



Giffnock Tennis Squash & Hockey Club

Welfare Policies and Procedures

CONTENTS

- 1) Giffnock Tennis Squash & Hockey Club Safeguarding Policy (child and adult at risk)
 1. Policy Statement
 2. Use of Terminology
 3. Scope
 4. Responsibility for the implementation of the Safeguarding Policy, Code of Conduct and Reporting Procedure
 5. Breaches of the Safeguarding Policy, Code of Conduct and Reporting Procedure
 6. Whistleblowing

- 2) Giffnock Tennis Squash & Hockey Club Diversity and Inclusion Policy

- 3) Giffnock Tennis Squash & Hockey Club Changing Room Policy

- 4) Giffnock Tennis Squash & Hockey Club Photography and Recording Policy

- 5) Giffnock Tennis Squash & Hockey Club Social Media Policy

- 6) Giffnock Tennis Squash & Hockey Club Anti-Bullying Policy

- 7) Giffnock Tennis Squash & Hockey Club Code of Conduct

- 8) Giffnock Tennis Squash & Hockey Club Privacy Policy

- 9) Giffnock Tennis Squash & Hockey Club GDPR Privacy Notice

Section 1

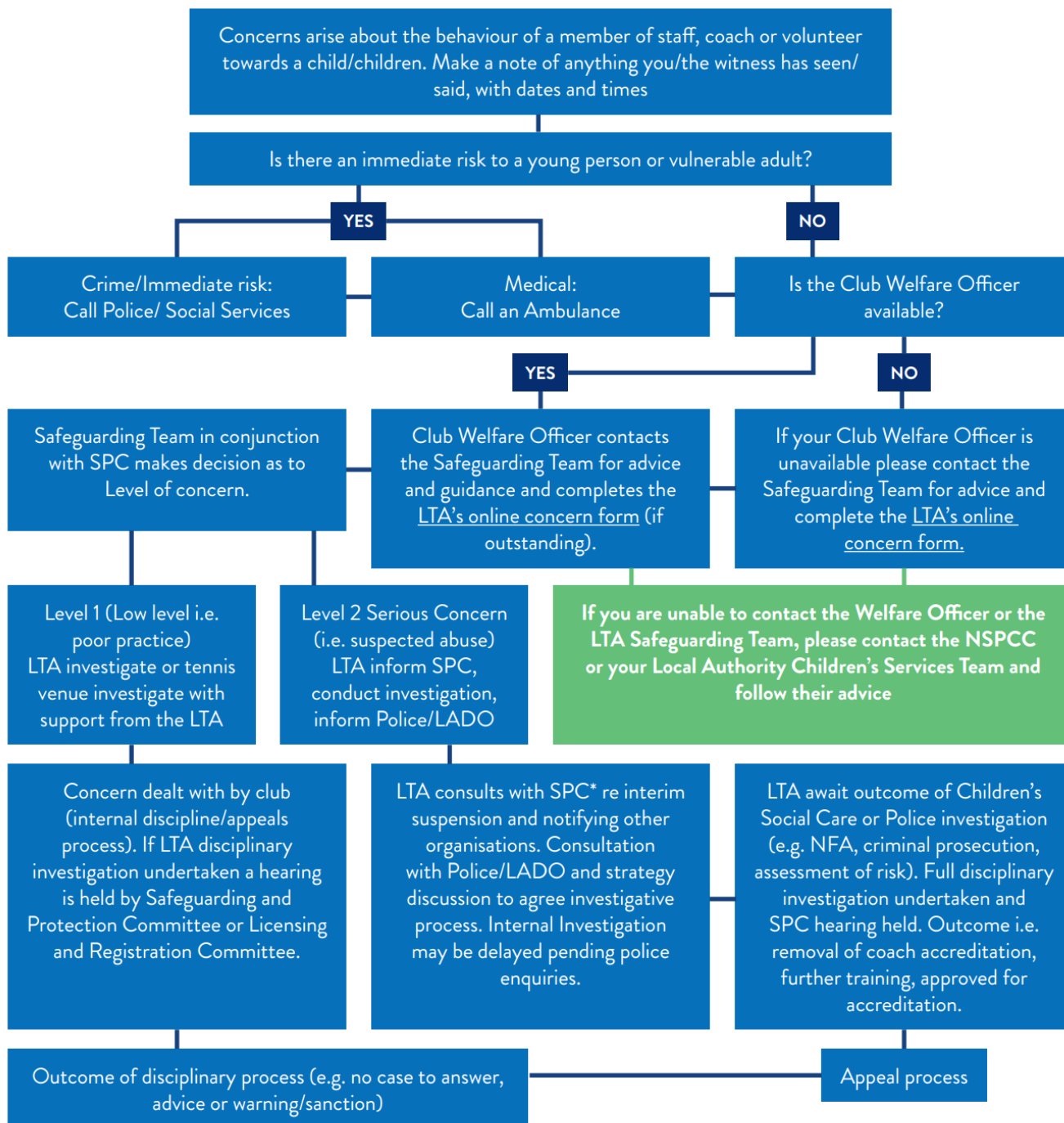
Giffnock Tennis Squash & Hockey Club **Safeguarding Policy**

Note: while the policies outlined in this document are derived from LTA guidance the Club will refer individual cases to the appropriate governing body based on membership category (i.e. the LTA, Tennis Scotland, Scottish Squash or Scottish Hockey). The default position will be to comply with LTA procedures in all cases and to make additional submissions to additional governing bodies if there is any doubt as to how to proceed.

Reporting a Safeguarding Concern within the Tennis Environment

How to respond to allegations against a member of staff/volunteer or another young person within the Tennis Environment.

For Tennis Scotland cases, on-going consultation will take place with them.



Reporting a safeguarding concern in the Squash or Hockey environments follows the same basic flow chart with Scottish Squash or Scottish Hockey substituted for the LTA/Tennis Scotland, as appropriate. Please note, in Scotland Children 1st, not the NSPCC, are the competent authority to contact in the absence of being able to contact the Welfare Officer (green cell), who can be contacted on 08000 28 22 33.

Safeguarding Policy

1. Policy statement

The Giffnock Tennis Squash & Hockey Club is committed to prioritising the well-being of all children and adults at risk, promoting safeguarding in our club at all times, including all programmes and events we run. All activities, events and competitions arranged by the club run in accordance with the LTA's Safeguarding at Events, Activities and Competitions guidance and are compliant with all Scottish Squash and Scottish Hockey Union policies. This Policy strives to minimise risk, deliver positive tennis/squash/hockey experience for everyone and respond appropriately to all safeguarding concerns/disclosures.

2. Use of terminology

Child: a person under the age of eighteen years.

Note that some legislation in Scotland defines a child as a person under sixteen years old. However, where there is any safeguarding concern, anyone under the age of 18 is regarded as a child unless advised otherwise by the LTA Safeguarding Team.

Adult at risk: a person aged eighteen years or over who is, or may be, in need of community care services by reason of disability, age or illness; and is, or may be, unable to take care of, or unable to protect him or herself against abuse or neglect.

Safeguarding children: protecting children from abuse and neglect, preventing the impairment of children's health or development, ensuring that they grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best life chances.

Safeguarding adults at risk: protecting adults from abuse and/or neglect. Enabling adults to maintain control over their lives and make informed choices without coercion. Empowering adults at risk, consulting them before taking action, unless someone lacks the capacity to make a decision, or their mental health poses a risk to their own or someone else's safety, in which case, always acting in his or her best interests.

(See appendix A for full glossary of terms).

3. Scope

This Policy is applicable to all staff, volunteers, committee members, coaches and club members. It is in line with national legislation and applicable across the UK.

Advice, guidance and support is available from the LTA Safeguarding Team.

4. Responsibility for the implementation of the Safeguarding Policy, Code of Conduct and Reporting Procedure

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY: NOT RESPONDING TO A SAFEGUARDING CONCERN IS NOT AN OPTION.

