlawful or disrespectful comments.
- Trolling (starting or pursuing arguments in an online community with the intention of disrupting normal discussions within that community).
- False or misleading statements.
- Impersonating your colleagues or third parties.
- Inciting somebody to commit a crime.

If another Club member is using social media to bully, harass or victimise you, you must follow the process laid out in our Harassment and Bullying Policy.

You must always respect Club confidentiality and not use social media to comment on sensitive business matters, including — but not restricted to — the following:

- Our intellectual property.
- Our trade secrets.
- Our current or future trading performance.
- Any information intended for internal use only.
- Anything to do with our customers, clients, or suppliers.
- Anything else that is not already in the public domain.

You must never use our logo, trademark, or other corporate artwork in anything you post or as part of any of your social media profiles.

Always be aware of the public nature of social media. Even content posted on a restricted forum can quickly be shared across other social media and you must assume that anything you publish anywhere will sooner or later reach the public domain. When you share content posted by others, remember that you may be seen as giving tacit approval to opinions that could bring the Club into disrepute.

You must never air on social media grievances about the Club or any of our activities. You should use our internal process if you want to make a complaint, raising it first with a board member. If the issue remains unresolved, you must then follow our Grievance Policy. You may also want to consider our Whistleblowing Policy.

OTHER SOCIAL MEDIA GUIDANCE

Always respect copyright and other intellectual property rights and always check whether or not a third party's content is protected before you reuse or re-post it.

You are not allowed to add the details of business contacts you make through volunteering to any of your personal social media accounts.

The contact details of any business contacts you make while volunteering for the Club belong to us and must remain confidential. When you leave the Club, you must give us this data and delete any copies you have, including any you have added to your social media accounts.

You should contact a board member if you find anything posted to a social media site that breaches this policy or otherwise brings the Club into disrepute.

Whistleblowing Policy

OVERVIEW

This policy outlines what you should do if you suspect something at the Club is putting you or others in danger or is illegal or unethical.

This policy applies to all employees, contractors, consultants, officers, volunteers, interns, casual and agency workers.



WHAT IS WHISTLEBLOWING?

We aim to maintain high standards of integrity in everything we do. However, all companies can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. If you have any such concerns, we encourage you to report them immediately — this is called ‘whistleblowing’. We will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.

The types of concerns you may want to raise with us by whistleblowing might include:

- any activity you suspect is criminal (facilitating tax evasion, for example).
- any activity you suspect puts health and safety at risk.
- any activity you suspect may damage the environment.
- any activity you suspect breaches our Bribery Policy.
- any failure to comply with legal or regulatory obligations.
- any failure to meet professional requirements; and/or
- any attempt to conceal one or more of these activities.

Speak to a Club Board member if you are not sure whether something you have become aware of is covered by this policy. If your complaint is about the way people behave towards you, then you should refer to our policy on Bullying and Harassment, or to our Grievance Policy, for guidance on how to proceed.

HOW TO RAISE A WHISTLEBLOWING CONCERN

In most cases, you should start by raising your concerns with a board member, either face-to-face or in writing.

If you would prefer not to go to a board member, you should write to one of the Club’s directors. You should also do this if your concerns are of a very serious nature.

Your letter should say that you are raising your concerns under this policy and then explain what these concerns are. Include all the key facts, dates, and the names of the people involved.

You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

After the initial meeting, we will investigate your concerns, and we may ask you to attend further meetings. To investigate properly, we may involve specialists with knowledge or experience of the issues you have raised.

We will keep you informed in general terms about how our investigation is progressing and how long it is likely to take. We may not be able to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating and so we will do our best to reassure you that things are in hand and to explain why

we are acting in the way we are.

Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigation will be the one you want. If you are not satisfied with how we have conducted the investigation, you can take the matter to a member of the board for further consideration.

Most concerns are raised with good intentions, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our Disciplinary Policy and is at risk of being dismissed for gross misconduct.

CONFIDENTIALITY AND ANONYMITY

There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing.

Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't properly establish whether allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

If you do not feel comfortable in reporting your concern openly, tell us and we will do all we can to protect your identity. We may want to disclose your identity to people involved in the investigation, but we will always discuss this with you first.

You are protected from reprisals under this policy, but if you are still worried, talk to us. We will explore how far we can go in keeping your concerns confidential.

HOW WE PROTECT WHISTLEBLOWERS

If you raise a genuine concern under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation or other activity set out earlier in this policy. However, if you feel you have been treated badly because of raising a concern, you must tell us straightaway. First inform a board member and, if the matter remains unresolved, you must follow the formal process in our Grievance Policy.

All whistleblowers are given the same protection, so you must not threaten or otherwise badly treat others who have raised concerns under this policy. If you do, we may terminate your volunteer agreement. The whistleblower may also be able to bring legal action against you.

You can get further advice on whistleblowing, protecting confidentiality, and being protected from reprisals from www.protect-advice.org.uk. Protect is an independent charity that also offers an advice line (020 3117 2520).

TAKING YOUR CONCERNS OUTSIDE THE CLUB

This policy outlines the process for raising, investigating, and resolving wrongdoing within the Club. It is rarely necessary – or, from our point of view, desirable – for anyone outside the Club to become involved when a whistleblowing allegation is made.

In some exceptional circumstances, you may need to go to an external body — an industry regulator, for example. The independent charity Protect (details above) can direct you towards the appropriate regulator for the type of issue you want to raise.

This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our members. If you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. A board member will be able to explain how you should proceed.

Alerting the media to a concern — particularly before or during an internal investigation — is almost



never justified or appropriate in any situation. We strongly discourage you from doing so and will treat any contact with the press as a serious issue justifying the termination of your volunteer agreement.

We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or protect before being justified in approaching the press.