- Our club's committee has overall accountability for this Policy and its implementation
- Our club Welfare Officer is responsible for updating this Policy in line with legislative and club developments
- All individuals involved in/present at the club are required to adhere to the Policy and Code of Conduct
- The LTA Safeguarding Team and Tennis Scotland Safeguarding Leads can offer support to help clubs proactively safeguard. Scottish Squash and Scottish Hockey Union Safeguarding personnel are also able to offer support where required.

Where there is a safeguarding concern/disclosure:

- The individual who is told about, hears, or is made aware of the concern/disclosure is responsible for following the Reporting a Safeguarding Concern Procedure shown in the flowchart at the beginning of this policy. Unless someone is in immediate danger, they should inform their club Welfare Officer, LTA Safeguarding Team or National Safeguarding Lead.
- The club Welfare Officer and Safeguarding Leads are responsible for reporting safeguarding concerns to the LTA Safe Safeguarding Team.
- The LTA Safeguarding Team is responsible for assessing all safeguarding concern/disclosures that are reported to them and working with the club Welfare Officer and National Safeguarding Leads to follow up as appropriate on a case-by-case basis, prioritising the well-being of the child/ adult at risk at all times. Dependent on the concern/disclosure, a referral may be made to:
 - The police in an emergency (999);
 - Local Authority Children's Services (0141 577 8300);
 - Local Authority Adult Services (0141 451 0866).

5. Breaches of the Safeguarding Policy, Code of Conduct and Reporting Procedure

Breaches of this Policy and/or failure to comply with the outlined responsibilities may result in the following:

- Disciplinary action leading to possible exclusion from the club, dismissal and legal action
- Termination of current and future roles within the club and roles in other clubs, the LTA, Tennis Scotland, Scottish Squash and the Scottish Hockey Union.

Actions taken by players, parents or carers, staff, consultants, volunteers, officials, coaches inside or outside of the club that are seen to contradict this Policy may be considered a violation of this Policy.

Where an appeal is lodged in response to a safeguarding decision made by the club, the individual should adhere to the club's appeal procedure.

6. Whistleblowing

Safeguarding children and adults at risk requires everyone to be committed to the highest possible standards of openness, integrity and accountability. As a club, we are committed to encouraging and maintaining a culture where people feel able to raise a genuine safeguarding concern and are confident that it will be taken seriously.

What is whistle blowing?

In the context of safeguarding, "whistle blowing" is when someone raises a concern about the well-being of a child or an adult at risk.

A whistle blower may be:

- a player;
- a volunteer;
- a coach;
- other member of staff;
- an official;
- a parent;
- a member of the public.

How to raise a concern about a child or an adult at risk at the club

If a child or an adult at risk is in immediate danger or risk of harm, the police should be contacted by calling 999.

Where a child or an adult at risk is not in immediate danger, any concerns about their well-being should be made without delay to the Club Welfare Officer. The Club Welfare Officer will pass the details of the concern on to the LTA Safeguarding Team at the earliest opportunity and the relevant local authority and the police will be contacted, where appropriate – or to Scottish Squash or the Scottish Hockey Union as the relevant governing body based on membership category.

If, however, the whistle blower does not feel comfortable raising a concern with the Club Welfare Officer, the whistle blower should contact the LTA Safeguarding Team directly on 020 8487 7000, the Local Authority Designated Officer (LADO) or the Children 1st on 08000 28 22 33.

The Club Welfare Officer can be contacted by email at: welfare@giffnock-ltc.co.uk or by telephone please call Richard Cook on 07951 362892.

Information to include when raising a concern

The whistle blower should provide as much information as possible regarding the incident or circumstance which has given rise to the concern, including:

- their name and contact details (unless they wish to remain anonymous);
- names of individuals involved;
- date, time and location of incident/circumstance; and
- whether any witnesses were present.

What happens next?

All concerns raised by a whistle blower about the well-being of a child or an adult at risk will be taken seriously and every effort will be made to deal with each concern fairly, quickly and proportionately.

If the whistle blower does not believe that the concern has been dealt with appropriately and wishes to speak to someone outside the club they can contact the LTA Safeguarding Team or Children 1st on 08000 28 22 33 or by emailing cfs@children1st.org.uk.

Support

The club will not tolerate any harassment, victimisation or unfair treatment of, and will take appropriate action to protect, whistle blowers when they raise a concern in good faith.

This Policy is reviewed every two years (or earlier if there is a change in national legislation).

This Policy is recommended for approval by:

Club President *Vivienne MacLaren*:

Date: 20/11/22

Club Welfare Officer *Richard Cook*:

Date: 20/11/22

Appendix A: Glossary of Terms

Safeguarding: protecting **children** from abuse and neglect, preventing the impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best life chances. Enabling **adults at risk** to achieve the outcomes that matter to them in their life; protecting their right to live in safety, free from abuse and neglect. Empowering and supporting them to make choices, stay safe and raise any concerns. Beginning with the assumption that an individual is best-placed to make decisions about their own wellbeing, taking proportional action on their behalf only if someone lacks the capacity to make a decision, they are exposed to a life-threatening risk, someone else may be at risk of harm, or a criminal offence has been committed or is likely to be committed.

Abuse and neglect

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness

Sexual abuse: Involves forcing or enticing a child or young person to take part in abuse sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

Emotional abuse: The persistent emotional maltreatment of a child or adult at risk such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to a child/ adult at risk that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person; not giving them opportunities to express their views; deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed, including interactions that are beyond a child or adult at risk's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing a child or adult at risk to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect: The persistent failure to meet a child/ adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. It may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child/ adult at risk from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's or adult at risk's basic emotional needs. Neglect may occur during pregnancy as a result of maternal substance abuse.

Additional examples of abuse and neglect of adults at risk

Financial abuse: having money or property stolen; being defrauded; being put under pressure in relation to money or other property; and having money or other property misused.

Discriminatory abuse: treating someone in a less favourable way and causing them harm, because of their age, gender, sexuality, gender identity, disability, socio-economic status, ethnic origin, religion and any other visible or non-visible difference.

Domestic abuse: includes physical, sexual, psychological or financial abuse by someone who is, or has been a partner or family member. Includes forced marriage, female genital mutilation and honour-based violence (an act of violence based on the belief that the person has brought shame on their family or culture). Domestic abuse does not necessarily involve physical contact or violence.

Psychological abuse: including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Organisational abuse: where the needs of an individual are not met by an organisation due to a culture of poor practice or abusive behaviour within the organisation.

Self-neglect: behaviour which threatens an adult's personal health or safety (but not that of others). Includes an adult's decision to not provide themselves with adequate food, clothing, shelter, personal hygiene, or medication (when indicated), or take appropriate safety precautions

Modern slavery: encompasses slavery, human trafficking, criminal and sexual exploitation, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- A person who is being abused may experience more than one type of abuse
- Harassment, and bullying are also abusive and can be harmful
- Female Genital Mutilation (FGM) is now recognised as a form of physical, sexual and emotional abuse that is practised across the UK
- Child Sexual Exploitation is recognised as a form of sexual abuse in which children are sexually exploited for money, power or status
- Child trafficking is recognised as child abuse where children are often subject to multiple forms of exploitation. Children are recruited, moved or transported to, or within the UK, then exploited, forced to work or sold
- People from all cultures are subject to abuse. It cannot be condoned for religious or cultural reasons
- Abuse can have immediate and long-term impacts on someone's well-being, including anxiety, depression, substance misuse, eating disorders and self-destructive Conducts, offending and anti-social Conduct
- Those committing abuse are most often adults, both male and female. However, child-to-child abuse also takes place.

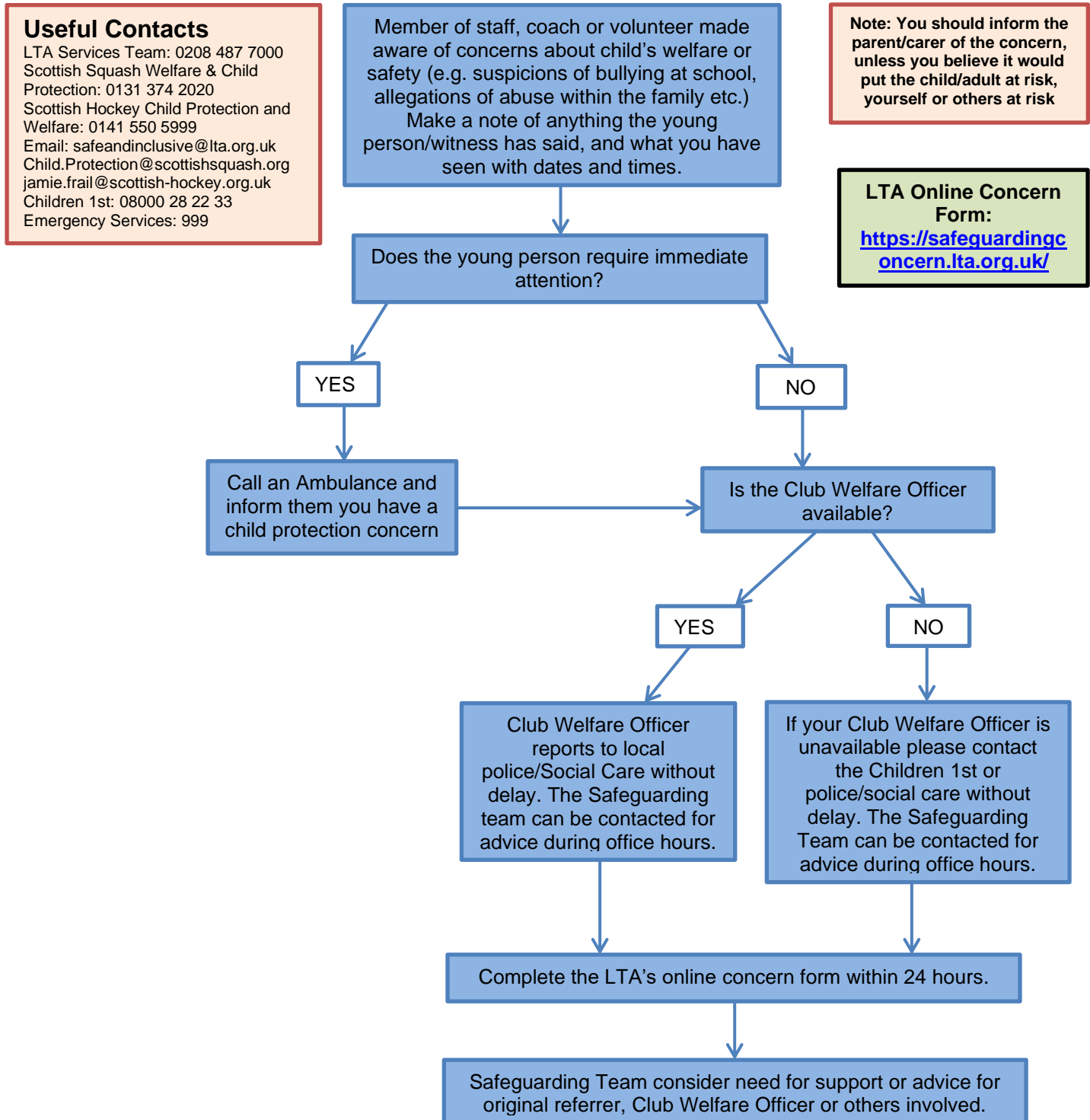
Appendix B: What to do if a disclosure from a child or adult at risk is made to you:

1. **Listen** carefully and calmly to the individual
2. **Reassure** the individual that they have done the right thing and what they have told you is very important
3. **Avoid questioning** where possible, and never ask leading questions
4. **Do not promise secrecy.** Let the individual know that you will need to speak to the Welfare Officer/LTA Safeguarding Team because it is in their best interest. If you intend to speak to the police or social care, you should let them know this too.
5. **Report the concern.** In an emergency, call the police (999), otherwise talk to the Welfare Officer/LTA Safeguarding Team/Scottish Squash/Scottish Hockey Union as soon as possible. Do not let doubt/personal bias prevent you from reporting the allegation.
6. **Record** details of the disclosure and allegation using the LTA's online reporting a concern form within 24 hours. *If you do not have access to the online form, write down the details using what you have available then sign and date it. The Club template form is available in the filing cabinet at all times.*

Appendix C: Reporting a Safeguarding Concern outside the Tennis/Squash/Hockey Environment

What to do if you are worried that a child is being abused outside the tennis/squash/hockey environment (e.g. at home, school or in the community) but the concern is identified through the child's involvement in tennis/squash/hockey.

For Tennis Scotland cases, on-going consultation will take place with them.



Section 2

Giffnock Tennis Squash & Hockey Club

Diversity and Inclusion Policy

Diversity and Inclusion at Giffnock Tennis Squash & Hockey Club

This Policy sets out our commitment to diversity and inclusion and supports our overall aim for diversity and inclusion to ensure that:

- Tennis, squash and hockey are diverse and inclusive
- Diversity and inclusion are embedded in our club's culture and our behaviours
- We create a culture where inclusive leadership thrives
- We take a proactive approach using positive action to ensure that communities and individuals are valued and able to achieve their full potential.

To achieve these aims we believe that everyone involved in tennis squash and hockey has a vital role to play in promoting diversity and inclusion and we ask everyone to become Safe and Inclusive Tennis Squash and Hockey Champions – proactively promoting Safe and Inclusive tennis, squash and hockey and taking action against all forms of discrimination.

We are proud to have a Diversity and Inclusion Policy that demonstrates our commitment to making tennis, squash and hockey diverse and inclusive. The commitment to Diversity and Inclusion is upheld by all - Lawn Tennis Association (LTA), Tennis Scotland, Scottish Squash and Scottish Hockey.

These commitments are fully supported by the Giffnock Tennis Squash & Hockey Club Committee.

Together we can make a positive difference to people from different backgrounds to participate in Tennis at our club.

Thank you.

Diversity and Inclusion Policy

1. Policy Statement

This Diversity and Inclusion Policy is applicable to Giffnock Tennis Squash & Hockey Club and is based on similar policies of:

- The Lawn Tennis Association (LTA)
- Tennis Scotland
- Scottish Squash
- Scottish Hockey.

As a club we contribute actively to enable more people to play tennis, squash and hockey more often, in a manner that it is safe, inclusive, and fair. This applies regardless of a person's age, disability, gender reassignment status, sex, marital or civil partnership status, pregnancy or maternity, race, sex, sexual orientation, religion, race or sexual orientation, socio-economic status or any other background.

We recognise that many concerns and/or disclosures may have both safeguarding and diversity and inclusion elements to them. This policy reflects this through its reporting procedures, which replicate the safeguarding concern reporting procedures.

This Policy strives to minimise risk and support our venue, programmes, events and individuals to deliver and experience a positive tennis experience for everyone. The Reporting Procedures in page 2 outlines how to respond to safeguarding or discrimination concerns/disclosures.

2. Use of Terminology

We have adopted the following definitions to explain our approach to diversity and inclusion in tennis:

Discrimination – treating someone in a less favourable way and causing them harm, because of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation

Diversity – acknowledging, celebrating and respecting the differences between groups of people and between individuals. We will work to ensure that people can be assured of an environment in which their rights, dignity and individual worth are respected, and in particular that they are able to enjoy their sport without the threat of intimidation, victimisation, harassment or abuse.

Harassment – unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating and intimidating, hostile, degrading, humiliating or offensive environment for that individual or creates an intimidating, hostile, degrading, humiliating or offensive environment. The focus is on the perception of the complainant not the intent of the perpetrator. Employees can complain of behaviour they find offensive even if it is not directed at them.

Inclusion – ensuring that tennis is equally accessible to any member of the community so they can be fully involved in whatever capacity they choose; and that they are supported to achieve their potential in any capacity e.g. player, employee, volunteer, coach or official. We will work to ensure that people have a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, that they feel respected and valued and are not singled out, with regard to their age, disability, gender reassignment status, sex, marital or civil partnership status, pregnancy or maternity, race, sex, sexual orientation, religion, race or sexual orientation, socio-economic status or any other background.

Positive action – Giffnock Tennis Squash & Hockey Club is committed to taking positive steps to counteract the effects of physical or cultural barriers – whether real or perceived – that restrict the opportunity for all sections of the community to participate equally and fully. We will ensure that we institute, support or contribute to appropriate measures or initiatives that enable access to tennis and participation in associated activities by people from any group that is under-represented in tennis or has difficulty accessing it and that they can do so with dignity or without being singled out.

(See Appendix A for full glossary of terms)

3. Scope

Giffnock Tennis Squash & Hockey Club has direct safe and inclusive responsibility for:

- Staff, consultants, coaches and officials they employ;
- Volunteers, including board members and councillors they recruit;
- Venues they own;
- Events and programmes they run; and
- Ensuring all accreditation requirements are met by accredited coaches, officials and venues.

We recommend and support the development of good diversity and inclusion practice to:

- Accredited coaches, officials and venues;
- Players, parents and carers;
- Volunteers recruited by other organisations;
- Venues hired by or on our behalf
- Club Events.

This Policy is in line with national legislation (see appendix B for details of the relevant legislation) and applicable to our club, specifically to every person and place that we have direct safe and inclusive responsibility for.

4. Responsibility for implementation of the Diversity and Inclusion Policy

Diversity and inclusion is everyone's responsibility: not responding to discriminatory or unacceptable language and behaviour is not an option.

- The club's Committee and President have overall accountability for this Policy and Reporting Procedure, for being the strategic lead on diversity and inclusion and for ensuring compliance with the relevant legislation.
- The club's President and Welfare Officer have overall responsibility for implementation of the policy.
- The President and Welfare Officer of the club are responsible for updating this Policy and Reporting Procedure in line with legislative and organisational developments; and develop a strategic and proactive approach to diversity and inclusion and respond to discrimination concerns.
- Giffnock Tennis Squash & Hockey Club's Welfare Officer is responsible for supporting the club to identify where diversity and inclusion support is required; to implement safe and inclusive procedures; promote diversity and inclusion principles, including the Safeguarding and Reporting Procedure, to all the venues they manage, programmes, events and individuals including players, parents and carers.
- All staff, consultants, coaches, officials and volunteers involved in tennis are responsible for raising diversity and inclusion concerns with the club's Welfare Officer to start with; then the Safe and Inclusive Tennis team if applicable, as outlined in the Reporting Procedure.
- Players, parents and guardians are responsible for upholding the Code of Conduct and Reporting Procedure.

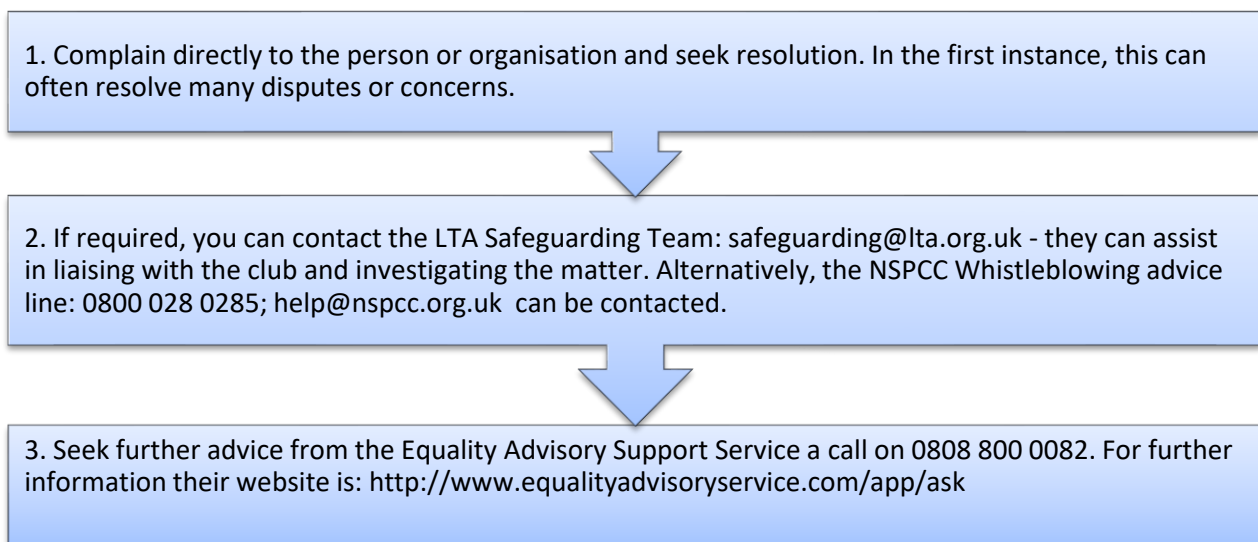
- Giffnock Tennis Squash & Hockey Club is committed to:
 - formally adopt this policy,
 - take steps to ensure that our committee, members, participants and volunteers behave in accordance with the policy, including where appropriate taking disciplinary action under our constitution;
 - ensure that access to membership as well as access to participation is open and inclusive;
 - publish accurate information about the location and accessibility of our facilities; and
 - support measures and initiatives that British Tennis may institute or take part in to advance the aims of this policy as part of our commitment to our LTA membership.

Where there is a diversity and inclusion concern/disclosure:

- The individual who is told about, hears, or is made aware of the concern/disclosure is responsible for following the [Concern Reporting Procedure](#) above

5. Breaches of the Diversity and Inclusion Policy, Standards, Code of Conduct and Reporting Procedure

Where there are concerns that diversity and inclusion good practice has not been followed, all staff are encouraged to follow the club's whistleblowing policy; consultants, coaches, officials, volunteers and players are encouraged to:



If someone comes to you with a concern around discrimination, listen to their complaint, reassure them and advise them of the routes listed above (1-3).

Breaches of this Policy and/or failure to comply with the outlined responsibilities may result in the following by the LTA, Tennis Scotland, Tennis Wales and/or the Tennis Foundation:

- Venues – Potential removal of LTA accreditation
- Staff – disciplinary action leading to possible dismissal and legal action.
- Contracted consultants, officials and coaches – termination of current and future roles within all four organisations and possible legal action.
- Recruited volunteers, including councillors and board members – termination of current and future roles within all four organisations and possible legal action.

Actions taken by staff, consultants, volunteers, officials, coaches, venues, clubs and/or events outside of the LTA, Tennis Scotland, Tennis Wales and/or the Tennis Foundation that are seen to contradict this Policy may be considered a violation of this Policy.

Where an appeal is lodged in response to a safeguarding decision made by the LTA Safeguarding Team and Safeguarding and Protection Committee and/or Licensing and Registration Committee, an independent appeal body such as Sport Resolutions may be used. Their decision is final.

6. Related policies and guidance [examples of other policies provided below – please delete as appropriate]

- Safeguarding Policy
- Whistle-blowing Policy
- Anti-Bullying Policy
- Disciplinary Policy
- Data Protection Policy

Appendix A:

Glossary of terms

Age: This refers to a person belonging to a particular age group, which can mean people of the same age (e.g. 32-year old's) or range of ages (e.g. 18 - 30-year old's, or people over 50).

Bisexual or Bi: – refers to a person who has an emotional and/or sexual orientation towards more than one gender.

Bullying: can involve any form of physical, emotional, sexual or discriminatory abuse. It can also include cyber-bullying – using social media or mobile phones to perpetrate bullying.

Direct discrimination: treating someone less favourably than another person because of a protected characteristic.

Disability: A person having a physical or mental impairment that has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Discrimination: treating someone in a less favourable way and causing them harm, because of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

Discrimination by association: discrimination against someone because they are associated with another person who possesses a protected characteristic.

Discrimination by perception: discrimination against someone because of the belief that someone possesses a protected characteristic.

Diversity: acknowledging and celebrating the differences between groups of people and between individuals.

Equality: treating everyone with fairness and respect and recognising and responding to the needs of individuals. Taking positive actions to address existing disadvantages and barriers affecting how people engage with and participate in tennis.

Ethnicity: the social group a person belongs to, and either identifies with or is identified with by others, as a result of a mix of cultural and other factors including language, diet, religion, ancestry and physical features traditionally associated with race. Ethnicity is essentially self-defined and may change over time.

Gay: refers to a man who has an emotional, romantic and/or sexual orientation towards men. Also, a generic term for lesbian and gay sexuality - some women define themselves as gay rather than lesbian.

Gender identity: this is an individual's internal self-perception of their own gender. A person may identify as a man, as a woman, as neither man or woman (non-binary) or as androgynous/polygender.

Gender reassignment: The process of changing or transitioning from one gender to another.

Harassment: unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual or creates an intimidating, hostile, degrading, humiliating or offensive environment. The focus is on the perception of the complainant not the intent of the perpetrator. Employees can complain of behaviour they find offensive even if it is not directed at them.

Hate crime: crime that is targeted at a person because of hostility or prejudice towards that person's disability, race or ethnicity, religion or belief, sexual orientation or transgender identity. This can be committed against a person or property.

Homophobia: the fear, unreasonable anger, intolerance or/and hatred toward homosexuality, lesbian gay and bisexual people whether that person is homosexual or not.

Inclusive leadership – leaders who are aware of their own biases and preferences, actively seek out and consider different views and perspectives to inform better decision-making. They see diverse talent as a source of competitive advantage and inspire diverse people to drive organisational and individual performance towards a shared vision.

An Inclusive Leader – is a role model exemplar of inclusive behaviour; listens to and seeks out the views of diverse people and takes account of these views, without bias, in the decisions they make; appreciates that a diverse group of people will generate more creative solutions to problems and encourages this; inspires people through a shared vision of future success and motivates them to deliver it; leverages difference for high performance and provides responsive excellence to customers', clients' and service users' needs; provides positive feedback to boost people's self-efficacy; puts effort into helping diverse people identify their talents and develop them for performance now and future advancement; communicates authentically and honestly in a way that inspires trust, loyalty and well-being.

Inclusion: recognising that people from different backgrounds may have difference needs and expectations and may experience barriers in trying to access tennis. An inclusive venue is one that takes steps to attract and engage with people from many different backgrounds and meet their needs so that everyone has a positive experience and has the opportunity to achieve their potential.

Indirect discrimination: a practice, policy or rule which applies to everyone in the same way, but that has a worse effect on some people than others.

LGBTQ: an acronym for Lesbian, Gay, Bisexual, Trans and Questioning.

Lesbian: a woman who has an emotional romantic and /or sexual orientation towards women.

Monitoring equality: refers to data collection and analysis to check if people with protected characteristics are participating and being treated equally. For example: monitoring of the number of people with a disability who play tennis at our venue.

Non-binary – an umbrella term for a person who does not identify as only male or only female, or who may identify as both.

Positive action: a range of lawful actions that seek to overcome or minimise disadvantages (for example in employment opportunities) that people who share a protected characteristic have experienced, or to meet their different needs.

Pregnancy and maternity: pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Questioning: it refers to the process of exploring your own sexual orientation and/or gender identity.

Race: refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Radicalisation, extremism and terrorist behavior: Radicalisation is the process by which a person comes to support terrorism and/or forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. There is no single way to identify an individual who is likely to be susceptible to extremist ideology. The internet and the use of social media can be a major factor in the radicalisation of people.

Reasonable adjustment: What is considered reasonable will depend on all the circumstances of the case including the size of an organisation and its resources, what is practicable, the effectiveness of what is being proposed and the likely disruption that would be caused by taking the measure in question as well as the availability of financial assistance

Religion or belief: religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex: refers to the biological makeup such as primary and secondary sexual characteristics, genes, and hormones. The legal sex is usually assigned at birth and has traditionally been understood as consisting of two mutually exclusive groups, namely men and women.

Sexual orientation: a person's emotional, romantic and/or sexual attraction to another person.

Trans: an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, cross dresser, non-binary, genderqueer (GQ).

Transphobia: the fear, unreasonable anger, dislike, intolerance or/and hatred toward trans people, whether that person has undergone gender reassignment or is perceived to have done that.

Transsexual Person: someone who has started the process of changing their gender identity is undergoing or has undergone gender reassignment.

Unconscious bias or implicit bias: this refers to a bias that we are unaware of, and which happens outside of our control. It is a bias that happens automatically and is triggered by our brain making quick judgments and assessments of people and situations, influenced by our background, cultural environment and personal experiences.

Victimisation: when someone is treated badly because they have made or supported a complaint or grievance.

Appendix B:

Legislation

The **Equality Act 2010**¹ legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it's unlawful to treat someone.

It is against the law to discriminate against anyone because of:

- age
- being or becoming a transsexual person
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion, belief or lack of religion/belief
- sex
- sexual orientation

These are called 'protected characteristics'.

People are protected from discrimination:

- at work
- in education
- as a consumer
- when using public services
- when buying or renting property
- as a member or guest of a private club or association

People are also protected from discrimination if:

- they are associated with someone who has a protected characteristic, e.g. a family member or friend
- they have complained about discrimination or supported someone else's claim

Discrimination can come in one of the following forms:

- direct discrimination - treating someone with a protected characteristic less favourably than others.
- indirect discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage.
- harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them.
- victimisation - treating someone unfairly because they've complained about discrimination or harassment.

¹ <http://www.legislation.gov.uk/ukpga/2010/15/contents>

Section 3

Giffnock Tennis Squash & Hockey Club

Changing Room Policy

Changing Room Policy

All camera equipment and use of mobile phones in changing areas is strictly prohibited.

Wherever possible, adults should avoid changing or showering at the same time as children.

Parents/carers need to be aware that on occasions, adults and children may need to share a changing facility. Parents/carers should supervise their children while in the changing room in such instances.

It is recommended that particular attention is given to the supervision of children aged 15 and under in changing rooms. It is advisable for adults not to be alone with any such child under these circumstances.

If children are uncomfortable changing or showering in public, no pressure should be placed on them to do so.

Our changing rooms are not suitable for the purpose of team talks.

Giffnock Tennis Squash & Hockey Club has a strict policy in relation to bullying and will not tolerate any form of bullying relating to its changing room area.

If you have any concerns please refer to our Safeguarding Policy, speak to our Welfare Convenor or email welfare@giffnock-ltc.co.uk in strictest confidence.

Section 4

Giffnock Tennis Squash & Hockey Club **Photography and Recording Policy**

Parents, Carers and Spectators

The LTA/Scottish Squash/Scottish Hockey encourages you to use photographic equipment to capture your child or friend playing tennis/squash/hockey.

You are required to register at an event if you wish to use any photographic equipment. The event organiser will ask anyone not registered to stop using photographic equipment and delete any images that may have been taken.

If you have concerns about inappropriate photography, this should be reported immediately to the event organiser, official or welfare officer.

Competition Organisers, Officials and other Professionals

If you are running an event, the LTA requests that you ensure that all parents, carers and spectators who want to use photographic equipment are registered with you.

If you wish to take photographs at an event or publish images following an event you must ensure you have consent from parents, carers or the individual (if over 18) prior to the event and that you are registered with the event organiser.

If you see any individual taking photographs which you deem to be intrusive or inappropriate you must address this in line with safeguarding procedures.

Children

It is okay for a photographer to take photos when you are on court, as long as your parent or carer has told the photographer it is alright.

If you see someone taking photos or filming that makes you feel worried, tell your parent or carer, or the event organiser or welfare officer straight away.

Consent

In order to take photographs or videos, prior to any event, you should ensure you have obtained consent from:

- The event organiser; and
- Parents, carers of all children involved.

In order to obtain consent you must explain why you are taking the images and what they will be used for. This ensures that parents or carers are giving informed consent. To achieve this it is strongly recommended you use the Consent and Emergency Contact Form.

Image and video content

All children featured in images or videos must be:

- Appropriately dressed with clothing covering their torso from their neck to thighs, e.g. a t-shirt and shorts or skirt;
- Featured with people engaging in tennis/squash/hockey;
- In groups with other children or adults where possible; and
- Representative of the diversity across tennis/squash/hockey, with regard to age, gender, ethnicity and disability.

Any inappropriate use of images should be reported to the LTA Safe and Inclusive Tennis Team and the Police.

Photographing and Videoing in Public Spaces

There is no law prohibiting the photography of individuals (including children) in public places. Subject to the below, individuals are permitted to:

- take photos of children without the consent of the parents/legal guardians, using a normal lens; and
- keep photos taken, however, if the person wishes to publish a recognisable image of the child, they are required to gain consent from the parents/legal guardian.

The above is permitted, provided the behaviour does not amount to harassment or a breach of privacy. Whether the behaviour amounts to harassment or a breach of privacy will depend on the facts in each case.

In practice, you might not want to get into whether there has been a breach of privacy or if the conduct amounted to harassment. If an individual is taking photographs in a public space and this is making the children, coach or parents uncomfortable, it is best to approach the photographer and politely request they stop taking photographs and remind them they are required to gain consent from parents if they wish to publish any photos.

NB: If the photographer has a long lens, they should be informed they are not allowed to use this when taking photos of people in public spaces.

Publishing Images

Remember to give adequate thought to the selection of images in publicity material both printed and online (including social media). Where possible, use a technique such as “watermarking” on the images.

All children featured can only be:

- Identified using their first name, although it is preferable that their name is not given;
- Printed or uploaded with written consent from parents/carers; and
- Shown engaging in tennis/squash/hockey activities.

For your safety it is recommended that you avoid the following:

- Images of children on their own;
- Images of children outside a tennis/squash/hockey environment;
- Streaming any content directly to a website; and
- Using any images for which you have not obtained consent (please use the Consent and Emergency Contact Form).

Please be aware that coaches, teachers and others may use video equipment as a legitimate coaching method. Tennis/squash/hockey players and their parents or carers should be made aware this forms part of the tennis/squash/hockey programme and that any recording will be destroyed after use.

Section 5

Giffnock Tennis Squash & Hockey Club **Social Media Policy**

Everyone involved in tennis, squash and hockey must recognise that the responsibility to safeguard exists both on and off the field of play. Coaches, club officials, volunteers and others in a position of trust in tennis, squash and hockey need to act responsibly, both on and off the court/field, and this includes the use of electronic communications. Clubs that set up websites or social media accounts have a responsibility to ensure safeguards are in place.

This policy provides guidance on the procedures that will support and underpin the use of social media within Giffnock Tennis Squash & Hockey Club. It is important that all staff, volunteers, coaches, or anyone working on behalf of the club or in a position of responsibility are aware of this policy and agree to the following terms in order to communicate responsibly.

The club should:

1. Refrain from publishing negative comments or pictures about other clubs, players, teammates, club members, or umpires and any controversial or potentially inflammatory subjects.
2. Avoid hostile, harassing or discriminatory communications based on a person`s race, sex, gender identity, national origin, colour, disability, age sexual orientation, veteran status, marital status, religion or any other status protected by law.
3. Identify all copyrighted or borrowed material with citations and links. When publishing direct paraphrased quotes, thoughts, ideas, photos or videos, give credit to the original publisher or author.
4. Review online posts and resolve any concerns about the propriety of Giffnock Tennis Squash & Hockey Club responses before they are posted if necessary. A nominated club member will monitor the club social networking page regularly and remove access from anyone behaving inappropriately.
5. If a blogger or any other online participant posts an inaccurate, accessory or negative comment about Giffnock Tennis Squash & Hockey Club or anyone associated with the club, do not respond to the post and contact the relevant governing body (LTA, Scottish Squash or SHU) for guidance/advice if necessary.
6. Ensure all the privacy settings are secure so that the page(s) are not used as a place to meet, share personal details or have private conversations.
7. Make sure everyone within Giffnock Tennis Squash & Hockey Club knows who is responsible for monitoring the content of the social networking areas and how to contact them.
8. Inform the relevant governing body (LTA, Scottish Squash or SHU) if inappropriate, threatening or offensive material is received as this may be needed as evidence.

Section 6

Giffnock Tennis Squash & Hockey Club **Anti-Bullying Policy**

ANTI-BULLYING POLICY

Giffnock Tennis Squash & Hockey Club (GTSHC) strives to ensure that all children (anyone under 18) and adults at risk are safeguarded from abuse and have an enjoyable tennis/squash/hockey experience.

Bullying is defined as a range of abusive behaviour that is repeated and intended to hurt someone either physically or emotionally.

This document sets out how to help prevent bullying from happening to all children and adults at risk. It also sets out how to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need. It also provides information to all staff, volunteers, children and their families about what should be done to prevent and deal with bullying.

This policy applies to all staff, coaches, volunteers and other adults associated with county.

We recognise that

- Bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm
- All children and adults at risk, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- Everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to bullying.

We will seek to keep children and adults at risk safe by

- Recognising that bullying is closely related to how we respect and recognise the value of diversity.
- Recognising our duty of care and responsibility towards safeguarding
- Promoting and implement this anti-bullying policy in addition to our safeguarding policy and procedures
- Ensuring that bullying behaviour is not tolerated or condoned
- Taking action to respond and deal with any reports of bullying towards children
- Encouraging children to play a part in developing and adopting appropriate behaviours
- Making sure our response to incidents of bullying takes into account:
 - the needs of the person being bullied
 - the needs of the person displaying bullying behaviour
 - the needs of others who may be affected
 - our county as a whole

Players, parents, coaches, volunteers and other members of staff will:

- Encourage individuals to speak out about bullying behaviour and report incidents of bullying behaviour they see to the Club Welfare Officer / County Safeguarding Officer (or suitable alternative county representative, e.g. county coach, tournament organiser etc).
- Respect every child's need for, and right to, a play environment where safety, security, praise, recognition and opportunity for taking responsibility are available
- Respect the feelings and views of others
- Recognise that everyone is important and equal, and that our differences make each of us special and worthy of being valued
- Show appreciation of others by acknowledging individual qualities, contributions and progress
- Ensure safety by having rules and practices carefully explained and displayed for all to see

Supporting children

- We'll let children know who will listen to and support them
- We'll create an "open door" ethos where children feel confident to talk to an adult about bullying behaviour
- Potential barriers to talking (including those associated with a child's disability or impairment) will be acknowledged and addressed at the outset to enable children to speak out

- Anyone who reports an incident of bullying will be listened to carefully and reports will be taken seriously
- Any reported experience of bullying behaviour will be investigated and will involve listening carefully to all those involved
- Children experiencing bullying behaviour will be supported and helped to uphold their right to play and live in a safe environment
- Those who display bullying behaviour will be supported and encouraged to develop better relationships
- We'll make sure that any sanctions are proportionate and fair

Support to the parents/carers

- Any experience of bullying behaviour will be discussed with the child's parents or carers
- Parents will be consulted on action to be taken (for both victim and bully)
- Information and advice on coping with bullying will be made available
- Support will be offered to parents, including information from other agencies or support lines

Related policies and procedures

This policy should be read alongside our county policies and procedures, including:

- Safeguarding Policy
- Diversity and Inclusion Policy
- Changing Room Policy
- Photography and Recording Policy
- Social Media Policy
- Code of conduct for staff and volunteers

Useful contacts

LTA: 0208 4877000/safeguarding@lta.org.uk

Children 1st: 08000 28 22 33

Childline: 0800 1111/www.childline.org.uk

Kidscape: www.kidscape.org.uk

Anti-Bullying Alliance: www.antibullyingalliance.org

This policy is reviewed every two years (or earlier if there is a change in national legislation)

Section 7

Giffnock Tennis Squash & Hockey Club **Code of Conduct**

Giffnock Tennis Squash & Hockey Club (GTSHC)

Code of Conduct and Complaints Procedure

Code of Conduct

All members of staff, volunteers and members agree to:

- Prioritise the well-being of all children and adults at risk at all times
- Treat all children and adults at risk fairly and with respect
- Be a positive role model. Act with integrity, even when no one is looking
- Help to create a safe and inclusive environment both on and off court/pitch
- Not allow any rough or dangerous behaviour, bullying or the use of bad or inappropriate language
- Report all allegations of abuse or poor practice to the club Welfare Officer
- Not use any sanctions that humiliate or harm a child or adult at risk
- Value and celebrate diversity and make all reasonable efforts to meet individual needs
- Keep clear boundaries between professional and personal life, including on social media
- Have the relevant consent from parents/carers, children and adults before taking or using photos and videos
- Refrain from making physical contact with children or adults unless it is necessary as part of an emergency or congratulatory (e.g. handshake / high five)
- Refrain from smoking and consuming alcohol during club activities or coaching sessions
- Ensure that they adhere to the zero-tolerance policy on use of drugs anywhere on the premises at GTSHC
- Ensure that alcohol is only consumed in line with published 'safe limits' so that there are no detrimental effects on others at GTSHC
- Ensure roles and responsibilities are clearly outlined and everyone has the required information and training
- Avoid being alone with a child or adult at risk unless there are exceptional circumstances
- Refrain from transporting children or adults at risk, unless this is required as part of a club activity (e.g. away match) and there is another adult in the vehicle
- Not abuse, neglect, harm or discriminate against anyone; or act in a way that may be interpreted as such
- Not have a relationship with anyone under 18 for whom they are coaching or responsible for
- Be acutely aware of the power that coaches and coaching assistants develop over players in the coaching relationship and avoid any intimacy (sexual or otherwise) with players

All children agree to:

- Be friendly, supportive and welcoming to other children and adults
- Play fairly and honestly
- Respect club staff, volunteers and Officials and accept their decisions
- Behave, respect and listen to your coach
- Take care of your equipment and club property

- Respect the rights, dignity and worth of all participants regardless of age, gender, ability, race, culture, religion or sexual identity
- Not use bad, inappropriate or racist language, including on social media
- Not bully, intimidate or harass anyone, including on social media
- Not smoke, drink alcohol or drugs of any kind on club premises or whilst representing the club at competitions or events
- Talk to the club Welfare Officer about any concerns or worries they have about themselves or others

All parents and carers agree to:

- Positively reinforce your child and show an interest in their tennis/squash/hockey
- Use appropriate language at all times
- Be realistic and supportive
- Never ridicule or admonish a child for making a mistake or losing a match
- Treat all children, adults, volunteers, coaches, officials and members of staff with respect
- Behave responsibly at the venue; do not embarrass your child
- Accept the official's decisions and do not go on court or interfere with matches
- Encourage your child to play by the rules, and teach them that they can only do their best
- Deliver and collect your child punctually from the venue
- Ensure your child has appropriate clothing for the weather conditions
- Ensure that your child understands their code of conduct
- Adhere to your venue's safeguarding policy, diversity and inclusion policy, rules and regulations
- Provide emergency contact details and any relevant information about your child including medical history

Complaints Procedure

In the event of any report of misconduct by a player/member at GTSHC or when representing the club at any other venue the misconduct will be investigated by the committee which could lead to the player/member's membership of GTSHC being terminated in accordance with the constitution of the club.

Section 8

Giffnock Tennis Squash & Hockey Club **Privacy Policy**

Introduction and about us

This privacy notice explains how Giffnock Tennis Squash & Hockey Club ("GTSHC") or, as applicable, Giffnock Tennis Club or Giffnock Squash Club or Giffnock Hockey Club – collectively referred to in this privacy notice as "the Club" (or "we", "our", "us") – collects, uses and shares your personal data.

How we use your personal data depends on whether you interact with us as a Member, a player, a coach or official, a volunteer, a visitor, a Members guest or other customer, as a user of our website (www.giffnock-ltc.co.uk) or in some other way. This privacy notice gives a general overview of how the Club processes personal data but you may receive more detailed information about data protection (including separate privacy notices) depending on the different ways you interact with us.

GTSHC, which is an unincorporated association, is the primary 'data controller' of your personal data for the purposes set out below. The Club is subject to the General Data Protection Regulation (the "GDPR") with effect from 25 May 2018.

The categories of personal data we collect

The Club collects and processes a range of information about you. This includes, for virtually all individuals, your name and contact information (such as your home and/or business address (as applicable), email address and telephone number, and including a parent's or guardian's contact details (for example, for Members who are children, where Club communications are sent to their parent)), records of communications and interactions we have had with you by various means, basic biographical information including your date of birth and gender (where relevant) and financial information including bank account details (used for accepting payments from you or making them to you, as applicable).

In addition, we will collect the following categories of personal data depending on how you interact with us:

For Members:

- Membership details;
- Wimbledon ballot entry;
- Rankings and ratings (or UTR as applicable);
- Competitions entered;
- Ticket information for events;
- NUS number/student details (if applicable); and/or
- Responses to surveys.

For customers including ticket buyers:

- Delivery address for products or services, including purchased tickets;
- Payment information and details of returns or refunds, where relevant; and/or
- Dietary requirements, access requirements and proof of ID, where relevant for attending Club events.

For players:

- Performance, match-play and training-related data;
- Rankings and ratings;
- Dietary requirements and other information relevant for training or competition arrangements;
- Medical records and injury information; and/or
- Anti-doping and disciplinary information, where relevant.

For coaches and officials:

- Accreditations, qualifications and training;
- Availability, selection and travel information;
- Evaluations and assessments of players and matches;
- PVG information (criminal records checks), where applicable; and/or
- Disciplinary and safeguarding information, where relevant.

For volunteers:

- Records of activity such as volunteer role(s), length of service, awards and number of hours;
- Application or registration details for the purposes of volunteering;
- Reference checks;
- Disciplinary and safeguarding information, where relevant; and/or
- Availability information.

For website users:

- Login ID information, including usernames; and/or
- Information provided through our website, including in messages and forms, for example forms for updating communication and marketing preferences.

Our administration of the Club may also require us to process special category data (including data relating to racial or ethnic origin, political opinions, religious beliefs, trade union membership, health and sexual life) and/or data relating to criminal convictions and offences (together "sensitive personal data").

How we collect personal data

We may collect your personal information in a number of ways, principally:

- Directly from you, for example when you apply for Membership, purchase our products or services including tickets, attend Club events, enter a competition, join a performance programme as a player, provide coaching or officiating services, and make enquiries on our website, and when you interact with us during your participation in the Club in various other ways;
- From someone else acting on your behalf, for example when a parent or guardian has purchased Membership for you as their child, when a ticket buyer names you as their guest at a Club event, when a coach or official provides performance or results data to the Club on behalf of a player, or when Club staff who are working with you in your capacity as a player, coach or official record information about you, for example when coordinating competitions;
- On rare occasions, we may receive information about you from others who are not acting on your behalf (for example, where someone makes a complaint about you which we then investigate);
- By creating it ourselves, for example when we produce match reports from watching players compete at events; and/or
- When you make enquiries on our website, or when you interact with us (for example, where you volunteer to assist with a competition, tournament or league organised by us, sign up for our volunteer communications, enquire about a volunteering opportunity), or through the club annual registration process and when your details are passed to us for the purposes of volunteer recognition.

We also collect certain personal data by automated means, including about visitors to the Club using CCTV monitoring.

Our basis for processing personal data and the purposes for which we use it

Performance of contracts. The Club will process your personal data where this is necessary for the performance of a contract with you, or to take steps at your request before entering into such a contract. For example, we need to process personal data in order to comply with the terms and conditions of membership with Members, other terms and conditions relating to the purchase of products or services including tickets, funding and player support agreements with players, services contracts with coaches and officials, volunteer agreements and the terms and conditions applicable to the use of our website.

Compliance with our legal obligations. In some cases, the Club needs to process your personal data in order to comply with its legal obligations. For example, we need to process personal data in order to comply with health and safety legislation, carry out PVG (criminal records) checks on coaches, officials and volunteer roles (where relevant) for safeguarding purposes, report certain tax information about our financial arrangements with third parties to HM Revenue & Customs and assist with investigations by police and/or other competent authorities.

Legitimate interests. In other cases, the Club has 'legitimate interests' in processing personal information about individuals we interact with. We have many such interests, including commercial interests and those with a wider public benefit. In essence, our principal legitimate interests are in pursuing our mission to get more people playing our sports more often and administering the Club in a way that promotes and safeguards the integrity of the sport. For example, we need to process personal data in pursuit of our legitimate interests in order to:

- organise competitions and major events;
- market the Club's products and services (including tickets, performance and participation programmes, coaching courses and events), and promote our sports more generally;
- ensure the security of Club events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images using CCTV monitoring;
- operate a customer services team, conduct surveys and seek advice from advisers with the aim of improving the Club and our sports as a whole;
- keep appropriate records of coaches, officials and volunteers;
- administer our performance programme (for example, monitor player progress or make player selection decisions);

- structure the Club, storing most personal data centrally and making use of certain software and/or cloud storage providers for the purposes of efficient, fast and secure access to personal data; and
- research and statistical analysis (for example into volunteering practices and patterns).

Where the Club relies on legitimate interests as the legal basis for processing personal data, it has considered whether or not those interests are overridden by the interests or fundamental rights or freedoms of the individuals whose data are being processed and concluded that the processing is, on balance, fair.

Consent. The Club may also process your personal data on the basis of consent you give, for example to send you certain direct marketing communications.

Processing special categories of data. Where we process sensitive personal data, other legal bases for processing may apply, including where our processing is necessary for the establishment, exercise or defence of legal claims (for example, to protect and/or defend our property or rights, or those of other Club stakeholders), for reasons of substantial public interest (for example, to conduct research about player performance), for provision of medical care and treatment, for the purposes of equal opportunities monitoring or where you have otherwise given us your explicit consent (for example, to allow the use of performance players' medical records for performance monitoring purposes, or to share those records with another sports organisation, or where coaches or officials provide us with data relating to criminal convictions and offences as part of the PVG disclosure process).

Who we may share your data with

Personal information collected and processed by the Club may be shared with the following recipients, or categories of recipients, where necessary:

- Someone acting on your behalf, for example a parent or guardian who has purchased Membership for you as their child;
- Our employees and volunteers (as applicable), for the purposes of providing particular products or services to you;
- Competition organisers and officials involved in competitions you are taking part in;
- (Where you are a volunteer) with our employees and other volunteers, for the purposes of volunteer management and administration and any volunteering application or project; and to arrange your accreditation for an event;
- The Lawn Tennis Association, Scottish Squash Limited and Scottish Hockey Union as our sporting governing bodies;

- Our contractors and suppliers, where they process personal data on our behalf (for example, IT consultants and hosted software providers and professional providers), as well as third parties we use to help us provide Club participation programmes;
- The Protecting Vulnerable Groups scheme, and safeguarding committees and 'umbrella bodies' (for the purpose of carrying out criminal records checks on coaches and officials and others where relevant), HM Revenue & Customs (for tax reporting purposes), the police and/or other competent authorities, as applicable; and
- Former employers and other providers of necessary background checks.

Typically, the Club will not transfer your personal data to countries outside the European Economic Area (EEA). On the limited occasions when this does occur (for example, because your personal data is stored on an IT system hosted outside of the EEA), we ensure that any such transfer meets the requirements of GDPR, for example because it is necessary for the provision of our products or services to you or for the establishment, exercise or defence of legal claims; or is otherwise subject to prescribed safeguards such as 'model clauses' approved by the European Commission. You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us using the details below.

How long we will store your data

We may retain your personal data for as long as is necessary to fulfil the purposes set out in this privacy notice and/or the Club's reasonable requirements. On expiry of the relevant retention period, your personal data will be deleted, suppressed or anonymised, as applicable, save as may be required by our sporting governing bodies.

Your rights in relation to your personal data

Under the GDPR, you have the right to:

- obtain access to, and copies of, the personal data that we hold about you;
- require us to correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data in certain circumstances;
- require us to restrict our data processing activities in certain circumstances;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller;

- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you; and
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

If you would like to exercise any of these rights, please contact us in writing using the contact details below. Please note that these rights are not absolute and we may be entitled (or required) to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal data, you can complain to the Information Commissioner's Office (ICO). You can also find out more about your rights under the GDPR (and other data protection legislation) from the Information Commissioner's Office website available at: www.ico.org.uk.

If you do not provide personal data

In some cases described above, the provision of personal data is a contractual requirement, and/or a statutory requirement if you wish to engage with the Club in a certain way (for example, where you wish to work as a Club coach or official, and there is a statutory requirement for us to carry out a criminal records check on you, for safeguarding purposes). In those and other cases, if you do not provide us with certain personal data, we may not be able to work with you or provide our products or services to you (as applicable), or it may adversely affect the provision of our services to you.

Cookies

Information may be sent to your computer in the form of an Internet "cookie" to allow the Club servers to monitor your requirements. The cookie is stored on your computer. The Club server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you.

This is necessary to allow the Club to measure the usability of the systems, which will help to improve the user experience of our websites. Your browser software should however enable you to block cookies if you wish to.

Contact us

If you have any queries about this privacy notice or how we process your personal data, you may contact us:

- by email: president@giffnock-ltc.co.uk
- or by post: Data Protection, Giffnock Tennis Squash & Hockey Club, 4 Percy Drive, Giffnock, Glasgow, G46 6PA, United Kingdom

Section 9

Giffnock Tennis Squash & Hockey Club **GDPR Privacy Notice**

What is the purpose of this document?

The Trustees of Giffnock Tennis Squash & Hockey Club (**GTSHC**) are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all employees, workers and contractors.

GTSHC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation. Information about criminal convictions also warrants this higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.

- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date and, if different, the date of your continuous employment.
- Leaving date and your reason for leaving.
- Location of employment or workplace.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means.
- Photographs.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about employees, workers and contactors through the application and recruitment process, usually directly from candidates. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs).
- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.

- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation or trade union membership, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Situations in which we will use your sensitive personal information

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive personal information are listed below.

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance. We need to process this information to exercise rights and perform obligations in connection with your employment.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our privacy standard.

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in

place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Data sharing

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents).

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to HMRC and disclosures to shareholders such as directors' remuneration reporting requirements.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business

need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the President of GTSHC. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the President of GTSHC.